

**INFORMATION COLLECTION REQUEST
FOR THE NO_x SIP CALL (40 CFR 51.121 - 51.122)**

SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

NO_x SIP Call (40 CFR 51.121 – 51.122), EPA ICR Number 1857.11, OMB Control Number 2060-0445.

1(b) Short Characterization / Abstract

This is a renewal of the Environmental Protection Agency's (EPA's) information collection request (ICR) addressing the burden and costs of information collection activities indirectly required under the NO_x SIP Call (the Rule). The Rule requires affected states to include certain provisions in their state implementation plans (SIPs) addressing emissions of nitrogen oxides (NO_x) that adversely affect air quality in other states. Prior to this renewal, one of the Rule's requirements applicable to all affected states was that the SIPs had to include provisions requiring large electricity generating units (EGUs) and large non-EGU boilers and turbines to monitor and report their NO_x mass emissions during the May-September ozone season according to the provisions of 40 CFR part 75 (referred to here as Part 75 monitoring requirements). Although the Rule does not impose any requirements directly on sources, the Part 75 monitoring requirements were added to SIPs because of the Rule, and EPA has therefore submitted and periodically renewed an ICR to account for the information collection burden and costs of the Part 75 monitoring requirements imposed indirectly on sources under the Rule's mandatory requirements for SIPs.

In an action parallel to this ICR renewal, EPA has finalized amendments to the NO_x SIP Call making the inclusion of Part 75 monitoring requirements in SIPs voluntary instead of mandatory for the states. To the extent that some affected states choose to revise their SIPs to require sources to perform other forms of monitoring, the number of sources conducting Part 75 monitoring because of the NO_x SIP Call will decrease. This ICR renewal estimates the information collection burden and costs under the NO_x SIP Call following finalization of the amendments allowing states to establish monitoring requirements for large EGUs and large non-EGU boilers and turbines in their SIPs other than Part 75 monitoring requirements.

Most large EGUs (and some large non-EGU boilers and turbines) affected under the NO_x SIP Call are also subject to comparable Part 75 monitoring requirements under the Acid Rain Program (ARP) and/or the Cross-State Air Pollution Rule (CSAPR) trading programs. Both the ARP and CSAPR have approved ICRs (OMB Control Nos. 2060-0258 and 2060-0667), and this ICR accounts for information collection burden and costs only for sources that are not required to perform Part 75 monitoring under the ARP or CSAPR programs and whose information collection burden and costs therefore are not accounted for in the ARP ICR or the CSAPR ICR. This ICR also accounts for information collection burden and costs for additional sources – primarily smaller EGUs – that states voluntarily have made subject to Part 75 monitoring

requirements under the SIPs they adopted for NO_x SIP Call compliance, going beyond the Rule's existing requirements.

Under the NO_x SIP Call, states are required to report certain data regarding emissions of sources in the state to EPA on an annual or triennial basis. The Air Emission Reporting Rule (AERR) for the national emission inventory includes very similar reporting requirements, and EPA believes that there is no material incremental information collection burden and cost associated with the required state reporting for NO_x SIP Call purposes beyond the burden and cost estimates included in the AERR ICR (OMB Control Number 2060-0580). Thus, the only information collection burden and costs addressed in this ICR relate to the monitoring and reporting requirements imposed on sources through the states' SIPs for compliance with the NO_x SIP Call.

2. NEED FOR AND USE OF THE COLLECTION

This section describes EPA's need for the information collections described above and the legal authority for conducting collections. The users of collected information are also described.

2(a) Need/Authority for the Collection

The state reporting requirements included in the NO_x SIP Call are necessary for EPA to carry out properly its evaluation of each state's compliance with its ozone season NO_x emissions budget. The legal authority for the reporting requirements resides in Clean Air Act (CAA) sections 110(a) and 301(a). Specifically, the requirement in section 110(a)(2)(D) that SIPs include "adequate provisions" to mitigate certain transport effects on other states implicitly authorizes emissions inventory reporting to EPA, as needed and appropriate to verify that a state is in fact meeting its NO_x budget. Section 110(a)(2)(F) provides additional authority for requiring that SIP call submissions include provisions for emissions reporting by sources to a state, correlation of source information by the state, and steps by the state to make the correlated information available to the public. Section 110(a)(2)(K), in turn, requires a state to submit to EPA as requested data related to modeling the effect of NO_x and other emissions on ambient air quality. The reported emissions inventory data is used by EPA in air quality modeling to assess the effectiveness of the transport rulemaking's regional strategy. Finally, CAA section 301(a) grants EPA broad authority to prescribe such regulations as are necessary to carry out its functions under the Clean Air Act.

