AIR STATIONARY SOURCE COMPLIANCE AND ENFORCEMENT INFORMATION REPORTING (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Air Stationary Source Compliance and Enforcement Information Reporting (Renewal), EPA ICR Number 0107.14, OMB Control Number 2060-0096.

1(b) Short Characterization/Abstract:

Air Stationary Source Compliance and Enforcement Information Reporting is an activity whereby State, Local, Tribal, Territorial, and Commonwealth governments (hereafter referred to as "delegated agencies") report air stationary source compliance and enforcement information to the U.S. Environmental Protection Agency (the EPA or the Agency) on a regular basis. The information is provided to the EPA via input to the Integrated Compliance Information System (ICIS). ICIS contains compliance and enforcement information on thousands of facilities regulated under numerous federal statutes including the Clean Water Act – National Pollutant Discharge and Elimination System (NPDES) program. The modules within ICIS that are used to report air related data are collectively referred to as ICIS-Air. Agencies receive delegation of the CAA through regulated grant authorities, and report compliance/enforcement activities undertaken at stationary sources pursuant to the minimum data requirements as outlined in this ICR. The majority of delegated agencies maintain their own data system and extract data from it and report it to ICIS-Air using either electronic data transfer (EDT) or manually ("direct entry"). A small number of delegated agencies use ICIS-Air exclusively, since they have no internal air compliance and enforcement database. The information provided to the EPA includes source information, compliance monitoring activities, violation determinations, and enforcement activities. The EPA uses this information and information from other data systems, such as the Compliance and Emissions Data Interface (CEDRI) to assess the health of the compliance and enforcement program established under the Clean Air Act (CAA), to perform oversight activities of delegated agencies, and to provide public transparency about activities and findings related to compliance and enforcement at individual facilities or aggregated categories of facilities. The EPA also uses ICIS-Air to record comparable federal activities to support program management and transparency.

The active (previous) ICR had the following Terms of Clearance (TOC):

> "Because the number of responses is not changing, the total burden has been returned to what was approved in the prior ICR renewal. If the agency wants to change the burden hours for future renewals, the agency

is requested to clearly indicate what was one time burden from the transition of AFS to the ICIS-Air system and what is ongoing burden. For the ongoing burden hours, the agency is requested not to arbitrarily change the burden estimate unless the case can be made that the agency made a mistake in the prior time burden estimate or that there are fewer responses than the agency originally estimated."

As stated in Section 6.a. of the supporting statement for a prior ICR renewal (EPA ICR Number 0107.11), the one-time burden associated with transition from the AFS system to ICIS-Air was estimated to be 46,500 hours. The remaining amount (4,913 hours) was estimated to be the ongoing burden for reporting to ICIS-Air. However, the supporting statement for EPA ICR Number 0107.11 stated that calculating burden associated with ICIS-Air electronic data transfer was very difficult at that time, because less than ten agencies had successfully transferred data to ICIS-Air between the time it was put into production (October 27, 2014) and the time when the ICR Number 0107.11 was being developed. In order to improve or correct the previous estimated burden for ongoing reporting to ICIS-Air, the EPA has conducted consultations with delegated agencies for both the previous ICR renewal (0107.12) and this ICR renewal (0107.14). Based on the results of these consultations, we have estimated a decreased annual burden from the earlier estimate of 51,413 hours as described in Section 6 below.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

(i) Authority

The CAA calls for state, local, federal and tribal governments to implement the Act in partnership with EPA to reduce pollution. It is well understood that working closely with government partners leads to better programs that are more effective and efficient. For regulatory programs, EPA often has discussions early in the rulemaking process with government partners (federal, state, local and tribal) and with interested parties such as affected industries, environmental groups, and communities. After a rule is complete, EPA works with government partners and stakeholders to achieve effective implementation. This ICR supports the partnership established for CAA program implementation by facilitating regular information exchange. Section 114(a)(1) of the CAA, 42 U.S.C. §7414(a)(1), establishes that EPA may request information on a one-time, periodic or continuous basis for the purpose of carrying out any provision of the Act. Individually, certain provisions of the Act and its implementing regulations include specific language for the collection of some of the information requested by this ICR. For example, 110(p) of the CAA, 42 U.S.C § 7410(p), establishes that EPA may request information to assess the implementation of any state implementation plan. 40 CFR § 70.4(j)(1) (Title V) requires that any information obtained or used in the administration of a Title V permit program be available to EPA. This ICR encompasses this information in addition to information that assists with carrying out additional provisions of the Act. Related provisions include but are not limited to New Source Performance Standards (NSPS) in 40 CFR Part 60, National Emission

Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61 and Part 63, and New Source Review (NSR) permitting regulations in 40 CFR Part 51 and Part 52. The periodic reporting of regulated source information, compliance monitoring, violation determination, and enforcement information is the subject of this renewal ICR.

(ii) General Need for the Data

The national air stationary source compliance monitoring and enforcement program promotes effective, cooperative, and coordinated efforts among the EPA and the delegated agencies. The Agency recognizes the primary role of the delegated agencies in the prevention and control of air pollution. But, the CAA requires that EPA regularly monitor delegated agencies to ensure adequate implementation and enforcement of delegated and authorized programs. To do this, the EPA has identified the minimum amount of data or the Minimum Data Requirements (MDRs) it believes are necessary to manage the national air stationary source compliance monitoring and enforcement program within this ICR. Reporting the MDRs, which are listed in Table 1 in Section 4(b), is critical in order to:

- Manage the national CAA compliance and enforcement program to ensure effectiveness and consistency;
- Oversee state/local/tribal efforts and assess progress in achieving protection of the environment and public health;
- Target compliance activities and enhance ability to use advanced monitoring tools;
- Improve efforts to achieve health and environmental benefits envisioned by our regulations and permits;
- Increase transparency and meet public expectations for readily accessible and detailed information; and
- Provide complete and timely responses to inquiries (e.g., Congress, OMB, public).

In addition to the regulatory infrastructure the data supports, it also allows the Agency to effectively implement our compliance and enforcement guidance and policies. These are:

- The Clean Air Act Stationary Source Compliance Monitoring Strategy, July 14, 2014 (CMS) – The CMS establishes a baseline compliance monitoring program with emphasis on CAA Title V major sources (as defined by CAA §501(2)) and a limited subset of synthetic minor sources, while providing delegated agencies with the flexibility to address local air pollution and compliance concerns. The CMS also establishes a framework of minimal data requirements for reporting to the EPA. Data included in this ICR is a critical component of the implementation of the CMS.

- The Clean Air Act National Stack Testing Guidance, April 27, 2009 – The EPA developed the stack testing guidance to improve uniformity in conducting stack tests and promote coordination among the EPA and delegated agencies. ICIS-Air is the Agency's repository for stack test data regarding compliance with CAA regulations.

- The Guidance on Federally-Reportable Violation for Clean Air Act Stationary Sources, September 23, 2014 (FRV policy)– The EPA developed the 2014 FRV policy to balance a commitment to share information with the public about violations of CAA regulations that affect their communities with the need to prioritize the use of limited resources available to delegated agencies. The FRV policy supports the Agency in managing the national CAA compliance and enforcement program. ICIS-Air is the Agency's repository for data pertaining to federally reportable violations, which are violations of federally enforceable regulations.

- The Enforcement Response Policy for High Priority Violations of the Clean Air Act, August 25, 2014 (HPV policy) – The EPA developed the 2014 HPV policy to help Federal, state, local and tribal delegated agencies prioritize enforcement efforts with respect to sources of air pollution. The HPV policy addresses a subset of federally reportable violations, called high priority violations (HPVs), that the Agency believes warrant additional oversight. The additional oversight serves to ensure that state and local agencies respond to such violations in a timely and appropriate manner and, if needed, have access to federal assistance. ICIS-Air fully supports reporting HPV activity: the discovery action, notice/advisement provided to the regulated entity, addressing the violation, and resolution of the violation and enforcement action. Reporting of HPVs serve a dual purpose of also informing local communities and members of the public about priority compliance problems that are self-reported or identified via governmental monitoring activities.

Data concerning stationary source compliance monitoring and enforcement programs is critical to conducting oversight of delegated agency compliance and enforcement programs. The EPA Office of Enforcement and Compliance Assurance (OECA), the Environmental Council of States (ECOS), state media associations, and other delegated agency representatives developed a State Review Framework (SRF) for conducting consistent reviews of core monitoring and enforcement activities pursuant to the CAA, Clean Water Act (CWA), and the Resource Conservation and Recovery Act (RCRA) programs. These SRF reviews were initiated in 2004 and have occurred in cycles. The data reported to ICIS-Air is paramount for these reviews. Each review begins with an analysis of data metrics to identify any obvious trends or issues. The SRF reviews are a platform for collaborative problem-solving regarding compliance monitoring, enforcement, and data management.

2(b) Practical Utility/Users of the Data

There are many ways in which the EPA, delegated agencies, and the public use the data included in this ICR. As stated previously, the MDRs represent the minimum amount of data the Agency believes is necessary for effective management of the national air stationary source compliance monitoring and enforcement program. Some of the key uses of the data on a national basis are to:

- Provide an accurate and accessible inventory of sources subject to federally enforceable

regulations;

- Support efficient and effective targeting and enhanced enforcement strategies;

- Provide the public with transparent access to compliance monitoring and enforcement data, while providing facilities with an incentive to fix compliance problems;

- Support essential oversight activities;

- Assist in identifying national trends and issues related to the CAA;

- Develop measures of regulatory program success;

- Communicate performance and results on a national, regional, sector, or other level;

- Standardize delegated agency reporting to EPA;

- Assist regulatory analyses and design of new regulations;

- Support multimedia initiatives which integrate quarterly reports of air, water, and land compliance data;

- Provide timely and accurate response to information requests made by citizens, the regulated community, Congress and other information requesters; and

- Provide a forum and model of successful delegated agency compliance programs (that include Federal data reporting) which can be used by other agencies in the development or expansion of their existing programs.

2(c) About ICIS

ICIS is a data system designed to track compliance and enforcement information. It is a modern web-based system which provides easy access to historical and current records for the EPA, and state/local/tribal agency staff involved in compliance and enforcement activities. Within ICIS, there are data modules specifically for reporting compliance and enforcement data pertaining to activities related to the CAA. These modules are collectively referred to as ICIS-Air. The following are important facets of ICIS-Air:

- Provides both electronic submission and Graphical User Interface (GUI) capabilities.
- Provides modern and streamlined methods for electronic transfer of data.
- Implements robust security features to ensure the integrity of the software and data, protect confidentiality of data, and maximize availability to users.
- Adheres to the EPA standards for software and hardware development, including the use of the Central Data Exchange (CDX) and EPA/ECOS data standards.

