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

EPA ICR #2495.05

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 estimates for collection of 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. 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 were required 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 (SO₂) Primary National Ambient Air Quality Standards rule (“SO₂ Data Requirements Rule” or “DRR”)¹. This ICR reflects revisions to the initial ICR and covers the period of Jan. 1, 2023 – December 31, 2025. It includes estimates of the burden for state and local air agencies and for EPA associated with developing, submitting, and processing the information described for purposes of satisfying ongoing requirements under the SO₂ Data Requirements Rule.

The SO₂ 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 SO₂ emissions. The rule described the criteria for identifying and listing the source areas where air agencies needed to characterize SO₂ air quality. The rule also requires states to continue to provide monitoring, modeling, and emissions data for 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 SO₂ NAAQS. It describes the process and timetables by which air quality management agencies are 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 developed by

¹ See 80 FR 51052 (August 21, 2015).

the states in accordance with this rule have been and may be used in the future for designations, as well as other programs related to the 2010 SO₂ NAAQS.

More specifically, through the SO₂ Data Requirements Rule and the original ICR, EPA required states to characterize ambient air quality around SO₂ sources with emissions that were greater than 2,000 tons per year (tpy) or that were otherwise included as a listed source.² Based upon 2011 emissions data, the initial action identified approximately 412 SO₂ sources in 43 states. In the 2019 renewal of this ICR, EPA addressed ongoing requirements that (1) applied to air agencies that chose the monitoring pathway for characterizing air quality for certain sources, and 2) applied to air agencies that 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 original number of listed sources for which air agencies chose the *monitoring* pathway, and thus that are required to submit ongoing monitoring information, was 73 sources in 24 states (77 monitors total).

In this ICR renewal, EPA is addressing ongoing requirements that 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 modeling pathway that are required to submit ongoing data reports, and, potentially, updated modeling, are 137 sources in 36 states.

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. The reports must: 1) include the annual SO₂ emissions of each applicable source in each such area, 2) provide an assessment of the cause of any emissions increase from the previous year, and 3) 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 SO₂ 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.

The cost estimates included in this ICR renewal cover the total ongoing estimated costs for air agencies to provide these annual reports for emissions sources covered by the air quality modeling pathway. This ICR also includes upper bound cost estimates for the unlikely scenario where air agencies determined it was necessary to conduct additional modeling for all listed sources subject to the ongoing emissions reporting requirements.

Air agencies that elected under Subpart BB of Part 51 to conduct ambient monitoring for listed DRR sources continue to be responsible for collecting ambient air quality data information,

² Pursuant to section 51.1203(a) of the SO₂ Data Requirements Rule, air management agencies were required to submit a list of applicable sources by no later than January 15, 2016. See 80 FR 51087, August 21, 2015.

and submitting these data electronically to EPA's Air Quality System (AQS) and other voluntary databases. This information collection and the associated burden are captured under the Ambient Air Quality Surveillance 40 CFR Part 58 ICR (OMB #2060-0084, EPA ICR# 0940.29). Currently, for those state and local air agencies that chose the monitoring pathway for specific sources and source areas, the DRR requires that ongoing monitoring meet the requirements in 40 CFR Part 58. While information collections associated with initial ambient air quality monitoring under Part 51 were included in the prior version of the DRR ICR, any collections associated with ongoing monitoring are now covered by the Part 58 ICR for ambient monitoring. Ongoing collections have been removed from the DRR ICR to avoid duplicative burden calculations. Future renewals of the Part 58 ICR will continue to cover any collections of ongoing ambient air monitoring data that were initiated under Subpart BB of Part 51, as long as any of those monitors continues to operate.

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 emissions data and/or modeling data, to determine the status of air quality across the United States, 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 SO₂ NAAQS in all areas of the United States is directly dependent upon the availability of ambient air quality data (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 SO₂, 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, 7414(a), 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 sulfur 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.

(b) Practical Utility/Users of the Data

EPA may use the ambient air quality data (emissions and/or modeling data) submitted pursuant to this collection for area designations and other decisions with respect to the SO₂ NAAQS and SO₂ 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. 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's ongoing requirements are meeting the standard.