As amended in parallel with this renewal, the NO_x SIP Call regulations do not establish a mandatory form of monitoring that states must include in their SIPs to obtain the data required to be reported to EPA. Rather, under 40 CFR 51.121(f)(1) and (i)(1), which repeat certain general requirements applicable to all SIPs under 40 CFR 51.111, 51.210, and 51.211, states must simply ensure that monitoring is sufficient to allow the state to ensure that the control measures in the SIP are being complied with.

2(b) Practical Utility/Users of the Data

EPA believes it is essential that compliance with the regional control strategy be verified. Tracking emissions is the principal mechanism to ensure compliance with the budget and to

assure the downwind affected states and EPA that the ozone transport problem is being mitigated. The information collected by the industry sources subject to this ICR provides necessary input data to the state emissions inventory needed for tracking regional control strategy compliance.

Further, the emissions reductions attributable to the NO_x SIP Call have been relied on to support numerous final actions redesignating areas to attainment of national ambient air quality standards (NAAQS). Under CAA section 107(d)(3)(E), emissions reductions that are relied on to support redesignation actions must be “permanent and enforceable.” Continued collection of emissions data is necessary to ensure that the emissions reductions are permanent and enforceable and can therefore continue to be used to support other EPA actions.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

This section describes: (1) efforts by EPA to learn whether the information requested is available from other sources; (2) consultations with respondents and data users to plan collections, monitor their usefulness, and minimize the collection burden; (3) effects of less frequent collections; and (4) justification for deviations from OMB’s general guidelines.

3(a) Non-duplication

To minimize the reporting burden on state agencies, the state reporting requirements under the NO_x SIP Call are integrated with the annual and periodic emission inventory reporting requirements under the Air Emissions Reporting Rule.

Almost all information collected from emissions sources under this ICR renewal is not otherwise available. All reporting formats for affected sources required to monitor under Part 75 for any program, such as the Acid Rain Program or CSAPR, are fully integrated across programs. For a unit subject to more than one of these programs, a single quarterly submission is used to satisfy the quarterly reporting requirements for all programs. Where a source monitors under Part 75, the Part 75 monitoring generally also satisfies the monitoring requirements that apply under other federal programs that do not themselves require Part 75 monitoring, such as new source performance standards.

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

EPA included notice of this ICR renewal in the Federal Register notice for the proposed amendments to the NO_x SIP Call regulations (83 FR 48751, September 27, 2018). None of the comments that EPA received on the proposal concerned the ICR renewal.

3(c) Consultations

EPA has held numerous consultations on Part 75 monitoring requirements during the development of the ARP, the NO_x SIP Call, the Clean Air Interstate Rule, and CSAPR.

For the initial development of the NO_x SIP Call, on January 13, 1998, EPA held a one-day pre-proposal workshop with the states to discuss tracking issues. The objective of the workshop was to determine what type and frequency of inventory reporting is feasible for the

different source sectors (power generating sources, other point sources, area sources, non-road mobile, and highway mobile sources), to identify key reporting issues related to each sector, and to develop recommendations on reporting requirements to ensure compliance with the NO_x budgets. The goal was to share information and ideas rather than to reach consensus. A summary of the meeting is contained in the docket (docket no. A-96-56, item V-B-18) for the NO_x SIP Call rulemaking. The reporting requirements included in 40 CFR 51.122 are based, in part, on the suggestions of participants in the workshop.

The state recordkeeping and reporting requirements under the NO_x SIP Call were included in the supplemental proposal (63 FR 25902, May 11, 1998) on which public comments were solicited. Comments received were reviewed and where appropriate were incorporated into the rule requirements.

Finally, as part of updating the ICR for the ARP (Part 75) monitoring requirements, EPA also contacted various affected parties to gather information on CEM capital costs, CEM operation and maintenance costs, fuel meter capital costs, and CEM and fuel flowmeter testing costs. That information has been used in this ICR where appropriate.