- Supports all baseline MDRs necessary to conduct the national air stationary source enforcement and compliance assurance program.
- Contains a set of streamlined data entry screens with maximized system-generation of data based on user permissions and types of records being reported.
- Auto-populates data fields to the greatest extent possible based on the record type being added or type of agency (e.g., state) associated with the user adding the record.
- Includes drop-down menus of values and type-ahead functionality wherever possible to facilitate entry of information, provide greater consistency in data entry, eliminate the need to refer to multiple lists of regional action types, and improve overall data quality.
- EPA is beginning to work on a modernization effort for ICIS, that will likely provide ICIS-Air with additional modern and efficient functionality.

3. Non-Duplication, Consultations, and Other Collection Criteria

3(a) Non-Duplication

The MDR elements outlined in Table 1 of Section 4(b) represent minimum data requirements for effective implementation and management of a national compliance and enforcement program. For EPA and the public, the ICIS-Air data is the only national repository of information collected from delegated agencies on CAA stationary source compliance and enforcement activities. Therefore, duplication does not exist. This ICR relates to information that delegated agencies generally collect as part of their customary business practice to manage their compliance and enforcement programs. Some delegated agencies use ICIS-Air as their sole data system for managing the MDRs and other data elements, while others have their own data management systems and report information they manage in their own system to ICIS-Air. Roughly one-third of the reporting delegated agencies report data using electronic data transfer (EDT).

Agencies that report data to ICIS-Air via EDT submit their data in Extensible Markup Language (XML) format. To facilitate the submission of data, node plug-ins have been developed for agencies to extract the data requested by this ICR and convert it into XML submission files that are submitted to ICIS-Air via the EPA's Central Data Exchange (CDX).

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (87 FR 52552) on August 26, 2022. The EPA solicited comment on several options for improvements to the integration of ICIS-Air and CEDRI information in order standardize the facility identification process so that data can easily be shared across systems. Specifically, the EPA solicited comment on:

- whether it would be beneficial for the EPA to import facilities from CEDRI into ICIS-Air that are currently not found in ICIS-Air and create a means to link those

facilities for purposes of more comprehensive compliance tracking.
- how data within the CEDRI reports could be provided to ICIS-Air to reduce the need for overlapping data entry in ICIS-Air.
- the utility of future functionality that would automatically flag situations within ICIS-Air when a CEDRI compliance report is due, but not received by the deadline.
- whether delegated agencies that do not currently provide Title V Certifications to CEDRI plan to do so in the near future.
- whether we should consider requiring that violations have a linkage to a discovery action, or CEDRI ID number, so that ECHO users can understand the activity that led to the violation finding(s).
- whether we should consider, in the future, developing a new reporting approach for delegated agencies that provide the CEDRI document ID to limit potential duplicate data entry.
- for where the agency collects bi-weekly benzene fenceline monitoring data from refineries, when deficiencies are noted that require follow-up actions by the facility, whether those deficiencies should be populated into ICIS-Air and shared via ECHO.
- the effectiveness of the current process of making performance reports directly from regulated entities accessible through the Agency's WebFIRE website and suggestions for improvements,

EPA received three comments, two of which responded to topics about which the EPA solicited comments in the *Federal Register* notice (87 FR 52552). The remaining comment was unrelated to the data requirements or burden associated with this renewal. Of these, one commenter was supportive of importing facilities from CEDRI into ICIS-Air that are not currently found in ICIS-Air and described how this would potentially affect this reporting agency. The second commenter was not supportive of importing facilities from CEDRI into ICIS-Air, and stated that this could result in additional errors, inaccurate compliance tracking, and additional complexity to the reporting structure, exacerbating existing challenges associated with correcting inaccurately reported data. The EPA has considered the small set of public comments received on these options in this renewal and is not making any changes to the MDR requirements or the ICIS-Air reporting process at this time.

One commenter stated that they do not currently review any documents submitted through CEDRI, and further stated that if EPA could design the systems in a way that would allow delegated agencies to populate information directly from CEDRI and/or ICIS-Air, then this would lessen the reporting burden on facilities. The commenter would be supportive of this change. The commenter stated that their Agency would need to develop a more robust filing system to accept electronic reports from CEDRI. Additionally, the commenter does not believe that data exists in CEDRI that does not exist in ICIS-Air, and stated that if CEDRI automatically reported to ICIS-Air, then this would create duplicate entries, because the delegated agency is not currently reviewing the CEDRI reports. The commenter stated that the data that would be most beneficial to share would be the CFR citation for the report being submitted and the date

that the report was submitted. That would ensure that any report the commenter receives outside of CEDRI can be accounted for to avoid duplicates. The EPA has considered these comments and is not making any changes to the MDR requirements or the ICIS-Air reporting process at this time, but may consider this comment in future reporting approach enhancements.

Regarding the utility of future functionality that would automatically flag situations within ICIS-Air when a CEDRI compliance report is due but not received by the deadline, one commenter indicated they would not want the burden of providing over 2,000 due dates to CEDRI when they are already tracking this internally. However, the commenter also stated that if CEDRI already maintains these due dates, then it would be beneficial to both the delegated agency and facilities. The EPA will consider this comment in future reporting approach enhancements and is not making changes at this time.

One commenter indicated that they requested facilities to submit their Title V Certifications through CEDRI at EPA's request, but the delegated agency does not require it. The commenter is not opposed to accepting reports submitted through CEDRI once an electronic filing system is implemented, and the commenter's understanding is that if a report is submitted through CEDRI it meets the CROMERR requirements and could be accepted by the State.

Regarding whether or not EPA should consider requiring that violations have a linkage to a discovery action, or CEDRI ID number, so that ECHO users can understand the activity that led to the violation finding(s), one commenter stated linkages should only be required for High Priority Violations. The commenter explained that as a best practice, they link other violations to discovery actions if a specific discovery action is a federally reportable action or already required to be reported to ICIS-Air. The EPA will consider these comments in future updates to these reporting systems. One commenter opined that it is not a valuable use of resources to provide CEDRI document ID to EPA when that information should already be available to EPA directly from CEDRI. The EPA will consider this comment in future reporting approach enhancements, but is not making changes at this time.

Regarding the effectiveness of the current process of making CEDRI performance reports accessible through the Agency's WebFIRE website, one commenter stated that they receive very little benefit from CEDRI/WebFIRE performance tests due to inconsistent formats and the limited number of rules that require electronic submittal of test reports. The commenter indicated that requiring a consistent format for submittal of reports could alleviate duplicative nature of reviews. The EPA considered this comment and is not making changes to the MDR or ICIS-Air reporting process as a result of this comment, but may consider this comment in future reporting approach enhancements.

Finally, one commenter indicated that it would be extremely beneficial to have a common numbering protocol between ICIS-Air and CEDRI. The commenter stated that they do not track the EPA Facility Registry Identifier in their internal database, but it could be done if there is a benefit in tracking reports. The EPA will consider this comment in future reporting approach enhancements and is not making changes at this time.

3(c) Consultations

The Agency has consulted delegated air agencies in order to collect annual estimates of the relative time to report the minimum data requirements to ICIS-Air. The Agency consulted a total of nine delegated agencies, including four "small" agencies (agencies reporting for 150 or fewer major sources) and five "large" agencies (agencies reporting for greater than 150 major sources). Of the nine delegated agencies, two report to ICIS-Air via EDT, three report via direct, online data entry, and four report via a hybrid approach using both EDT and direct, online data entry. The feedback EPA received is summarized in Section 6(a) Estimating Respondent Burden.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. The comments received and our responses may be found in Section 3(b) above.

3(d) Effects of Less Frequent Collection

During this ICR renewal process, the EPA is not implementing any changes to the reporting timeframes. EPA expects that for any reportable activity, the associated MDRs will be reported within 60 days of the date of the activity.

If the EPA received data less frequently (e.g., quarterly), there would be an adverse impact on the collaborative process for conducting compliance monitoring evaluations and ensuring violations discovered are addressed and resolved timely. In addition, the timeliness of making this information available to the public would suffer. The lack of timeliness would create a specific data quality concern, additional to any other known data quality concerns.

3(e) General Guidelines

This information collection contains no special circumstances that would conflict with the general guidelines in 5 CFR § 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see also 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 42251, September 20, 1978; and 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

This information collection does not include sensitive questions.

4. The Respondents and the Information Collected

4(a) Respondents/SIC Codes

The respondents for the information collection activity are state, local, territorial, and tribal delegated agencies. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 9511 which corresponds to the North American Industry Classification System (NAICS) 924110 for Administration of Air and Water Resource and Solid Waste Management Programs. Source compliance data assembled by delegated agencies covers numerous NAICS categories. The total number of respondents is 117 (50 states, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, the Mariana Protectorate and 62 local or tribal air pollution control agencies). The classification of small and large agencies is made based upon the number of major sources included in their federally reportable universe: less than or equal to 150 major sources is defined as a small agency; 151 or more major sources is defined as a large agency. In addition to major sources of which there are 14,344 active as of the drafting of this ICR, these delegated agencies track a significant number of non-major sources that are federally reportable (including 27,060 synthetic minors).

The list of agencies by category can be found in Appendix 1, Delegated Agency Classification by Size.

4(b) Information Requested

(i) Data Items

Reporting: To manage the national air stationary source compliance monitoring and enforcement program, the EPA provides a set of MDRs that identify the specific data elements to be reported and tracked in ICIS-Air. The list of MDRs as reported to ICIS-Air is found in Table 1, MDRs for Renewal. The data elements include source information, compliance monitoring activities, violation determinations and enforcement actions. Activities can be reported as either planned or completed. In general, the completed or concluded date is the relevant date for this ICR. Minimum reportable activities include compliance evaluations, investigations, performance tests and results, informal enforcement actions, and formal enforcement actions. The following section describes each of these data elements.

A facility[1] is a stationary source, containing one or more pollutant-emitting units. It includes portable sources, which are stationary sources that can be moved from one physical location to another, such as an asphalt processing plant. Each facility is associated with one delegated agency. The delegated agency is identified by a unique combination of characters embedded in a facility's Programmatic Identifier. In ICIS-Air a facility record must exist before users can enter data for activities associated with that facility such as compliance evaluations and enforcement actions. Activities are to be reported when they occur at a facility that is part of the federally reportable universe, which is comprised of all:

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1 The terms facility and source are used interchangeably throughout this ICR.