To identify how the nation is progressing in improving air quality, the OAQPS annually prepares 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

(a) Non-duplication

This collection of 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. 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.

(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 87 FR 49590, October 11, 2022.

(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. Prior to the original ICR, EPA conducted several stakeholder meetings to discuss issues associated with implementation of the SO₂ standard. In addition, EPA developed two Technical Assistance Documents for monitoring and modeling. These documents provided technical advice on the use of modeling and monitoring to determine if an area meets the 2010 SO₂ NAAQS.

In the development of this ICR renewal, we consulted with all 10 EPA Regional offices to gather information regarding the sources for which state, local and Tribal air agencies within each region are subject to requirements under the DRR, including which sources such air agencies elected to characterize air quality through modeling. EPA also regularly consults with these air agencies regarding ongoing annual report requirements, as applicable to such DRR sources.

(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:

- Potential hindrance to EPA's ability to conduct national program oversight and meet its statutory obligations to implement the 2010 SO₂ 1-hour NAAQS to ensure public health protections in an efficient and effective manner.
- A national database that is not consistently updated and available for public consumption;
- Less timely nonattainment designations with respect to the NAAQS;
- 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.

(e) General Guidelines

All of the OMB's general guidelines for information collections in 5 CFR 1320.5(d)(2) are met by this ICR.

(f) Confidentiality

Information that is considered personal, private, proprietary, or confidential is not required for this collection. One purpose of collecting emissions information or modeling data is to inform the public of the general quality of ambient air (air considered generally accessible to the public) and, as such, does not present a need for maintaining a confidential nature. In particular, the Clean Air Act specifies that information obtained under section 114 that qualifies as "emission data" is excluded from the category of information eligible for confidential

treatment. Security measures are taken to prevent tampering with the AQS electronic database by limiting the access to the AQS mainframe only to authorized users.

(g) Sensitive Questions

This section is not applicable to this ICR because no information involving matters of a sensitive nature is collected under the DRR.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

(a) Respondents/SIC Codes

This ICR affects state and local governments (SIC code 951, Administration of Environmental Quality Program) that are responsible for air quality management. The 40 CFR part 51 regulations associated with this request require that state and local air quality management agencies on an ongoing basis shall submit annual emissions data reports to the EPA. In some cases, the air agency may need to submit additional updated modeling. For example, updated modeling may be needed from the air agency for an area with recent emissions increases, but which was initially designated as attainment/unclassifiable (or unclassifiable/attainment) on the basis of air quality modeling using actual emissions from an earlier year.

(b) Information Requested for Areas Where the Modeling Option Was Implemented

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

These data items are submitted to EPA's Regional offices as required by the SO₂ 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 SO₂ 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 SO₂ 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 determination that updated modeling was necessary.

(ii) Respondent Activities (Modeling Option)

- Gather the most recent emissions data for source(s) in each area for which ongoing reports are required, include the annual emissions data for such source(s) in the annual report, and compare the new data against the previous emissions data.
- If any emissions have increased from the previous year, determine why emissions have increased and include that reasoning in the annual report.
- Make a recommendation of whether updated modeling is needed to characterize air quality in each source's area to determine whether the area meets or does not meet the 2010 SO₂ NAAQS and include that recommendation in the annual report.
- Submit annual report to EPA after making available for public inspection.
- If emissions have increased to the point that modeling is needed, gather meteorological, emissions, and source characterization data to conduct modeling with the latest emissions following the SO₂ Modeling Technical Assistance Document. Specifically, if updated modeling is required under the ongoing reporting requirements, EPA recommends air agencies use EPA's preferred near-field dispersion model, the AERMOD modeling system.³ 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:

- BPIPPRM 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 SO₂ under the Data Requirements Rule uses:

- Source characterization (including physical stack dimensions and exhaust gas parameters) 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:

³ 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 the appropriate size of the modeling domain to capture potential modeled NAAQS violations
- 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 modeled design concentrations 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

(a) Agency Activities

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

- Review and assess the annual report submitted by the air agency which includes updated emissions information to evaluate 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 questions (state and local air quality management agencies) and questions from industrial organizations, environmental groups, and others about modeling submitted to meet the requirements of the SO₂ DRR, including questions regarding meteorological and emissions data.