3(d) Effects of Less Frequent Collection

If this information collection were not carried out at least annually for sources being controlled to meet the NO_x budgets, EPA would not be able to verify that NO_x emission reductions necessary to meet each state's NO_x emission budget were being achieved.

Quarterly collection of emissions data for the affected units allows the opportunity to check data for errors and provide rapid feedback on needed adjustments to data collection systems, and thereby promoted accurate and reliable emissions data. For this same reason, existing federal and state emission monitoring programs often require quarterly reporting, or in some cases, monthly. Less frequent collection, such as semi-annually or annually, would increase the amount of preparation and review time at the end of the reporting period both for regulated sources and for EPA. This would slow down the process for the verification of compliance.

3(e) General Guidelines

This information collection does not violate the general guidelines set forth by OMB and found in 5 CFR 1320.5(d)(2).

3(f) Confidentiality

As required by CAA section 114, estimates or measurements of emissions must be treated as non-confidential. Under Agency procedures, data items relating to the computation of emissions may be identified as sensitive by a state and are then treated as "state-sensitive" by EPA. The potentially state-sensitive items include the process rate, boiler design capacity, emission estimation codes, percent space heat, operating rate, and maximum operation rate/hour. Where federal and state requirements are inconsistent, the appropriate EPA Regional Office should be consulted.

3(g) Sensitive Questions

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

This section lists the major categories of sources that formerly participated in the NO_x Budget Trading Program and that continue to have reporting obligations associated with the NO_x SIP Call that are not duplicated under other rules, the data items requested from the sources, and the activities in which the sources must engage to assemble or submit the required data items.

4(a) Respondents / NAICS Codes

This ICR estimates the burden for sources affected under the NO_x SIP Call that are not subject to Part 75 monitoring requirements under another program (i.e., the Acid Rain Program or a CSAPR trading program) to monitor NO_x mass emissions so that states and EPA can track compliance with state emission budgets and NO_x control measures for NO_x SIP Call purposes. The affected sources are generally fossil fuel-fired boilers and stationary combustion turbines that have heat input capacities greater than 250 million BTU per hour or that serve electricity generators with nameplate capacities greater than 25 megawatts. Sources meeting these criteria operate in a variety of industries, including:

- Fossil fuel-fired electric power generation, North American Industry Classification System (NAICS) 221112.
- Grain and oilseed milling, NAICS 3112.
- Pulp, paper, and paperboard mills, NAICS 3221.
- Petroleum and coal products manufacturing, NAICS 3421.
- Basic chemical manufacturing, NAICS 3251.
- Iron and steel mills and ferroalloy manufacturing, NAICS 3311.
- Colleges, universities and professional schools, NAICS 6113.

Some states have also adopted SIP provisions making additional units subject to Part 75 requirements for NO_x SIP Call purposes although not required to do so. Most of these sources are combustion turbines serving electricity generators with nameplate capacities between 15 and 25 megawatts.

4(b) Information Requested

This section describes the industry reporting requirements needed to enable state agencies to meet their reporting and recordkeeping requirements under the NO_x SIP Call in cases where the states choose to require that the information be monitored and reported directly to EPA in accordance with Part 75.

(i) Data Items, Including Recordkeeping Requirements

The affected units must monitor NO_x mass emissions and record and report emissions data using the requirements of 40 CFR Part 75. The emissions monitoring requirements specify that affected sources must: (1) submit a monitoring plan for each affected unit at a source; (2) submit data for certification of each monitor; (3) record hourly operational, pollutant monitor, and flow monitor data for each affected unit and (4) submit quarterly reports of their emissions data to EPA. The Acid Rain Program ICR (OMB Control Number 2060-0258) contains links to a list of the data items required by the recordkeeping and reporting provisions of Part 75.

Respondents are required by 40 CFR 75.64 to submit the quarterly NO_x mass emissions data to EPA electronically and must include a certification statement by the designated representative of the unit. All monitoring records are to be kept for three years, with one possible exception under a voluntary option for fuel flowmeter calibration testing.