- Title V major sources,
- Synthetic minor sources,
- Sources subject to a Part 61 NESHAP regulation,
- Facilities included in a CMS plan,
- Facilities subject to a formal enforcement action, and
- Facilities with an HPV.

The Agency is aware that the federally reportable universe included in this ICR differs from the universe of sources generally covered by the CMS, FRV and/or HPV policies. The CMS policy focuses on Title V majors and 80% synthetic minor sources[2], the FRV policy sets the universe of sources at which FRVs are to be reported to Title V majors, 80% synthetic minors, sources on a CMS plan, and any source with an HPV; and the HPV policy generally applies to Title V majors. This difference will result in compliance monitoring activities and enforcement actions being reported for some sources not covered by these policies. For purposes of reporting universes into ICIS-Air, it is essential that the national database have a complete record of all those facilities in the six categories above.

Compliance monitoring activities are evaluations of the compliance status of the facility. These activities include compliance evaluations (both partial and full), investigations, performance tests, and receipt and review of Title V annual compliance certifications.

A compliance evaluation generally includes:

- A review of all required reports and the underlying records;
- An assessment of air pollution control devices and operating conditions;
- Observing visible emissions;
- A review of facility records and operating logs; or
- An assessment of process parameters, such as feed rates, raw material compositions, and process rates.

After a compliance monitoring activity is conducted, a review of all acquired materials against the regulatory framework and/or permit is conducted to determine if any violations occurred. The 2014 FRV and HPV policies discuss when a violation is to be reported to ICIS-

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2 From the 2016 Clean Air Act Stationary Source Compliance Monitoring Strategy Policy: Synthetic minor sources that emit or have the potential to emit (PTE) at or above 80 percent of the Title V major source threshold (SM-80s). For purposes of this policy, PTE means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable or legally and practicably enforceable by an air pollution control agency of a state/local/tribe/territory. The 80 percent threshold was selected to ensure that those facilities that either have the potential to emit or actually emit pollutants close to the major source threshold are evaluated periodically. This enables states/locals/tribes/territories to focus resources on those facilities that are most environmentally significant. In determining whether a synthetic minor source falls within the scope of this policy, all facilities with the potential to emit at or above the 80 percent threshold are included regardless of whether their actual emissions are lower. If a state/local/tribe/territory does not differentiate facilities based on potential to emit, all synthetic minors should be designated as SM-80s.

Air. The agency performing the compliance monitoring activity should be reporting violations at the time the determination is made and should not wait for the next Full Compliance Evaluation to enter alleged violations to the national database. To report a violation, delegated agencies must first create a Case File activity. Within the Case File, violations are reported by selecting a violation type and air program violated (e.g., New Source Performance Standards). Some violation types also require a pollutant (e.g., Violation of an Emission Limit). FRVs include violations of federally enforceable rules and regulations, which include all limitations and conditions that are enforceable by the Administrator and citizens under the CAA or that are enforceable under other statutes administered by the Administrator.

If a FRV determination is made, then typically a source is notified of such findings via an informal enforcement action. An informal enforcement action notifies or advises the recipient of apparent deficiencies, findings concerning noncompliance, or that the issuing agency believes one or more violations occurred at the referenced source and provides instructions for coming into compliance. An informal enforcement action offers an opportunity for the recipient to discuss with the issuing agency actions they have taken to correct the violations identified or provide reasons they believe the violations did not occur. An informal enforcement action may include reference to an issuing agency's authority to elevate the matter, and/or liability of the recipient to pay a penalty. These data are intended to ensure that the delegated agency informs the source as soon as possible of the agency's findings so that the source is on notice of the need to promptly correct conditions giving rise to the violation(s) or potential violation(s).

A formal enforcement action either requires that a person comply with regulations, requirements, or prohibitions established under the CAA; sets compliance schedule with milestones, requires payment of a penalty or establishes an agreement to pay a penalty; initiates an administrative procedure (e.g., file a complaint) or civil action (e.g., referral); or constitutes a civil action. Generally, these actions are referred to as complaints, settlement agreements, compliance or penalty orders, referrals, consent agreements, or consent decrees. In other words, formal enforcement actions have legal consequences if the source does not comply. All facilities subject to formal enforcement are to be tracked in ICIS until the resolution of the enforcement action, regardless of classification.

Record keeping: Data provided to the EPA by delegated agencies will be maintained by the EPA in ICIS-Air and, when appropriate, transferred to the National Archives and Records Administration. Delegated agencies may be required to report or review compliance reports within other data systems, such as the Compliance and Emissions Data Interface (CEDRI); however, the findings/results of that review of information within other data systems are recorded in ICIS-Air. EPA is working on improving the connections between CEDRI and ICIS-Air so that reports and data can be cross-referenced. Any changes in burden due to improvements to the connection between CEDRI and ICIS-Air will be reflected in future ICR renewal requests.

(ii) Respondent Activities

The respondent (i.e., delegated agency) activities associated with reporting of compliance and enforcement actions include:

1. Processing, compiling, and reviewing information for accuracy and appropriateness;
2. Transmitting information for entry into ICIS-Air, including any necessary changes to delegated agency data systems to facilitate the transfer of MDRs; and
3. Affirming that the data has been transmitted accurately

These tasks generally are to be performed on a 60-day basis. Most of the burdens under Activity 1 are designated as Customary Business Practice, because the delegated agencies collect a majority of the information required by the EPA for their own program management purposes.

Record Retention: Delegated agencies should maintain MDR data in ICIS for at least five (5) years with the exception of data pertaining to HPVs. Sources with HPVs are to be kept in ICIS-Air indefinitely regardless of operating status. In addition, ICIS-Air users may delete data from the system that is no longer valid or that pertains to sources that are no longer federally-reportable or are permanently closed.

TABLE 1

ICIS-AIR: REPORTING MINIMUM DATA REQUIREMENTS – DELEGATED AGENCIES

This table shows provides the CAA stationary source compliance and enforcement minimum data requirements (MDRs) and where they are reported in ICIS-Air.

In some instances, there is a difference between reporting requirements for web entry and electronic data transfer (EDT) in ICIS-Air. An example is an activity identifier. In ICIS-Air, agencies that will report using EDT will provide an activity identifier for each activity reported, agencies that will report via the web will have an activity identifier generated for them. This difference exists to allow EDT agencies to report an identifier generated by their state or local agency system. In this table, agencies that will report via the web are referred to as "web agencies," and agencies that will report using EDT are "EDT agencies."

Notes Regarding Other EPA Data Systems:

ICIS-Air and other compliance management systems such as ECHO may reference or import other data reported, for example sub-facility/stack information, permit information or identification data that allows the integration of ICIS-Air data with compliance reports. EPA is working to integrate various data collections to ensure that duplicate reporting is not required.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
Source Information
Source/Facility Record	Facilities	Required Data Fields	A facility is a stationary source of pollutants including portable stationary sources. All sources included in the federally reportable universe are to be reported.
	Facility ID	Programmatic ID	The Program ID is 18 alphanumeric characters comprised of the State or Tribe, LCON (where applicable), and 13 characters unique within the reporting agency. A facility is uniquely defined by its Programmatic ID. The Programmatic ID is provided by the delegated agency.
	Facility Name	Facility Site Name	The Facility Name would indicate the environmental relevance of the facility or reference the regulated activities (e.g., Joe's Widget Manufacturing Facility). Name changes should be reported as soon as they are known.
	Street	Address	The address reported is the physical address of a facility. This is the address of the location where the emissions occur; not, for example, the corporate headquarters. If no physical address exists, delegated agencies may report a PO Box along with a latitude and longitude for the physical location of the facility.
	City	City (GNIS City Code or City Name)	The city can be reported in the City free text field or in the City Name (GNIS) field using the GNIS Feature ID. If no city is available, a

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Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			corresponding value indicating such should be provided in the City text field (e.g., No City) with an accurate latitude and longitude reported.
	State	State	The postal state code that corresponds to the state in which the facility is physically located.
	County	County Name (GNIS)	A county is required if the City text field is used to report the City. If the City Name (GNIS) is used to report the City, the county will be set based on the City Name (GNIS) reported.
	Zip Code	Zip Code	The zip code that corresponds to the physical location of the facility.
	NAICS Code	Primary NAICS Code	The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments. NAICS are assigned based on a facility's primary business activity. A complete and valid NAICS code contains six digits.
	Government Ownership	Facility Type of Ownership	Facility Type of Ownership reflects whether the facility is privately owned or owned by different levels of government. Although identification of the owner/operator can be defined down to the municipal level, at a minimum any federally owned/operated facility should be identified.
Air Programs	All Applicable Federally-Enforceable Air Program(s)	Required Data Fields	Air programs are CAA regulatory programs (e.g., Title V permits). All applicable air program codes are to be reported, but a plant should have at least one air program. Programs that are not delegated or enforced by a state or local agency are not required to be reported by delegated agencies (e.g., Mandatory GHG Reporting Rule, CFC Tracking (CAA Title VI)). EPA should report these air programs, where applicable.
	Air Program	Air Program	An Air Program code represents a CAA regulatory program applicable to a facility. In cases where state or local regulations are stricter than federal regulations, reporting of the federal air program is sufficient. Another option available to delegated agencies is to report a general "Federally-Enforceable Requirement" and provide a state or local regulatory citation in a free text field. Typically state and local permits identify the permit conditions that are federally-enforceable. So, this information is readily available.
	Air Program Operating Status	Air Program Operating Status	An operating status must be reported for each air program. The Operating Status represents the operational condition of the unit(s) or processes to which the air program applies or the operational condition of the facility.
	Subparts for NSPS, NESHAP, MACT	Subparts	A subpart is associated with an air program. A subpart is required for NESHAP Part 61 regardless of facility classification. A subpart is required for NESHAP Part 63 and NSPS if the facility is a Title V major. Part 63 and