(b) Collection Methodology and Management

For air quality modeling, EPA has provided the SO₂ Modeling Technical Assistance Document and the Guideline on Air Quality Models, Appendix W to 40 CFR Part 51, to assist air agencies and ensure that they can successfully use AERMOD to estimate design concentrations 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.

(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 AERMOD modeling platform and operational guidance to improve its accuracy and performance).

(d) Collection Schedule for Annual Data Reports and Potential Modeling Revisions

For areas where modeling of actual SO₂ emissions served as the basis for designating the area attainment/unclassifiable or unclassifiable/attainment for the 2010 SO₂ NAAQs, an annual report is required to be submitted by the air agency to the appropriate EPA Regional Administrator by July 1 of each year that documents the annual SO₂ emissions of each applicable source and assesses the cause of any emissions increase from the previous year, per 51.1205(b). For any areas for which an 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 POTENTIALLY REQUIRED MODELING

(a) Estimating Respondent Burden

States are required annually to update emissions and provide an assessment of the cause of any emissions increase from the previous year to EPA that can be used to determine if an area requires new modeling for use in determining ongoing compliance with the NAAQS. To determine the potential modeling burden for air agencies, we are using a simplified, turnkey estimate (\$22,000 per model run) to estimate the costs (see section 6(b) below) associated with assessing the emissions inventory, generating the annual report, and updating the modeling as required. For cases where the agency is submitting only a report with no revised modeling, the labor burden for respondents is assumed to be 5 percent of the overall turnkey estimate to generate the report.

(b) Estimating Respondent Costs

As noted in section 3(c) of this supporting statement, EPA consulted with all 10 EPA Regional offices to gather information regarding the sources for which air agencies elected to characterize air quality through modeling. EPA Regional offices provided information regarding annual reports of sources from air agencies for those sources subject to the ongoing requirements under the DRR's modeling pathway.

A total of 36 state and local air agencies chose to characterize air quality for one or more sources in their jurisdiction via the modeling pathway, for a total of 137 sources. Based on the annual emissions reports for those 137 sources, EPA could require air agencies to provide additional modeling for some sources as part of their annual reporting obligation if there are significant increases in their year over year emissions. For sources for which EPA does not require additional modeling, air agencies 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, on a "worst-case" basis, that air agencies will be required to provide updated modeling annually for **all** 137 sources, and they will provide these modeling results as part of 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 for a single DRR-applicable source or source area, where additional modeling is determined to be necessary, is \$22,000. This cost estimate also includes the time necessary to update the appropriate emissions inventory and any other input files for the modeling. In the highly unlikely event that air agencies and EPA determined that it was necessary for air agencies to conduct additional modeling for all 137 sources that are subject to the ongoing reporting requirements under the DRR, the total annual national costs to air agencies are estimated at approximately \$3,014,000. For purposes of the burden calculations in this ICR renewal, we are being highly conservative and assuming this "worst case" scenario will occur in each of the three years that this collection will be active. We say this estimate is highly conservative because, since July 1, 2017, when the first annual reports were due, few states have submitted revised modeling. Therefore, the actual respondent burden is likely to be much lower since most air agency submittals are expected to entail an emissions assessment report only with no accompanying modeling.

In instances where additional modeling is not required, our burden estimate for the emissions change assessment and the final report preparation is equal to 5 percent of the overall costs of the full-scale modeling estimate. Should it be the case that none of the 137 sources require new modeling for the duration of this collection, the annual burden cost estimate would thus be \$150,700. This estimate of 5 percent is likely conservative because, in general, the air agency respondent can use the previous year's report as a template and simply update the reported and readily available emissions numbers.

(c) Estimating Agency Burden and Cost

For reports for which EPA determined that updated modeling was required, EPA estimates that, on average, 40 total hours would be needed to review each of the annual reports and the subsequent modeling analysis. If all 137 sources are assumed to update modeling as part of the annual requirement, then 5,480 hours would be the total labor estimate for EPA/OAQPS, the ten EPA Regional offices, and any associated contractor activities. Using a rough average hourly rate of \$100, the average annual agency cost would be \$548,000.⁴ If no modeling is being submitted for any of the 137 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 \$109,600. For total burden estimates below we are conservatively assuming that all 137 sources are submitting modeling and use the upper value (i.e., \$548,000) for the burden.