(ii) Respondent Activities

The affected units must (1) complete and submit appropriate monitoring plan forms for each affected source and each affected unit at a source; (2) conduct tests to certify the operation of monitors and submit test results to EPA; (3) record hourly emissions data (this activity generally is performed electronically); (4) conduct operation and maintenance activities associated with the monitoring, including quality assurance activities; (5) assure data quality, prepare quarterly reports of emissions data and submit these reports to EPA; and (6) respond to error messages generated by EPA. In addition, respondents must purchase the necessary monitoring hardware and electronic data reporting software (or software upgrades).

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

The first part of this section describes Agency (EPA) activities related to the acquisition, analysis, storage, and distribution of the information collected from sources. The second part describes the information management techniques employed to increase the efficiency of collections. The third part discusses the burden or benefits of the collection activities described in this ICR to small entities. The last part outlines the schedule for collecting information.

5(a) Agency Activities

The tasks that are performed by EPA include processing, reviewing, and evaluating emissions data reports submitted by the affected units, and conducting appropriate audit activities to verify the information provided.

5(b) Collection Methodology and Management

Several computer systems and associated databases have been developed to record quarterly emissions monitoring data under Part 75. The systems and databases are designed to coordinate the information for easy access and use by the Agency, states, regulated community, and the public. EPA provides access to the emissions data in both detailed and summary formats on the Clean Air Markets Division website.

5(c) Small Entity Flexibility

In the NO_x SIP Call rulemaking, 63 FR 57356 (October 27, 1998), the Administrator certified that the rule will not have a significant economic impact on a substantial number of small entities.

The low mass emissions provisions under 40 CFR 75.19 provide for optional reduced monitoring, quality assurance, and reporting requirements for certain units that combust natural gas and/or fuel oil. Such units must emit no more than 100 tons of NO_x annually, 50 tons of NO_x during the May-September ozone season, and 25 tons of SO₂ annually, and must calculate no more than these same amounts based on specified procedures for calculating and reporting emissions. Units that qualify are exempted from certain requirements to install and operate monitoring equipment, conduct fuel sampling, and perform quality assurance or quality control tests. Moreover, emissions reporting requirements are significantly simplified for these units.

Gas- or oil-fired units that do not qualify for the low mass emissions unit provisions under 40 CFR part 75 may still meet criteria that allow for the use of alternative methods to measure emissions. As discussed in the Regulatory Impact Analysis of the final ARP regulations (October 19, 1992), smaller utilities are more likely to be dependent on these oil- and gas-fired units, especially very small utilities.

5(d) Collection Schedule

Affected units conduct ongoing monitoring, with quarterly reporting.

6. ESTIMATING THE BURDEN AND COST OF COLLECTIONS

6(a) Estimating Respondent Burden

The primary tasks performed by owners and operators of affected units are: (1) reviewing the regulations, forms and instructions; (2) responding to EPA generated error messages and audits; (3) programming a data acquisition and handling system (DAHS) and debugging the software; (4) completing and submitting monitoring plans for each unit at the source; (5) performing appropriate tests and providing test results to certify each monitor; (6) performing quality assurance testing and maintenance upon monitors; and (7) assuring the quality of emissions data, preparing quarterly reports of emissions data, and submitting reports to EPA.

(i) Regulatory Review.

The estimate for time to review instructions and requirements remains consistent with the labor estimates used in previous ICRs (four manager hours and four technician hours each year) where no substantial changes have been made to the Rule

(ii) Response to Error Messages/Audits.

EPA provides feedback to sources so that suspected errors in submissions by sources are noted and corrected. The Agency estimates that for each unit, an owner or operator will spend

approximately six hours of managerial time and eighteen hours of technician time responding to these error messages each year.

(iii) DAHS Debugging.

Each source must purchase (or create) and install computer software designed to implement the electronic data reporting formats required under Part 75. For the years covered by this ICR renewal, EPA estimates that for each unit, four managerial and 12 technician hours will be required annually for occasional further debugging.

(iv) Monitoring Plans.

Consistent with the existing ICR, completing and submitting initial monitoring plans is estimated to require an average of about 20 hours per unit. EPA shows a separate line item for initial monitoring plan preparation for new units, estimated as 10% of the number of existing units. (EPA assumes that any new units would be offset by an equal number of retirements.)

For existing units, the burden associated with revising the monitoring plan is included in the time for preparing and submitting each quarterly emissions report.