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			NSPS subparts are optional but encouraged for any non-major facility. Where Subpart A – General Provisions are incorporated into a source specific subpart wholly or by reference, delegated agencies do not also have to report Subpart A as an applicable Subpart.
Pollutants	Regulated Pollutant(s) by Air Program	Required Data Fields	All pollutants for which a source is regulated should be reported.
	Pollutant Code or CASN	Pollutant Name or CASN	Pollutants reported include those for which a source is regulated.
	Pollutant Classification	Delegated Agency Pollutant Classification	Pollutant classification indicates the rate at which a facility can potentially emit a pollutant. A pollutant classification is required for each pollutant. If a classification is not applicable, agencies may report "Not Applicable" as the classification.
CMS Record	CMS	Required Data Fields	The CMS Record identifies sources that are included on a CMS plan. This data is only reported for sources that are included on a CMS plan.
	CMS Source Category	CMS Source Category	The Source Category corresponds to the category defined by the CMS policy in which a facility is assigned based on its potential to emit (PTE). For the purposes of the CMS policy, PTE is the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.
	CMS Minimum Frequency Indicator	CMS Minimum Frequency	The Minimum Frequency is the minimum number of federal fiscal years recommended between full compliance evaluations at a source covered by the CMS policy. If the CMS policy includes a recommended minimum frequency for the CMS Source Category applied to the facility, the CMS Minimum Frequency will default to the policy recommended minimum frequency on the web. Delegated agencies may overwrite the Minimum Frequency. EDT agencies must submit the Minimum Frequency, it will not default.
Minimum Reportable Activities			
FCE Record	FCEs	Required Data Fields	A Full Compliance Evaluation (FCE) is a comprehensive evaluation of a facility. All FCEs should be reported.
	Facility ID	Programmatic ID	ICIS-Air users must associate the FCE to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency/On or Off Site)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, ICIS-Air users must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific type of compliance evaluation performed. If any component of the evaluation was performed on-

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			site, the FCE should be reported as on-site.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date	The actual end date is the date the reported activity occurred.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
PCE Record	PCEs	Required Data Fields	A Partial Compliance Evaluation (PCE) is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. PCEs are only required when they are a discovery action for an HPV or are included in a CMS alternative plan.
	Facility ID	Programmatic ID	Delegated agencies must associate the PCE to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency/On or Off Site)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation,). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed. If the PCE was conducted on-site, a delegated agency can report the specific evaluation activity conducted (e.g., PCE On-site Interview).
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date	The actual end date is the date the reported activity occurred.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Investigations	Investigation Conducted	Required Data Fields	An investigation is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. All investigations conducted should be reported.
	Facility ID	Programmatic ID	ICIS-Air users must associate the investigation to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date (for Investigation Conducted)	For an investigation, the Actual End Date corresponds to the date the investigation concluded.
		Actual Start Date (for Investigation Initiated)	Delegated agencies can optionally report the Actual Start Date to identify when the Investigation was initiated (this is required for EPA). If the only the Actual Start Date is reported, the record will be enforcement sensitive.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Stack Tests	Stack Tests Conducted	Required Data Fields	A stack test, also referred to as a performance or source test, measures the amount of a specific regulated pollutant, pollutants, or surrogates being emitted; demonstrates the capture efficiency of a capture system; or determines the destruction or removal efficiency of a control device used to reduce emissions at facilities subject to CAA requirements. All stack tests conducted for demonstrating or determining compliance with federally-enforceable requirements should be reported.
	Facility ID	Programmatic ID	ICIS-Air users must associate the stack test to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Who Conducted/Who Observed, Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, ICIS-Air users must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed.
		Conducted By	Conducted By indicates who performed the test or contracted with a third party to perform the test. Since the majority of stack tests reported for compliance purposes are conducted by the owner/operator, the value defaults to owner/operator on the web. Delegated agencies may overwrite this value. EDT agencies must include this in their submission, it will not default.
		Observed By	Observed By indicates whether the delegated agency or EPA was on-site during the test to observe its performance. If an agency was present during the test, delegated agencies should select the agency.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date	The actual end date is the date the stack test was completed.
	Test Results/Finding (Pass, Fail, Pending)	Stack Test Status	The status corresponds to whether the measured results indicate the unit was able to meet the emission, parameter or surrogate limit measured; or capture, destruction or removal efficiency required.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring	The identifier is unique for every record in ICIS. It allows agencies to easily

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
		Identifier	and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
TV ACC Due/Received	All TV ACCs	Required Data Fields	The Title V permitting program (Part 70) requires that a compliance certification be submitted not less than annually. All compliance certifications should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the TV ACC to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type – TV ACC Due/Received (Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation); for EDT the Compliance Monitoring Activity Type for TV ACC records will be generated based on the XML submission type.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed. The TV ACC Due/Received indicates the date the compliance certification is due and the date it is received. There are instances where a source is required to submit quarterly or semi-annual certifications. In these instances, all compliance certifications received are to be reported. When multiple compliance certifications are submitted, it is recommended but not required that the delegated agency report the Certification Period in order to show that the full year was covered by the certifications.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Due/Received Date	Planned End Date	The Planned End Date reflects the date the Title V Annual Compliance Certification is due to the permitting authority and/or EPA. Where Title V sources submit semi-annual certifications this date should reflect the date each semi-annual certification is due to the permitting authority and/or EPA.
		Actual End Date	The Actual End Date reflects the date the Title V Annual Compliance Certification was received by the permitting authority and/or EPA. Where Title V sources submit semi-annual certifications this date should reflect the date each semi-annual certification was received by the permitting authority and/or EPA.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
TV ACC Review	All TV ACCs	Required Data Fields	All compliance certifications received should be reviewed, and the review should be reported.
	Action Type – TV ACC Review (Lead Agency)	Reviewer Agency	Part 70 requires that a source submit their compliance certification to both the permitting authority and EPA. Both agencies can report the date and results of a review of a compliance certification on the same Due/Received activity record. Therefore, each agency must identify themselves in order to distinguish between multiple reviews.
	Date Achieved (Review action, Lead Agency)	Reviewed on [Date]	The Reviewed on date corresponds to the date the agency completed their review of the compliance certification.
	Deviations? (Finding)	Did Facility Report Deviations?	Part 70 requires that a compliance certification identify each deviation. The reviewer agency reports Yes or No to identify whether the source reported that deviations occurred during the certification period.
Informal Enforcement Actions	Notification of a Violation	Required Data Fields	An informal enforcement action notifies or advises the recipient of apparent deficiencies, findings concerning noncompliance, or that the issuing agency believes one or more violations occurred at the referenced source and provides instructions for coming into compliance. All informal enforcement actions should be reported.
	Facility ID	ICIS-Air Programmatic ID	ICIS-Air users must associate the informal enforcement action to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Enforcement Action Forum	As a result of the structure of ICIS, ICIS-Air users must first identify the type of activity they wish to report (e.g., Judicial Enforcement). Web agencies do this via the Add link. For EDT, the forum for Informal Enforcement Actions will be generated based on the XML submission type.
		Enforcement Action Type	The type of informal enforcement action refers to the method or the vehicle used for notifying a source of a violation. Notification includes any notice of violation required by Section 113 of the CAA or corresponding state, local, or tribal implementation plan as well as other written notices, meetings,

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			teleconferences and electronic correspondence. For HPVs only, the other forms of notice (e.g., teleconference) are to be reported on a Case File, Violation Details as the Method of Advisement and are further referenced below.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Achieved Date	The Achieved Date reflects the date the notice is issued or provided to the source.
	Air Program Code(s)	Programs Violated	The programs violated are the applicable regulations which a facility was determined to have violated. All air programs violated should be reported on the action record.
	Activity Identifier	Enforcement Action Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Formal Enforcement Actions	Formal Enforcement Actions	Required Data Fields	A formal enforcement action addresses or resolves a violation. Generally, these actions are referred to as complaints, settlement agreements, compliance or penalty orders, referrals, consent agreements, or consent decrees. Formal enforcement actions have legal consequences if the source does not comply. All formal enforcement actions should be reported.
	Facility ID	Programmatic ID	ICIS-Air users must associate the formal enforcement action to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Enforcement Action Forum	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Judicial Enforcement). Web agencies will do this via the Add link. For EDT, they must include this in their submission.
		Enforcement Action Type	In order to report a Final Order (e.g., Administrative Compliance Order) users must first create the Enforcement Action Type (e.g., Administrative Order).
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
		Milestones: Actual Date	Milestones reference steps in the enforcement response. The milestones vary depending on the type of enforcement (administrative or judicial). When a complaint is filed it is reported as a milestone on an enforcement action. A referral to the State Attorney General or its equivalent is reported as a milestone on a judicial enforcement action. The date that the milestone occurred must be reported.
	Air Program(s)	Programs Violated	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Enforcement Action Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Final Order	Formal Enforcement Actions	Required Data Fields	The final order is the vehicle which captures a settlement agreement, compliance schedule, penalty assessment, or conditions to return to compliance.
	Activity Identifier	Final Order ID	Because multiple Final Orders can be reported on the same enforcement action type, a Final Order ID is needed to make the record unique. For web agencies, the Final Order ID will be generated when the record is saved. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
	Facility ID	ICIS-Air Programmatic ID	Delegated agencies must associate the Final Order to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Final Order Type	The final order is the vehicle which captures a settlement agreement, compliance schedule, penalty assessment, or conditions to return to compliance, which may include injunctive relief.
	Date Achieved	Final Order Issued Date (Admin) Final Order Entered Date (Judicial)	The Final Order Issued Date is the date the final administrative order (e.g., administrative compliance order, administrative penalty order, or consent agreement) was signed by a delegated authority and/or the recipient source. The Final Order Entered Date is the date the final order is entered by a court.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
	Resolving Action	Air Resolved Date	For violations addressed administratively or through any non-judicial process, resolved means all penalties have been collected, SEPs completed, and the source is confirmed to be in compliance with respect to violations included in the final order. For violations addressed judicially, resolved means a court of competent jurisdiction has entered an order adjudicating the case and the order is final.
	Cash Assessed Penalty	Penalty Assessed to be Paid To:	The Cash Assessed Penalty value is the monetary penalty assessed in the penalty action or settlement offer. A penalty will be required for some enforcement action types, but not all.
Case File	Violation Tracking	Required Data Fields	A Case File must be added for a delegated agency to report a known or alleged violation. A Case File can contain information about more than one violation at a source. Violations should be reported in accordance with the 2014 FRV and 2014 HPV policies. Each of these policies focuses on a subset of federally enforceable violations.
	Facility ID	Programmatic ID	ICIS-Air users must associate the Case File to one facility. The Programmatic ID is the unique identifier for the facility.
	Air Program	Programs	The air program is the applicable regulation that the facility was determined to have violated.
	Pollutant	Pollutants	The pollutant reported is the pollutant that is the basis for the regulation or permit condition that was violated. Multiple pollutants can be reported on a Case File.
	Lead Agency	Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, EPA, etc.).
	Activity Identifier	Case File Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Violation Details	Violation Tracking	Required Data Fields	Violation details provide information about the type of violation that is being alleged.
	Violation	Violation Type	All federally reportable violations should be reported. The violation type indicates whether the violation is an FRV or HPV.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
		Air Program	The air program is the applicable regulation or program that the facility was determined to have violated. Only one air program can be reported per violation type.
		Pollutant	The pollutant reported is the pollutant that is the basis for the regulation or permit condition that was violated. Only one pollutant can be reported per violation type.
	Air Program/Pollutant Compliance Status	FRV Determination Date	The FRV Determination Date is the earliest date that the delegated agency makes the determination that potential violations occurred based on information gathered. ICIS-Air will default the FRV Determination Date to the date the violation details are reported. For more precise tracking of actual start and end dates for violations that have a known duration, users may choose to report the Occurrence Start Date and End Date.
	Date Achieved	HPV Day Zero Date	The Day Zero Date is the earliest date that the delegated agency makes the initial identification of a violation as an HPV. It is the date used to evaluate timeliness of actions in accordance with the HPV policy.
	Informal Enforcement	Method of Advisement	The delegated agency should record on the Violation Details that it advised a source of the violation by entering the method of advisement, which includes: any written notices, meetings, teleconferences, and electronic correspondence. If the initial notice is a Notice of Violation or Warning Letter issued pursuant to CAA § 113(a) or a State or Tribal implementation plan, the notice is to be reported using the Enforcement Action module.
	Date Achieved	Date of Advisement	This corresponds to the date when the facility was initially advised of any violation.
HPV	HPV Pathway	Required Data Fields	These actions are either linked to a Case File or reported on the Case File. When a compliance monitoring activity is linked to or reported on a Case File, it is the discovery action. When a formal enforcement action is linked to a Case File it is the addressing and resolving action.
	Discovery Action	Discovery Action or CEDRI document ID and Date	The activity that led to the discovery of a violation. The Discovery Action can either be a compliance monitoring activity reported to ICIS as such and linked to a Case File, or other options for discovery action can be reported (e.g., self-disclosed). The other options are reported on a Case File. If the delegated agency reviews a CEDRI report and that was the discovery action, that may be reported on the PCE record.
	Addressing Action	Addressing Action/Date	The delegated agency can address a violation using one of the following

