**SUPPORTING STATEMENT**

 **ENVIRONMENTAL PROTECTION AGENCY**

**Ambient Air Quality Surveillance 40 CFR 58 (Renewal)**

**1. Identification of the Information Collection**

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

Ambient Air Quality Surveillance (Renewal), EPA ICR Number 0940.30, OMB Control Number 2060-0084.

**1(b) Short Characterization/Abstract**

This Information Collection Request (ICR) includes ambient air monitoring data reporting and recordkeeping activities associated with the 40 CFR 58 Ambient Air Quality Surveillance rule. These data and information are collected by various state, local, and tribal air quality management agencies and reported to the Office of Air Quality Planning and Standards within the Office of Air and Radiation, U.S. EPA.

This ICR covers the period of 2023-2025. In addition to updating the burden estimates for the ambient monitoring activities, estimates for two new activities are being included. A new burden estimate is included associated with implementing a reporting system and reporting requirements for asset management in this ICR renewal and the U.S. EPA has solicited feedback from reporting agencies on asset management reporting as described in Section 3(c) below. Additionally, the U.S. EPA is including estimated burden associated with data collection and reporting for sensors. It is estimated that the number of reporting organizations using sensors will increase by approximately 20 reporting organizations per year over the next three years. Other than the increased use of sensors, no significant changes to the monitoring networks are expected over the next three years. Therefore, the number of respondents or monitoring stations shown in the first year of this ICR reflects what is currently operating and there are no changes expected for the second or third years. The sampling parameters and frequency of data collection and submittal is expected to remain stable from 2023 through 2025.

The data collected through this information collection consist of ambient air concentration measurements for the seven air pollutants with national ambient air quality standards (i.e., ozone, sulfur dioxide, nitrogen dioxide, lead, carbon monoxide, PM2.5 and PM10), ozone precursors, air toxics, meteorological variables at a select number of sites, and other supporting measurements. Accompanying the pollutant concentration data are quality assurance/quality control data and air monitoring network design information. This information is being collected to assure compliance with the 40 CFR 58 Ambient Air Quality Surveillance rule.

The U.S. EPA and others (e.g., state and local air quality management agencies, environmental groups, academic institutions, industrial groups) use the ambient air quality data for many purposes. Some of the more prominent uses include informing the public and other interested parties of an area’s air quality, judging an area’s (e.g., county, city, neighborhood) air quality in comparison with the established health or welfare standards (including both national and local standards), evaluating an air quality management agency’s progress in achieving or maintaining air pollutant levels below the national and local standards, developing and revising State Implementation Plans (SIPs) in accordance with 40 CFR 51, evaluating air pollutant control strategies, developing or revising national control policies, providing data for air quality model development and validation, supporting enforcement actions, documenting episodes and initiating episode controls, air quality trends assessment, and air pollution research.

The state, local, and tribal agencies with responsibility for reporting ambient air quality data and information as requested in this ICR submit these data electronically to the U.S. EPA’s Air Quality Subsystem (AQS) database. Quality assurance/quality control records and monitoring network documentation are also maintained by each state and local agency, in AQS electronic format where possible.

Although the state and local air pollution control agencies and tribes are responsible for the operation of the air monitoring networks, the EPA funds a portion of the total costs through federal grants. These grants generally require an appropriate level of contribution, or “match,” from the state/local agencies and tribes. The costs shown in this renewal are the total costs incurred for the monitoring program regardless of the source of the funding. This practice of using the total cost is consistent with prior ICR submittals and renewals.

This Information Collection is estimated to involve 168 respondents for a total cost of approximately $181,278,444 (total capital, and labor and non-labor operation and maintenance) plus a total labor burden of 1,449,968 hours. The labor costs associated with the 1,449,968 hours is $111,130,958. Included in the total are other costs of non-labor operations and maintenance of $13,700,371 and equipment and contract costs of $56,447,115. In addition to the costs at the State and local air pollution control agencies, there is a burden to EPA of 197,269 hours and $16,950,977.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

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

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

The information requirements included within this ICR are necessary to provide the U.S. EPA with ambient air quality surveillance data to determine the United States’ air quality status, to make attainment decisions with respect to the NAAQS, to assist in developing necessary control strategies to ensure attainment of the NAAQS, to assess national trends in air pollution, to inform the public of air quality, and to determine the population’s exposure to various ambient air pollutants. The U.S. EPA’s goal of attaining the NAAQS in all areas of the United States is directly dependent upon the availability of ambient air quality data requested in this information collection. Additionally, the U.S. EPA, state and local agencies, environmental groups, industrial groups, and academic organizations use these data to study atmospheric chemistry, e.g., the formation of ozone, to determine the most appropriate and effective control strategies necessary to reduce air pollution.