(v) Monitor Certification.

Initial certification burdens and costs for new monitoring equipment are considered part of start-up activities since these costs are often part of the overall purchase expense for the equipment. Sources occasionally experience burdens for recertification to the extent a change in a monitoring system requires recertification. Based on the previous ICRs, EPA estimates that approximately ten percent of units will have to recertify each year following the year in which the initial certification occurs. The ICR incorporates a labor burden estimate generally consistent with existing Agency models for the labor burdens associated with certification. However, note that the ICR reduces the labor hours for this activity to avoid double-counting hours that are already accounted for in the quality assurance activity area (see the following subsection). The double-counting would occur because a portion of the labor incurred for the certification or recertification event replaces the labor burden that is generally allocated to the annual relative accuracy test audit (RATA) in the year in which the certification event occurs.

(vi) Quality Assurance.

Quality assurance (QA) activities and other routine maintenance for monitoring systems is the largest burden item under the CSAPR and Texas trading programs. These requirements generally include daily, quarterly, and annual QA requirements, depending on the monitoring approach being used. For reporting units that use a CEMS, the Agency has assumed a per unit labor burden based on a variety of sources, including the existing ARP ICR, information provided by sources, a CEM cost model developed by EPA, and comments submitted in response to the NO_x SIP Call. For units that rely on alternative methodologies, reduced labor burden estimates apply because the quality assurance activities for the excepted methods are less than for a CEMS. Consistent with the existing ARP ICR, the labor burden is expected to be almost entirely technician labor.

(vii) Quarterly Reports.

Tasks performed by utilities in preparing quarterly reports include: (1) assuring the quality of the data; (2) preparing the quarterly report; (3) revising the monitoring plan, if necessary; (4) preparation of hard copy documentation accompanying the quarterly reports; and (5) managerial review. The existing ARP ICR was used as the basis for these estimates.

6(b) Estimating Respondent Costs

(i) Estimating Respondent Labor Costs

In estimating labor costs for industry, EPA used the following amounts: \$112.22 per hour for managers and \$77.66 per hour for technicians. These rates were updated from the previous NBP ICR rates based on the Current Employment Cost Index, June 2017 (<https://www.bls.gov/home.htm>).

(ii) Estimating Total Capital and Annual Operations and Maintenance Costs

Capital/start-up costs include the cost of installing required CEMS or alternatives. Operation and maintenance costs (exclusive of labor costs) reflect ongoing costs to a unit and include both contractor costs for the required recertification, diagnostic, and quality assurance (QA) testing, and other direct maintenance-related expenses (e.g., spare parts and calibration gases). These cost estimates have been derived from EPA CEM cost models, existing ICRs, Agency staff experience under the ARP, NO_x SIP Call, CAIR, and CSAPR programs, and supplemental estimates provided by affected utilities and others related to the various cost items. These costs are assumed to include incremental calibration gas costs consistent with the former ICR for the Protocol Gas Verification Program (OMB Control Number 2060-0626).

Note that testing contractor costs for certification, recertification and annual relative accuracy test audits (RATAs) are presented as other direct costs and are not converted to equivalent source labor hours. This approach is consistent with the common business practice of obtaining outside contractors to conduct certification/recertification tests and annual RATAs. For initial certification, the certification test costs are commonly bundled with equipment purchase contracts, according to information provided by a range of CEMS equipment vendors. For RATAs that are conducted either as part of the annual quality assurance requirements or as part of recertification, industry contacts have indicated that RATA testing is usually performed under a fixed price contract basis, except for travel costs that may be billed on an hourly basis beyond the basic contract cost.

As noted above, this ICR includes ongoing annualized start-up/capital costs as well as ongoing O&M costs for any monitoring equipment needed by the unit to meet the applicable monitoring and reporting requirements, regardless of when the equipment was initially installed.

(iii) Capital/Start-up vs. Operating and Maintenance (O & M) Costs

Capital costs reflect one-time costs for purchase of equipment which will be used over a period of years. Conversely, operating and maintenance costs are those costs which are incurred

on an annual or other scheduled basis. For instance, costs associated with quality assurance activities, such as spare parts or contractor costs for work, will be incurred on an annual basis.