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			legally enforceable actions: (1) issuing a legally enforceable order, (2) issuing a legally enforceable order that imposes penalties, (3) issuing a legally enforceable order that imposes a schedule on the source to comply with the requirement(s) violated and penalties, or (4) transferring the matter to an organization with authority to initiate a civil or criminal judicial action. The addressing action can either be an enforcement action reported to ICIS as such and linked to a Case File, or there are non-enforcement options reported on the Case File as an addressing action (e.g., No Further Action, Lead Change).
	Resolving Action	Resolving Action/Date	Resolved means that: (a) in a filed judicial action (state, local or federal), a court of competent jurisdiction has entered an order adjudicating the case; (b) for violations addressed administratively or through any non-judicial means, all penalties have been collected, all SEPs completed, and the source is confirmed to be in compliance with respect to all HPVs included in the administrative order or non-judicial agreement; or (c) an enforcement agency has proposed revisions to its implementation plan regarding the violation. If the resolution was achieved via enforcement, then the date the violation was resolved is reported on the enforcement action. If resolution was achieved through non-enforcement means, the resolving action is reported on the Case File (e.g., Proposed SIP Revision).

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Activities performed by EPA personnel involve both EPA regional and headquarters staff. The regional offices generally serve as the primary liaison with respondents, and, if applicable, assume the primary role of any EPA reporting of data. Headquarters staff focus primarily on data system issues, data management practices, and other national program management activities. The EPA activities include[3]:

- Interaction with delegated agencies (e.g., answer respondent questions, train respondents on the use of the system, liaison with delegated agencies, participate in national data management discussions)
- Facilitate access to the database
- Audit and review of data submissions
- Data entry and verification
- Report preparation
- Program review (including review of user needs and suggestions of software revisions, or identification for delegated agencies of best/efficient data management and quality assurance practices)
- Data interpretation and analysis (including targeting activities)
- Quality assurance guidance

5(b) Collection Methodology and Management

(i) Overview

Management of the compliance and enforcement information collected from delegated agency respondents for entry into a national data system is a well-established process. Reporting source information, violation determinations, and compliance and enforcement activity data to ICIS-Air and its predecessors, AFS and the Compliance Data System (CDS), has existed for the past 39 years. The MDRs have been developed as essential components of a compliance and enforcement tracking program and have been adopted into delegated agency data systems. Many delegated agencies will electronically update ICIS-Air from their database, while the remaining agencies will enter data into ICIS-Air directly. In some instances, for example if permits are issued directly by EPA, it is EPA's policy that Regional Offices will enter compliance and enforcement data commensurate with what is expected from states and locals.

The EPA data collection guidance and technical support for respondents focuses on supporting agencies in their collection methodology to minimize the total burden associated with

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3 For purposes of estimating burdens, the first five items are considered the primary Regional Office activities and the last three items are considered the primary Headquarters activities.

meeting their reporting requirements. The Agency also has developed documents and memoranda to explain the collection and reporting of MDRs, such as user manuals, training materials, guidance documents, and a business rule compendium. In addition to continuing to improve these documents, EPA will continue to provide services in support of optimizing the collection and reporting of MDRs, including the following:

- An ICIS-Air telephone help line providing users with data collection transmittal and quality assurance.

- User training, to support the training of ICIS-Air users on an ongoing basis.

- Support for development and use of plug-in technologies that greatly simplify the electronic transfer of data from delegated agency databases to ICIS-Air.

- Periodic webinars to disseminate news and information to all registered users.

The EPA presents these tools in plain English to provide novice and experienced personnel with suggestions as to how their reporting burden can be minimized. More specific guidance is provided as each EPA Regional Office enters into specific agreements with delegated agencies on CAA stationary source compliance and enforcement information reporting.

(ii) Data Quality Checking Procedures

ICIS-Air data that are directly entered via the web interface are edited and validated by the system upon submission for range, context, and appropriate database record identification and cross referencing. Analogous data quality checks are made within the EPA Central Data Exchange (CDX) when delegated agencies transfer data electronically to ICIS-Air. On a weekly basis, the EPA downloads data from ICIS-Air and loads it into multiple applications providing data to the public: the ECHO system and ENVIROFACTS. These systems maintain procedures for error resolution and correction; thereby, improving the quality of data in ICIS-Air. The Integrated Error Correction Process (IECP), which includes online error flagging for review by the data owner, is a key component to EPA's compliance with the Information Quality Act. Delegated state agencies are required to have a data steward named to handle errors that are submitted by the public via the IECP. It is EPA's expectation that required data fields for facility information, activities performed, and findings identified by EPA or delegated agencies are accurate and complete to a 95% standard. EPA uses data from ICIS-Air to perform State Review Framework audits, so accurate information is necessary to correctly measure program performance. At the request of state associations, EPA runs an annual Data Verification Process that affords the states with a final opportunity to review aggregated data that will be used for SRF performance measurement. The Data Verification Process provides the states with a last check of the data to be sure there are no problems. ECHO and ECHO Gov additionally provide dashboards that allow more real-time review of state-level aggregated data that can be used at any time to review data quality/completeness, including the CAA Data Quality Dashboard to

view ICIS Air data. State and local governments can leverage those tools to assess potential areas for improving data accuracy and completeness.

Specific data from ICIS-Air will be provided to the EPA Web site, Enforcement and Compliance History Online (ECHO) (http://echo.epa.gov/), which allows the public to access compliance and enforcement information for multiple statutory programs for more than one million regulated facilities nationwide. ECHO is updated via weekly data extracts from ICIS-Air. ECHO allows the public to retrieve information about CAA regulated sources as well as EPA and delegated agency compliance evaluations, violation determinations, and enforcement actions. In addition to ECHO, data from ICIS-Air is included in the EPA's ENVIROFACTS, a web tool developed and maintained by the EPA Office of Environmental Information (http://www3.epa.gov/enviro/) that allows the public to retrieve data from a multitude of EPA databases. ICIS-Air data also will be used as part of performance measures satisfying the Government Performance Results Act requirements.

Many delegated agencies have written Standard Operating Procedures or have expanded Quality Assurance Project Plans that define their reporting process. These procedures contain a data correction mechanism, define data ownership, and outline each step taken to report timely, accurate, and useable data to the EPA. Additionally, the OECA Office of Compliance has a Quality Management Plan requiring that data quality requirements be built into each information system managed by the Office.

The EPA reviews a comprehensive set of data retrievals on a cyclic basis to review delegated agency progress within the CMS, review implementation of CAA FRV and HPV policies, examine milestone completion with HPV pathways, and enable overall review of data elements for accuracy.

The OECA State Review Framework (SRF) uses MDR data to document activity for air compliance and enforcement oversight on a periodic basis. Delegated agencies have an opportunity during an annual data verification process to validate the data, make corrections as appropriate, or develop processes to address identified program concerns.

(iii) Machine and Processing Technology

ICIS-Air resides on EPA's Enterprise Servers at the National Computer Center (NCC) in North Carolina and is accessible to all delegated agency users via the internet.

(iv) Data Entry and Storage

Once compliance data are submitted to EPA, either directly online or via an electronic data transfer process by delegated agency data stewards, the data are managed and maintained by EPA. If either EPA staff or a delegated agency data steward identifies any concerns with the data or the system, EPA staff and the data steward discuss and resolve the concern. EPA policy specifies the security and retention requirements for its databases, in addition to the specific

program requirements and archiving protocols associated with each compliance data collection program. Users of ICIS-Air should maintain reportable MDR data in the system for at least five (5) years with the exception of data pertaining to HPVs. Sources with HPVs are to be kept in ICIS-Air regardless of operating status.

(v) Public Access

The public may access CAA stationary source compliance and enforcement information through:

- Review of ICIS-Air data available through EPA-supported Web sites such as ECHO (echo.epa.gov; or https://echo.epa.gov/facilities/facility-search? mediaSelected=caa; or https://echo.epa.gov/trends/comparative-maps-dashboards/state-air-dashboard) and ENVIROFACTS.
- ECHO Clean Air Tracking Tool (ECATT)
- Freedom of Information Act requests made to EPA

5(c) Small Entity Flexibility

The respondents for this information collection activity are state, local, tribal, and territorial delegated agencies. The Regulatory Flexibility Act (RFA), incorporated in the 1995 Paperwork Reduction Act, defines a "small governmental jurisdiction as governments of cities, counties, towns, townships, villages, school districts, or special districts with a population of less than 50,000." The delegated agencies covered by this renewal ICR are above that threshold, and therefore no small entities will be affected by this information collection. The respondents defined as local agencies are recipients of Clean Air Act Section 105 grants or have assumed reporting responsibility from their respective state agency.