The principal legal authority for this information collection is the Clean Air Act 42 U.S.C.A. §§ 7403, 7410, and 7511a, from which the 40 CFR 58 Ambient Air Quality Surveillance regulation was promulgated.

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

Section 7410 (a) contains the SIP requirements, which include a requirement that each state submit a SIP that provides for the establishment and operation of appropriate devices, methods, systems, and procedures necessary to monitor, compile, analyze, and make available to the Administrator data on ambient air quality.

Section 7511a (c)(1) states that the Administrator will promulgate rules that require state and local air quality management agencies conduct enhanced monitoring of ozone and its precursors (oxides of nitrogen and volatile organic compounds) in serious, severe, or extreme ozone nonattainment areas.

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

The Office of Air Quality Planning and Standards (OAQPS) uses the ambient air quality data included within this collection to make attainment decisions with respect to the NAAQS for ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, lead, and particulate matter. For areas that do not attain the NAAQS for one or more pollutants, the OAQPS, the affected U.S. EPA Regional Office, and the affected state or local air quality management agency will work to develop an appropriate control strategy plan (SIP) to address how the area’s air quality can be improved.

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

Using the Air Quality Index (AQI) reporting system outlined within the 40 CFR 58 regulation (on which this ICR is based), state and local air quality management agencies report air quality to the public in all metropolitan areas with a population greater than 350,000. Details on the AQI system can be found at http://www.epa.gov/airnow. The AQI reporting mediums can vary depending upon the location; however, it is generally reported in newspapers, on local television news stations, through a central telephone number, and/or by radio.

The U.S. EPA, state and local air quality management agencies, the regulated community (e.g., industrial groups), environmental groups, and air pollution researchers (such as those at the Georgia Institute of Technology and the Harvard School of Public Health) use ambient air pollutant and meteorological data to study the emission of air pollutants, the formation of secondary air pollutants (e.g., ozone, fine particles), the transport of these pollutants over large distances, and the effects of various pollutants on the public’s health and welfare. The Photochemical Assessment Monitoring Station (PAMS) program, which is included within this information collection, is designed specifically to assist the U.S. EPA and these same groups with the study of ozone formation and accumulation in areas with significant ambient ozone pollution problems. This network was redesigned as part of the final Ozone NAAQS in 2015. These areas are defined within the Clean Air Act Amendments of 1990 as serious, severe, and extreme ozone NAAQS nonattainment areas.

Given the significant impact of ambient air data upon the air pollution program, it is essential that the U.S. EPA provide the means for ensuring that the ambient air quality data are of a high quality. The means for accomplishing this take on several forms, such as the requirements that state and local agencies report precision and accuracy testing results, incorporate quality assurance/quality control procedures in their daily monitoring site operation, conduct equipment and procedure audits through the National Performance Audit Program, and work with the U.S. EPA to conduct systems audits periodically. Records detailing the operation and maintenance practices for each ambient air monitoring site are necessary in order to meet the quality assurance/quality control requirements and recommendations.

Additionally, the U.S. EPA is requiring electronic reporting of ambient air quality data, associated quality assurance data, concentration data, meteorological data, and other metadata and information as specified in 40 CFR 58.16(a) via the U.S. EPA's Air Quality System (AQS). The AQS is the U.S. EPA's computerized system for storing and reporting of information relating to ambient air quality data, which can be accessed at https://www.epa.gov/aqs.

**3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 58.

**3(a) Nonduplication**

This collection is not unnecessarily duplicative of information otherwise reasonably accessible to the agency. The AQS system, which contains information based solely on this collection, is the only national air quality data repository available to the U.S. EPA. The ambient air quality surveillance data and related information collected through this information collection are not otherwise reasonably accessible to the U.S. EPA.

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

**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* (88 FR 10315) on February 17, 2023. No comments were received on the burden published in the *Federal Register* for this renewal.