(iv) Annualizing Capital Costs

The relevant capital costs for the emissions trading portion of this ICR were annualized at a rate of seven percent (i.e., the annualized capital cost was calculated assuming money to purchase the capital equipment was borrowed at a seven percent annual interest rate). The cost of the loan was amortized over the life of the loan to repay the original borrowed amount plus interest. The result is the annualized capital cost reported. The annualized cost of the necessary capital purchases varies from \$2,250 to \$28,879, per year, per unit, depending on the type of monitoring methodology.

6(c) Estimating Agency Burden and Cost

The tasks that will be performed by EPA include processing, reviewing, and evaluating emissions data reports submitted by the affected units, and conducting appropriate audit activities to verify the information provided. Assuming that 340 affected units will submit 1180 quarterly emission reports to EPA each year, the total annual burden incurred by the Agency will be 2360 hours. (The estimated annual total of 1180 quarterly emissions reports is based on an assumption that 250 units will submit reports for all four quarters each year and 90 units will submit reports only for the two quarters each year that encompass the May-September ozone season.) The total annual cost to EPA for processing, reviewing, and evaluating these quarterly emissions reports will be approximately \$200,600. Table 6-3 summarizes the Agency burden and costs associated with emissions reporting.

Federal agency labor rates were assumed to be \$85.00 per hour. This labor rate was derived from the federal government's 2017 U.S. Office of Personnel Management General Schedule "Salary Table 2017-GS" (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS.pdf>) using the factors in the following table.

Table 6-1: Determination of Federal Wage Rates

Annual salary of technical staff, GS 13, Step 8		\$98,986
Annual cost of supervisory staff, GS 15, Step 8	\$127,864	
Factor (1/11)	0.09	
		\$11,508
Benefits	1.6	
Total cost per FTE		\$176,790
Total hourly cost (total cost per FTE divided by 2,080 hours per year)		\$85.00

6(d) Estimating the Respondent Universe and Total Burden and Costs for Affected Units

EPA estimates that on average there will be 340 affected units that will continue to conduct monitoring in accordance with Part 75 solely under the NO_x SIP Call during the 2019-2021 period covered by this ICR renewal. Currently approximately 442 units are subject to Part 75 reporting requirements under the NO_x SIP Call and not under any other program (such as the ARP or a CSAPR trading program). Of these 442 units, 308 are units for which states had to require Part 75 monitoring under the previous NO_x SIP Call regulations but no longer must do so under the amended regulations, and 134 are units that are required to perform Part 75 monitoring under states' SIPs despite the absence of any requirement for Part 75 monitoring in the current NO_x SIP Call regulations. For purposes of estimating information collection burden and costs for this ICR renewal, EPA has assumed that over the course of the 3-year renewal period, states representing half of the estimated 308 units affected by the amendments will revise their SIPs to end Part 75 monitoring requirements for these units. The estimate assumes that the SIP revisions are phased in equally over the 2019-2021 period – i.e., the fractions of the 308 units that will no longer perform Part 75 monitoring as of 2019, 2020, and 2021 will be 1/6, 1/3, and 1/2, respectively, yielding an average reduction over the 2019-2021 period of 1/3 of the units, or a reduction from 308 units to 206 units on average. EPA assumes that the reductions in the numbers of units using each of the available Part 75 monitoring methodologies will be proportionate. With respect to the remaining 134 units, EPA has assumed no reduction in the number of units performing Part 75 monitoring, because the states concerned have not revised their SIPs to end Part 75 monitoring requirements for these units despite having had the ability to do so since 2015 or earlier. The assumed monitoring methodologies for these 134 units continue to reflect the actual monitoring methodologies currently used by the units.

Table 6-2 shows the total burden and total cost for this respondent universe. Estimates of the Agency's burden and costs are shown in Table 6-3.