5(d) Collection Schedule

Data from delegated agencies is collected on a 60-day schedule (except for stack test dates and results), associated with the Federal fiscal calendar. EPA Regional and HQ data is to be reported to ICIS-Air on a monthly basis. Data is extracted weekly and provided to EPA systems for use in analysis and to provide data to the public. On a routine basis, Regional and Headquarters EPA program staff develop trend and status reports utilizing ICIS-Air data and assess the completeness of the data submitted.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

A previous ICR renewal (EPA ICR Number 0107.11) included a combined burden estimate based on the transition from reporting from the Air Facility System (AFS) to ICIS-Air, and the burden associated with reporting minimum data requirements to ICIS-Air. The data collected and the burden estimates in subsequent renewal (EPA ICR Number 0107.12) reflected the full implementation of ICIS-Air and only included the burden associated with reporting

MDRs to ICIS-Air. Therefore, a decrease in burden was estimated for EPA ICR Number 0107.12 as compared to 0107.11. The EPA has conducted multiple consultations to develop a more robust burden assessment for this ICR renewal. However, the assessment in this ICR is limited because the EPA is able to consult with less than 10% of delegated agencies. For this ICR renewal, EPA interviewed nine delegated agencies, including two agencies that use the EDT process, and three agencies that use direct online entry, and three that use a hybrid approach with both EDT and direct online entry. The consultations were conducted in September – October 2022 to identify agencies of separate size classifications (e.g., "small" agencies that report 150 or fewer major sources, and "large" agencies that report more than 150 major sources) to account for differences in the amount of data required to be reported. The burden estimates provided by the consulted delegated agencies were used to extrapolate burden for the remaining respondents.

6(a) Estimating Respondent Burden

To estimate burden for the submittal of data to ICIS-Air, EPA initiated consultations with nine delegated agencies. The average respondent hours for reporting activities will depend on the number of sources for which a delegated agency must collect and report source information, and compliance and enforcement data. The EPA identified agencies of separate size classifications (four "small" and five "large" agencies) to account for differences in the volume of minimum data requirements that would be reported by each agency. The EPA solicited and received information regarding the type of submittal and burden associated with reporting to ICIS-Air from each of the nine agencies. These agencies were asked to estimate the burden required to review, gather, quality assure (QA), and enter or upload the minimum data requirements to ICIS-Air. Agencies conducting direct entry were also asked to estimate the burden associated with individual minimum data requirements (see Appendix II). Of these, two agencies submitted data using EDT, three agencies submitted data using direct entry, and three agencies submitted data using a hybrid approach with both EDT and direct data entry. EPA also requested that agencies provide burden associated with additional activities such as trainings or participation in regional ICIS-Air guidance calls. The responses, as provided by each agency, were as follows:

➢ Three small agencies reported to ICIS-Air using direct online entry. One of these agencies estimated the total annual burden for review, gathering, QA, and submittal of data at approximately 31 hours per year. Another agency estimated the total burden for gathering, review, QA, and submittal at 224 hours per year. The third small agency using direct entry estimated the annual burden at approximately 104 hours per year.
➢ One small agency indicated they use a hybrid approach and report to ICIS-Air using EDT, with minimal usage of the direct data entry for certain data. The agency estimated the overall total burden for gathering, review, and QA of data at approximately 7 hours per year. Out of this total, approximately 6 hours per year are used for direct data entry and 1 hour is related to reviewing and correcting EDT errors.
➢ Three large agencies indicated they use a hybrid approach and report to ICIS-Air using EDT, with direct data entry for certain data elements. One agency reports compliance data using EDT and enforcement data using direct data entry with an overall total

burden for gathering, review, QA, and submittal of data at approximately 920 hours, which includes 24 hours per month to troubleshoot EDT issues. Another agency reports to ICIS-Air using EDT, except when direct data entry is needed when the EDT process is not working correctly. The overall total burden estimated by this agency for gathering, review, QA, and submittal of data is approximately 384 hours per year, which also includes time to train personnel, attend quarterly calls with the Region, and annual data verification. The third agency uses EDT to report some compliance data elements with direct data entry for other compliance data elements, but is experiencing significant challenges with their EDT system, which increase the reporting burden. This agency uses direct data entry for enforcement data. The overall total burden estimated by this agency for gathering, review, QA, and submittal of data is approximately 1,209 hours per year. Ultimately, the burden estimate provided by the third agency was determined to be an outlier based on the number of major sources they are reporting compared to other agencies we consulted.

➢ Two large agencies reported to ICIS-Air using EDT. One agency performing weekly uploads through EDT estimated the overall total burden for gathering, review, QA, and upload of data at approximately 168 hours per year. The second agency estimated an overall total of approximately 221 hours per year for gathering, review, QA, and upload of data through EDT.

➢ Out of the six agencies reporting to ICIS-Air using direct entry or a hybrid approach with some direct data entry, two agencies indicated the estimates for the time associated with reporting individual MDRs (see Appendix II) in the prior renewal were generally accurate. The other four agencies indicated the estimates for the time associated with reporting individual MDRs (see Appendix II) in the prior renewal were underestimated for some data elements. Several noted that more time is needed for entering enforcement actions and data related to high priority violations (HPV). At this time, EPA is not making changes to the time estimates as shown in Appendix II; however, the increased burden is reflected in the revised average burden per response as presented below.

We note that one large agency reported a significantly larger annual burden estimate relative to the number of major sources reported in comparison to agencies of a similar size. In order to use a representative sample to the extent possible, this agency's annual burden estimates were excluded from the average burden per response estimated below. Based on the estimates EPA received from the remaining eight delegated agencies, EPA developed a separate average burden per response for small and large agencies. The estimates were developed from the data as provided, assuming six responses annually (based on the 60-day collection schedule) and were weighted based on the number of major sources reported by each agency. This burden is similar to the burden estimates from the prior ICR Number 0107.12. The average burden per response is applied to the total number of small and large agencies to develop total annual burden estimates. Based on the data provided, the average burden per response is as follows:

- Small agencies (reporting data for 150 or fewer sources): 27 hours per response.
- Large agencies (reporting data for more than 150 sources): 84 hours per response.

There are a total of 87 small agencies and 30 large agencies. Assuming six responses per year, the total annual average burden for respondents over the next three years is estimated to be 33,400 hours per year.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$70.56 (GS-13, Step 5, $44.10 + 60%)
Technical	$52.37 (GS-12, Step 1, $32.73 + 60%)
Clerical	$28.34 (GS-6, Step 3, $17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

(ii) Estimating Capital and Operations and Maintenance Costs

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital and maintenance costs associated with this reporting activity. Delegated agencies maintain computers for their own tracking needs and this reporting activity only involves reformatting and transmission of that data.

6(c) Estimating Agency Burden and Costs

Section 5(a) identifies several Agency activities for this information collection.

The average annual Agency burden during the three years of the ICR is estimated to be 36,000. Hours are allocated for database management on the basis of 1.5 full-time equivalent positions dedicated to ICIS-Air activities in each Regional Office and 2 full time equivalents at the Headquarters level. The estimates are based on information from Regional Offices and on prior experience with the program. Estimates are formulated on a monthly basis versus bi-monthly basis (every 60 days) required of delegated agencies.

The average annual Agency costs during the three years of the ICR is estimated to be $1,910,000.

This cost is based on the average hourly labor rate as follows:

Managerial	$70.56 (GS-13, Step 5, $44.10 + 60%)
Technical	$52.37 (GS-12, Step 1, $32.73 + 60%)
Clerical	$28.34 (GS-6, Step 3, $17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Worksheet 2: Federal Annual Agency Burden and Costs - Air Stationary Source Compliance and Enforcement Information Reporting (Renewal).

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

On average over the next three years, the total number of respondents is 117 (50 states, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, the Mariana Protectorate, and 62 local or tribal air pollution control agencies). EPA has classified small and large agencies based upon the number of major sources included in their federally-reportable universe: 150 or fewer major sources is defined as a small agency, 151 or more major sources is defined as a large agency. In addition to major sources of which there are 14,344 active as of the drafting of this ICR, these delegated agencies track a significant number of non-major sources that are federally reportable (including 27,060 synthetic minors). Details regarding the delegated agency classifications is included in Appendix 1.

The number of responses is calculated for each delegated agency classification based on the assumption of six responses per agency per year. The number of Total Annual Responses is 702.

The total annual labor costs are $1,770,000. Details regarding these estimates may be found in Worksheet 1 – Annual Delegated Agency Respondent Burden and Costs – Air Stationary Source Compliance and Enforcement Information Reporting (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Worksheets 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 33,400. Details regarding these estimates may be found in section 6(a) and Worksheet 1: Annual Delegated Agency Respondent Burden and Cost – Air Stationary Source Compliance and Enforcement Information Reporting (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual reporting and recordkeeping burden for this collection of

information is estimated to average 48 hours per response.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 36,000 labor hours at a cost of $1,910,000. See Worksheet 2: Federal Annual Agency Burden and Cost – Air Stationary Source Compliance and Enforcement Information Reporting (Renewal).

Hours are allocated for database management on the basis of 1.5 full-time equivalent positions dedicated to ICIS-Air activities in each Regional Office and 2 full time equivalents at the Headquarters level.

6(f) Reasons for Change in Burden

Under a previous renewal ICR (2015; EPA ICR No. 0107.11, OMB Control No. 2060-0096), total annual delegated agency respondent burden was 51,400 hours. This renewal included burden for the use of ICIS-Air as well as the transition from the AFS to the ICIS-Air system. Additionally, this renewal relied on a time-study and limited consultations for burden.

In the most recent prior renewal (2018; EPA ICR No. 0107.12, OMB Control No. 2060-0096), the total estimated annual respondent burden was 26,100 hours. The previous decrease in burden was not due to a change in the number of respondents or the number of responses. The previous decrease in burden accounted for the fact that agencies had already transitioned from the AFS system to the ICIS-Air system and the remaining burden was only due to the ongoing reporting requirements. Additionally, many agencies switched to a more efficient reporting submission method that was not previously possible with the AFS system. However, as described in the Terms of Clearance for ICR Number 0107.12, OMB did not accept the adjusted burden for ICR Number 0107.12 and set it to 51,413 hours per year. The agency has determined through consultations with delegated agencies for both ICR Numbers 0107.12 and 0107.14 that this is an overestimate due to the fact that agencies are no longer incurring burden to transition from AFS to the ICIS-Air system and because many agencies now use a more efficient EDT submission method.