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

For the modeling option, the average annual respondent cost is \$3,014,000 if modeling is submitted for all 137 sources. This is based on an estimate of \$22,000 per source for a modeling analysis for a DRR applicable source and assumes that 10% of that total cost is for the non-labor burden.

(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Number of Respondents: 36
Number of Annual Responses: 137
Respondent Annual Burden: Number of hours not calculated
Respondent Total Annual Costs: \$3,014,000

⁴ The estimated hourly burden rate of \$100/hour is used as a conservative average estimate of employee compensation rates for a combination of federal and private contractor employees. The June 2022 report from the Bureau of Labor Statistics, "Employer Costs for Employee Compensation," indicates that employee benefits average about 30-40% of salary costs. Thus, as an example, average hourly compensation for an EPA GS-13, step 5 employee in the New York City regional office can be estimated to be $\$59.57 \times 1.4 = \83.40 . Hourly rates for EPA contractors are typically higher. Thus, this ICR uses an estimate of \$100 per hour as a conservative estimate.

(ii) Agency Tally

Agency Total Annual Burden: 5,480 hours
Agency Total Annual Cost: \$548,000

(f) Reasons for Change in Burden

The revised burden associated with this ICR results from the requirements under the SO₂ Data Requirements Rule, updated cost/burden estimates for annual reports with potentially required modeling, and an existing, separate ICR (Ambient Air Quality Surveillance 40 Part 58 ICR) currently covering the burden for the required ambient monitoring. The final rule gave air 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 listed source area which approach (ambient monitoring or air quality modeling) it would use to characterize air quality. Air agencies who chose the monitoring path for a source area began monitoring in 2017. Currently, for those state and local air management agencies that chose monitoring for certain applicable areas, the DRR requires that ongoing monitoring meet the requirements in 40 CFR Part 58. Correspondingly, the Ambient Air Quality Surveillance 40 Part 58 ICR covers all monitoring that began and continues to be required under the DRR.

For the modeling burden estimates, EPA has revised the number of applicable sources from 170 to 137 and has adjusted the burden estimates accordingly. The number of applicable sources changed from 170 to 137 because some states changed the DRR option pathway (e.g. to monitoring from modeling) for certain sources from their original notification to EPA. Also, some sources have ceased operations in the years since the reports were first required, and in certain circumstances EPA approved that emissions reports for these sources are no longer required. A turnkey estimate of \$22,000 is used for the burden estimate for updated modeling versus the \$30,000 estimate that was used for the 2019 ICR renewal. The new, lower number for this renewal is based on the fact that most of the model input files are simply updated files, and were not created from scratch, which was the case for the original modeling. That is, for any revised modeling required for reports due during the time period covered by this ICR renewal, the input files will likely not need to be recreated wholly from scratch; they are merely updated with new emissions or meteorological inputs before rerunning the model. This efficiency results in the lower cost per source.

Finally, since the first reporting due date of July 1, 2017, air agencies resubmitted modeling using allowable emissions for a few sources and thus these sources became exempt from further reporting requirements. Because there are now fewer sources for which air agencies must submit annual emissions reports, it also reduces the estimated overall cost burden since we are accounting for 33 fewer sources compared to the previous ICR renewal. Although the overall burden is reduced compared to the prior renewal, the estimates are still conservative and therefore on the high end due to the assumption that all agencies will need to re-model for all sources, when in fact, based on their review of updated emissions data, a new modeling run may not be required. EPA will continue to work closely with air agencies and update burden estimates as appropriate in future ICR renewals.

(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information for state and local air agencies who may be subject to modeling, 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.

Submit written comments and recommendations to OMB for the proposed information collection within 30 days of publication of this notice to www.reginfo.gov/public/do/PRAMain. Find this particular information collection by selecting "Currently under 30-day Review - Open for Public Comments" or by using the search function.

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.