TABLE 6-2: ANNUAL RESPONDENT BURDEN/COST ESTIMATES FOR AFFECTED UNITS

Information collection activity	Mgr. \$112.22/ hour	Tech. \$77.66/ hour	Respondent hours/year	Labor cost/year	Cont./ O&M cost	Capital/ startup cost	Number of respondents	Total hours/ year	Total cost/year
1. Review instructions and requirements	4	4	8	\$760	\$0	\$0	160	1,280	\$121,600
2. Respond to EPA-generated error messages, field audits	6	18	24	\$2,071	\$0	\$0	340	8,160	\$704,140
3. DAHS debugging	4	12	16	\$1,381	\$0	\$0	340	5,440	\$469,540
4. New unit monitoring plans	10	10	20	\$1,899	\$0	\$0	34	680	\$64,566
5. Recertify monitors	38	12	50	\$5,196	\$3,400	\$0	34	1,700	\$292,264
6. Startup/capital items and perform QA testing and maintenance									
(a) NO _x and flow CEMS	50	480	530	\$42,888	\$31,200	\$28,879	63	33,390	\$6,486,921
(b) NO _x CEM and fuel flowmeter	20	375	395	\$31,367	\$17,400	\$18,750	111	43,845	\$7,494,387
(c) App. E and fuel flowmeter	5	30	35	\$2,891	\$1,800	\$2,250	6	210	\$41,646
(d) LME	4	12	16	\$1,381	\$1,991		160	2,560	\$539,520
7. Assure data quality, prepare reports (incl. monitoring plan update), submit reports ^a	20	82	102	\$8,613	\$0	\$0	340	34,680	\$2,928,420
TOTAL:								131,945	\$19,143,004

^a Based on an assumption of 250 annual reporting and 90 ozone season only reporting facilities.

TABLE 6-3: ANNUAL AGENCY BURDEN/COST ESTIMATES

Tasks	Quarterly burden hours per report	Quarterly cost per report ^a	Number of reports ^b	Total burden per year (hours) (2019-2021)	Total cost
Process, review, and evaluate quarterly report and issue feedback letter.	2	\$170	1,180	2,360	\$200,600

^a Based on an average total compensation rate of \$85.00 per hour.

^b Based on an assumption of 250 annual reporting and 90 ozone season only reporting facilities.

6(e) Summary of Burden Hours and Costs

Table 6-4 summarizes the annual aggregate burden and cost estimates for both the respondents and the agency for the period of 2019 through 2021.

TABLE 6-4: AGGREGATE ANNUAL RESPONDENT AND AGENCY BURDEN AND COST OF COLLECTIONS (2019 – 2021)

Program	Total annual burden (hours)	Total annual costs ^a
Annual Industry Respondent Burden	131,945	\$19,143,004
Annual Agency Burden	2,360	\$200,600
TOTAL	134,305	\$19,343,604

^a 2017 dollars.

6(f) Reasons for Change in Burden

This ICR renewal shows a reduction in industry burden of 57,316 hours and a reduction in industry annualized capital and non-labor O&M of \$3,971,370 relative to the previous approved ICR. Hourly burden estimates per respondent in this ICR renewal are the same as those in the previous ICR for each reporting methodology. The total burden and cost have decreased primarily due to the assumption that following finalization of the amendments to the NO_x SIP Call regulations, some states will revise their SIPs to eliminate Part 75 monitoring for some sources, leading to a decrease in the number of sources that will perform Part 75 monitoring and reporting for purposes of this ICR renewal over the 2019-2021 period. The assumption regarding the number of sources for which Part 75 requirements are eliminated is necessarily a pro forma estimate that could either substantially overstate or substantially understate the actual number of sources for which Part 75 requirements are eliminated over this period. In addition to the assumption concerning the effect of the NO_x SIP Call amendments, a secondary reason for the reduction in burden and costs from the previous ICR is a reduction in the source inventory because of unit retirements.

EPA also notes that the estimated burden and costs in this renewal do not account for the burden and costs of monitoring and reporting that sources would have to perform if Part 75 monitoring is no longer required. EPA expects that, as much as possible, states electing to eliminate Part 75 monitoring requirements for NO_x SIP Call purposes generally would choose to meet the NO_x SIP Call's remaining information collection requirements by relying on emissions information collected from sources through existing monitoring requirements under other state or federal programs, rather than by imposing new monitoring requirements solely for NO_x SIP Call purposes. (In the case of federal programs, the costs of such existing monitoring requirements generally would already be accounted for under the ICRs for the other programs.)

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 112 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2018-0595, 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, to 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 Docket ID Number EPA-HQ-OAR-2018-0595 and OMB Control Number 2060-0445 in any correspondence.