There is an increase in the estimated burden for this ICR Renewal (33,400 hours) compared to the agency's previous estimate (26,100 hours). However, this is still a decrease from the OMB approved burden estimate of 51,413 hours. The decrease from the burden estimate most recently approved by OMB is due to the fact that respondents are no longer transitioning from the AFS system to the ICIS-Air system, and the previous estimate of 51,413 included burden for the transition. Additionally, some agencies are now able to use a more efficient EDT submission method, which also reduces the annual burden. The slight increase in burden for this ICR renewal (33,400 hours) compared to the agency's previous estimate (26,100 hours) is due to an increase in the number of respondents, a correction to the estimated average hours per response based on consultations conducted with respondents in 2022, and the use of

updated labor rates. This ICR uses the most recent labor rates from the Office of Personnel Management (OPM), 2022 General Schedule.

6(g) Burden Statement

The annual average burden per response for this collection of information is estimated to be 48 hours, though this estimate varies according to the type of respondent. Reporting by delegated agencies on source compliance and enforcement actions is estimated based on the number of major sources. It is estimated that agencies will collectively spend a total of 33,400 hours per year for the transmittal, management and quality assurance of their data. The EPA will require a total of 36,000 hours per year for EPA oversight, data quality assurance, reporting, and other Agency activities.

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; 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 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, the EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OECA-2018-0248. An electronic version of the public docket is available at *http://www.regulations.gov/* which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Docket Center is (202) 566-1744. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2018-0248 and OMB Control Number 2060-0096 in any correspondence.

WORKSHEET 1

Annual Delegated Agency Respondent Burden and Cost – Air Stationary Source Compliance and Enforcement Information Reporting (Renewal)

Respondent Activities: Process, compile and review information; transmit information to ICIS-Air.	Number of Enforcement Agencies Responding per Year	Annual Responses (6x per year)	Annual Hours per Respondent	Technical Hours	Management Hours	Clerical Hours	Annual Cost
Small Delegated Agencies (150 or fewer major sources)	87	522	161	13,974	1,397	699	$850,242.20
Large Delegated agencies (151 or more major sources)	30	180	501	15,037	1,504	752	$914,914.83
Total	**117**	**702**	**662**	**29,012**	**2,901**	**1,451**	**$1,765,157.04**
Total (rounded)					**33,400**		**$1,770,000**

This ICR uses the following average hourly labor rates: For managerial $70.56 (GS-13, Step 5, $44.10 + 60%), $52.37 (GS-12, Step 1, $32.73 + 60%) for technical, and $28.34 (GS-6, Step 3, $17.71 x 60%) for clerical. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

WORKSHEET 2

Federal Annual Agency Burden and Costs - Air Stationary Source Compliance and Enforcement Information Reporting (Renewal)

EPA REGION	# OF RESPONSES	HOURS PER RESPONSE	Technical Hours	Management Hours	Clerical Hours	Annual Cost
REGION 1	12	260	2652	312	156	$165,321
REGION 2	12	260	2652	312	156	$165,321
REGION 3	12	260	2652	312	156	$165,321
REGION 4	12	260	2652	312	156	$165,321
REGION 5	12	260	2652	312	156	$165,321
REGION 6	12	260	2652	312	156	$165,321
REGION 7	12	260	2652	312	156	$165,321
REGION 8	12	260	2652	312	156	$165,321
REGION 9	12	260	2652	312	156	$165,321
REGION 10	12	260	2652	312	156	$165,321
Subtotal	**120**	**2,600**	**31,200**			**$1,653,210**
EPA HEADQUARTERS						
SYSTEM ADMINISTRATOR	12	173.33	2080	208	104	$126,553
SECURITY MANAGER	12	173.33	2080	208	104	$126,553
Subtotal	**24**	**346.66**	**4,784**			**$253,107**
Total Federal Burden (rounded)	**144**	**2,946.66**	**36,000**			**$1,910,000**

This ICR uses the following average hourly labor rates: For managerial $70.56 (GS-13, Step 5, $44.10 + 60%), $52.37 (GS-12, Step 1, $32.73 + 60%) for technical, and $28.34 (GS-6, Step 3, $17.71 x 60%) for clerical. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

APPENDIX I
DELEGATED AGENCY CLASSIFICATION BY SIZE
117 AGENCIES

	Major Sources	Synthetic Minor Sources		Major Sources	Synthetic Minor Sources
Small Agencies (150 or fewer)					
Southern Ute Tribe	0	0	San Luis Obispo County Air Pollution Control District (Non-Grantee) (SLO)	6	11
Glenn County Air Pollution Control District (Non-Grantee) (GCA)	1	0	Buncombe County (BUN)	7	10
Modoc County Air Pollution Control District (Non-Grantee) (MOD)	1	0	Spokane Regional Clean Air Agency (SPC)	7	18
Siskiyou County Air Pollution Control District (Non-Grantee) (SIS)	1	0	City Of Albuquerque (COA)	7	25
Mendocino County Air Quality Management District (Non-Grantee) (MEN)	1	1	Forsyth County (FCO)	8	21
Tehama County Air Pollution Control District (Non-Grantee) (TCA)	1	1	Nashville-Davidson County (NDC)	8	92
Amador County Air Pollution Control District (Non-Grantee) (ACD)	1	2	Vermont	8	160
Tuolumne County Air Pollution Control District (Non-Grantee) (TUC)	2	0	Virgin Islands	10	3
Butte County Air Pollution Control District (Non-Grantee) (BTT)	2	0	Mecklenburg County (MEC)	10	59
Benton Clean Air Authority (BCA)	2	4	Olympic Region Clean Air Agency (ORC)	11	9
Washoe County District Health Department (Grantee) (WCD)	2	4	Huntsville (HUN)	11	16
Great Basin Unified Air Pollution Control District (Non-Grantee) (GBU)	3	0	Imperial County Air Pollution Control District (Non-Grantee) (IMP)	12	6
Lassen County Air Pollution Control District (Non-Grantee) (LAS)	3	0	Chattanooga-Hamilton County (CHC)	12	66

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	Major Sources	Synthetic Minor Sources		Major Sources	Synthetic Minor Sources
Northern Sierra Air Quality Management District (Non-Grantee) (NSI)	3	0	Shasta County Air Quality Management District (Non-Grantee) (SHA)	13	4
Yakima Regional Clean Air Authority (YRC)	4	1	Lincoln - Lancaster County (LLC)	13	24
Northern Mariana Islands	4	2	City Of Omaha (COO)	13	33
California	4	2	Yolo Solano Air Quality Management District (Non-Grantee) (YSA)	14	0
Colusa County Air Pollution Control District (Non-Grantee) (CUS)	5	0	Pima County Air Pollution Control District (Grantee) (PMC)	14	4
Antelope Valley Air Quality Management District (Non-Grantee) (AVA)	5	1	Sacramento Metropolitan Air Quality Management District (Grantee) (SAC)	14	5
North Coast Unified Air Qualty Management District (Non-Grantee) (NCU)	5	1	Northern Sonoma Air Pollution Control District (Non-Grantee) (NSO)	15	0
Placer County Air Pollution Control District (Non-Grantee) (PCA)	5	8	Linn County (LIN)	15	117
Knox County (KNX)	5	76	Pinal County Air Pollution Control District (Non-Grantee) (PNC)	16	5
Feather River Air Quality Management District (Non-Grantee) (FRA)	6	0	Lane Regional Air Pollution Authority (LRA)	16	8
Eastern Kern Air Pollution Control District (KCA)	6	1	Puerto Rico	41	17
Southwest Clean Air Authority (SWC)	16	8	District of Columbia	46	0
Northwest Clean Air Agency (NCA)	17	10	Delaware	47	71
Monterey Bay Unified Air Pollution Control District (Grantee) (MBU)	18	1	Maine	47	248
Guam	18	3	Nevada	48	45
Polk County (PLK)	19	327	Hawaii	50	18
Ventura County Air Pollution Control District (Grantee) (VCA)	22	9	Idaho	50	190
Jefferson County (AL) (JEF)	24	103	Montana	59	39

	Major Sources	Synthetic Minor Sources		Major Sources	Synthetic Minor Sources
New Hampshire	25	162	Connecticut	61	168
Philadelphia Air Management Services (PAM)	26	67	Santa Barbara County Air Pollution Control District (Grantee) (SBC)	72	54
Memphis-Shelby County (SHL)	27	91	Arizona	72	76
Allegheny County Health Department (ACH)	28	33	South Dakota	78	74
Rhode Island	28	106	Bay Area Air Quality Management District (Grantee) (BAA)	86	30
Maricopa County Air Pollution Control Agency (Grantee) (MCA)	29	37	Nebraska	88	74
Washington	30	24	Utah	95	61
San Diego County Air Pollution Control District (Grantee) (SDS)	31	8	North Dakota	95	93
Jefferson County (KY) (JFC)	31	42	Oregon	103	24
Mojave Desert Air Quality Management District (Non-Grantee) (MDA)	33	7	Massachusetts	106	917
Clark County Department Of Air Quality (Grantee) (CCH)	33	15	Maryland	109	190
Puget Sound Clean Air Agency (PSC)	35	74	Alaska	140	220
Wyoming	117	34			
Large Agencies (151 or more)					
New Mexico	162	959	San Joaquin Valley Air Pollution Control District (Grantee) (SJV)	281	127
West Virginia	174	103	Alabama	288	234
Tennessee	187	356	North Carolina	307	634
Arkansas	194	637	Florida	330	388
Virginia	223	1,360	Georgia	331	1,322
Missouri	235	163	Wisconsin	336	294
Iowa	238	1,470	New York	355	2,944
Mississippi	245	265	Michigan	361	1,071
New Jersey	245	986	Pennsylvania	421	1,045

	Major Sources	Synthetic Minor Sources		Major Sources	Synthetic Minor Sources
Minnesota	246	149	South Coast Air Quality Management District (Grantee) (SCA)	429	0
South Carolina	251	421	Illinois	512	246
Oklahoma	251	2,964	Ohio	550	817
Kansas	256	754	Indiana	572	636
Colorado	266	1,721	Louisiana	655	161
Kentucky	271	245	Texas	2,740	18

Process #	Process	Relative Degree of Use	Explanation	Steps needed to Achieve Process in ICIS-Air	Time estimates for process from prior ICR
			Appendix II: Business Processes for Reporting Stationary Source information into ICIS-Air		
			NOTE: The ICIS-air processes listed in this document, have been described in just one way. Users may navigate through ICIS-air and enter or change records via alternative routes		
1	Logon to application	Frequent use	Used each time a user logs onto ICIS	Go to //https://icisairtest.epa.gov/icis and logon using WAM User ID and password	1 minute
2	Add a facility	Moderate use	Used when a federally reportable facility is added	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then ADD A FACILITY; provide Programmatic ID, Facility Site Name, State, Zip Code, Address, City, County Name & Primary NAICS. Select SAVE AND ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.	3 minutes
				If already logged into ICIS-air, select AIR then ADD A FACILITY; provide Programmatic ID, Facility Site Name, State, Zip Code, Address, City, County Name & Primary NAICS. Select SAVE AND ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.	2 minutes
3	Add Regulated Air Program	Infrequent use	Used whenever a Regulated AIR Program is added to an existing facility	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE.	2 minutes
				If already logged into ICIS-air, select AIR then Search for Facility. Select facility from Search list. Select ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE.	1minute
4	Add a regulated Pollutant	Infrequent use	Used whenever a new pollutant is added to an air program on an existing facility	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.	3 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.	1.5 minutes
5	Add a Compliance Monitoring action	Frequent use	Used to add PCE's, FCE's, Stack Tests, TVACC & Investigations to an existing facility	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select Compliance Monitoring-Inspection/Evaluation for State. Supply information for Compliance Monitoring Identifier, Compliance Monitoring Type, Linked facilities, Actual End Date, Air Program(s). If the CM activity is a stack test, provide Stack Test Status. Scroll to bottom and select SAVE.	3 minutes

				If already logged into ICIS-air, select Compliance Monitoring-Inspection/Evaluation for State. Supply information for Compliance Monitoring Identifier, Compliance Monitoring Type, Linked facilities, Actual End Date and Air Program(s). If the CM activity is a Stack Test, provide Stack Test Status. Scroll to bottom and select SAVE.	2 minutes
6	Add an Enforcement action	Frequent use	Used to add Informal and formal enforcement actions to an existing facility	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select Enforcement Actions and choose Formal, Judicial or Informal for your agency. For a Formal Enforcement action, (1) check Administrative Order, link facility(s) and provide Air Program(s) Violated. Click SAVE; (2) Select ADD FINAL ORDER sublink. Supply Final Order Type & Issued date. Click SAVE; (3) Select PENALTY sublink, supply Assessed cash Penalty in the Penalty to be Paid to field. Click SAVE. (4) Select Milestones sublink. Provide Complaint Filed/Proposed Order Final Date. Click SAVE	4 minutes
				If already logged into ICIS-air select Enforcement Actions and choose Formal, Judicial or Informal for your agency. For a Formal Enforcement action, (1) check Administrative Order, link facility(s) and provide Air Program(s) Violated. Click SAVE; (2) Select ADD FINAL ORDER sublink. Supply Final Order Type & Issued date. Click SAVE; (3) Select PENALTY sublink, supply Assessed cash Penalty in the Penalty to be Paid to field. Click SAVE. (4) Select Milestones sublink. Provide Complaint Filed/Proposed Order Final Date. Click SAVE	3 minutes
7	Add Comments to a Facility or Action	Infrequent use	Used whenever a comment is added to either a facility or an action	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Search for and select the CM activity or Enforcement active that is receiving the comment. If the Comment is non-sensitive, scroll down to the Comment field on the activity record. Enter Comment and click SAVE. If the Comment is sensitive, select the Sensitive Comment sublink of the activity receiving the comment. Enter Comment text and click SAVE.	2 minutes
				If already logged into ICIS-air, search for and select the CM activity or Enforcement active that is receiving the comment. If the Comment is non-sensitive, scroll down to the Comment field on the activity record. Enter Comment and click SAVE. If the Comment is sensitive, select the Sensitive Comment sublink of the activity receiving the comment. Enter Comment text and click SAVE.	1 minute
8	Add a facility to CMS	Once a year or whenever CMS Plan is modified	Used whenever a facility is added to the biannual CMS Plan	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select CMS. Select ADD CMS. Enter CMS Source Category and CMS Minimum Frequency. Select SAVE.	2 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select CMS. Select ADD CMS. Enter CMS Source Category and CMS Minimum Frequency. Select SAVE.	1 minute

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9	Add HPV	Frequent use	Used whenever an HPV is added	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select Case Files. (1) Select ADD CASE FILE. Provide Case File Identifier, Link facility if needed, Air Program(s), Applicable Pollutants. Scroll to bottom and click SAVE AND ADD AIR VIOLATIONS. (2) Enter HPV/FRV details by clicking on the ADD AIR VIOLATION link on the Air HPV/FRV Details TAB. Select Violation Type, Pollutant & Program from drop down list. Enter FRV or HPV date. Select SAVE.	4 minutes
				If already logged into ICIS-air, select AIR then search for desired facility. Select facility from search list. Select Case Files. (1) Select ADD CASE FILE. Provide Case File Identifier, Link facility if needed, Air Program(s), Applicable Pollutants. Scroll to bottom and click SAVE AND ADD AIR VIOLATIONS. (2) Enter HPV/FRV details by clicking on the ADD AIR VIOLATION link on the Air HPV/FRV Details TAB. Select Violation Type, Pollutant & Program from drop down list. Enter FRV or HPV date. Select SAVE.	3 minutes
10	Add/Link Discovery action to Day Zero	Frequent use	Used whenever a Discovery action is linked to it is Day Zero	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If Discovery action has already been entered, Click Case Files. Select Case File Id from list. Click Compliance Monitoring activities. Click LIST TO LINK. Select desired CM activities to be linked to Case file. Click LINK. If Discovery action has not already been entered, first add CM activity and then link it to the Case File.	2 minutes if Discovery action already exists; 3.5 minutes if Discovery action does not exist
				If already logged into ICIS-air, select AIR then search for desired facility. If Discovery action has already been entered, Click Case Files. Select Case File Id from list. Click Compliance Monitoring activities. Click LIST TO LINK. Select desired CM activities to be linked to Case file. Click LINK. If Discovery action has not already been entered, first add CM activity and then link it to the Case File.	1 minutes if Discovery action already exists; 1.5 minutes if Discovery action does not exist
11	Add/Link NOV action to Day Zero	Frequent use	Used whenever an NOV is Added/linked to it is Day Zero	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If NOV action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Informal Enforcement activities to be linked to Case file. Click LINK. If NOV action has not already been entered, first add NOV activity and then link it to the Case File.	2 minutes if NOV action already exists; 3.5 minutes if NOV action does not exist
				If already logged into ICIS-air, select AIR then search for desired facility. If NOV action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Informal Enforcement activities to be linked to Case file. Click LINK. If NOV action has not already been entered, first add NOV activity and then link it to the Case File.	1 minutes if NOV action already exists; 1.5 minutes if NOV action does not exist
12	Add/Link Addressing action to Day Zero	Frequent use	Used whenever an Addressing is Added/linked to it is Day Zero	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If Addressing action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Enforcement activities to be linked to Case file. Click LINK. If Addressing action has not already been entered, first add addressing activity and then link it to the Case File.	2 minutes if addressing action already exists; 3.5 minutes if addressing action does not exist

				If already logged into ICIS-air, select AIR then search for desired facility. If Addressing action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Enforcement activities to be linked to Case file. Click LINK. If Addressing action has not already been entered, first add addressing activity and then link it to the Case File.	1 minute if addressing action already exists; 3.5 minutes if addressing action does not exist
13	Add/Link Resolution action to Day Zero	Frequent use	Used whenever a Resolution action is Added/linked to it is Day Zero	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. Click on the Addressing Action to edit the record and navigate to the Final Order sublink. Click the desired Final Order and an Air Resolved date on the Dates tab. Scroll to bottom of page and click SAVE.	2.5 minutes
				If logged into ICIS-air, select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. Click on the Addressing Action to edit the record and navigate to the Final Order sublink. Click the desired Final Order and an Air Resolved date on the Dates tab. Scroll to bottom of page and click SAVE.	1.5 minute
14	Add/Link Lead change action to Day Zero	Infrequent use	Used whenever a Lead changes takes place for an HPV	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. If Case has not been Addressed, point to the Addressing Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE. If Case has already been Addressed, point to the Resolving Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE.	2.5 minutes
				If already logged into ICIS-air, select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. If Case has not been Addressed, point to the Addressing Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE. If Case has already been Addressed, point to the Resolving Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE.	1.5 minutes
15	Change Plant General	Moderate use	Used when a Plant Name, Street address, City Name, Zip Code, NAICS or Governmental Facility Code changes are needed in ICIS	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Update Plant Name, Street Address and Zip Code. Select SAVE.	3 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Update Plant Name, Street Address and Zip Code. Select SAVE.	1.5 minutes
16	Change to Operating status	Moderate use	Used whenever the operating status of a regulated air	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Air Programs. Select the Air Programs Description link. Enter Operating Status in Edit Current Operating Status. Select SAVE.	3 minutes

			program changes	If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select Air Programs. Select the Air Programs Description link. Enter new Operating Status in Edit Current Operating Status. Select SAVE.	1 minute
17	Change a Compliance Monitoring action	Moderate use	Used to modify the results of a stack test or add the received date to a TVACC; also used to correct data entry errors on an action	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Compliance Monitoring. Filter to find Stack Tests. Select Compliance Monitoring ID/Activity Id from filtered list. Select new Stack Test Status. Select SAVE.	3.5 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select Compliance Monitoring. Filter to find Stack Tests. Select Compliance Monitoring ID/Activity Id from filtered list. Select new Stack Test Status. Select SAVE.	1 minute
18	Modify CMS data for a facility	Moderate use	Used to modify CMS Category (class changes)	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select CMS. Select CMS Start Date link. Change CMS Category. Select SAVE.	3 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list Select CMS. Select CMS Start Date link. Change CMS Category. Select SAVE.	1 minute
19	Delete information	Moderate use	Used to remove duplicates or data entry errors	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Compliance Monitoring. Filter to find action. Select Delete for action to be deleted on filtered list. Select YES to delete.	4 minutes
				If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list Select Compliance Monitoring. Filter to find action. Select Delete for action to be deleted on filtered list. Select YES to delete.	2 minutes