**3(c) Consultations**

During the development of this ICR renewal, the U.S. EPA consulted with the National Association of Clean Air Agencies (NACAA) Monitoring Subcommittee and the Association of Air Pollution Control Agencies (AAPCA). The Agencies are comprised of various state and local air quality management agency contacts. The NACAA and AAPCA did not provide comments on this ICR renewal. Through the course of planning, monitoring, and improving upon this collection and its associated regulation, the U.S. EPA regularly consults with affected state and local air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The U.S. EPA routinely conducts workshops and training on the AQS reporting system. The U.S. EPA Regional Offices conduct annual ambient air monitoring meetings with their affected state and local air quality management agencies to assist these affected agencies with this collection and its associated regulation. The U.S. EPA’s OAQPS also meets regularly with the NACAA Monitoring Subcommittee and AAPCA to discuss the nation’s ambient air monitoring program and this collection. The discussions with these Agencies include changes to the ambient air monitoring networks, whether it be an increased requirement or the need to reduce the size of a monitoring network based on the minimum requirements included in the regulations.

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. In this case, no comments were received.

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

In most cases, state and local air quality management agencies would collect and report ambient air quality data without the 40 CFR part 58 regulation associated with this collection. Sanctions do not accrue to state or local air quality management agencies that fail to meet these requirements. The 40 CFR part 58 regulation and this associated collection do provide for a consistent system for reporting and record keeping that would not exist without these requirements. The effects of less frequent collection include:

• A national database that is not consistently updated and available for public consumption;

• Less timely attainment designations with respect to the NAAQS;

• More difficultly in identifying and repairing problems with an ambient air monitor--i.e., data are used to check a monitor’s operating condition, and reporting data less frequently would delay a state or local agency’s ability to recognize a problem with a monitor or a laboratory procedure; and

• The U.S. EPA would not be able to consistently answer questions from the public in a timely fashion regarding air quality in various areas of the country.

**3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

**3(f) Confidentiality**

Information that is considered personal, private, proprietary, or confidential is not required in this collection. One purpose of collecting ambient air data through the AQS is to inform the public of general air quality in ambient air (air considered generally accessible to the public) and, as such, does not present a need for maintaining a confidential nature.

Measures are taken to secure the AQS electronic database to prevent tampering with the database by limiting the access to the AQS mainframe. The U.S. EPA also provides a secure data input area for state and local agencies that collect ambient air data that they do not want to provide to the general public (e.g., special study data or industrial data). These data are not required to be collected under this ICR; nonetheless, this secured area is available to each state and local agency that wishes to use the AQS as a repository for these data.

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR part 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

**3(g) Sensitive Questions**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

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

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

The respondents to the recordkeeping and reporting requirements are state, local, and tribal agencies. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is SIC 951 (Administration of Environmental Quality Program) which corresponds to the North American Industry Classification System (NAICS) 9241 (Administration of Environmental Quality Programs).

**4(b) Information Requested**

**(i) Data Items**

A state, local, or tribal agency must report on these data items to submitted electronically to the U.S. EPA’s AQS as required by 40 CFR part 58:

• Hourly ambient air pollutant concentrations of ozone, sulfur dioxide, nitrogen dioxide, and carbon monoxide and some measurements of particulate matter collected by state, local agencies, and tribes.\*

• Maximum 5-minute average concentrations for each hour for sulfur dioxide.\*

• Daily (24-hour) concentration values of particulate matter and lead collected at state, local agencies and tribes.\*

• Ozone precursor and meteorological data collected at PAMS.\*

• Precision and accuracy data for all state, local agencies and tribes.

• Ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, lead, and particulate matter concentration data as collected by SPMs, if these data are to be used for regulatory purposes.\* This includes data collected by collocated samplers or concurrent monitors as appropriate.

• State and local agencies and tribal monitoring network description information, including the site AQS identification number\*, the site location\*, the sampling and analysis method\*, the operating schedule\*, the monitoring objective\*, the site’s scale of representation\*, the identity of the urban area represented\*, and the quality assurance plan.

• PAMS network description which includes an implementation schedule, the identification of the monitoring area represented\*, the AQS site identification number\*, the site location\*, the site type\*, the sampling and analysis method\*, the operating schedule\*, and an ozone event forecasting scheme if appropriate.

• Results of the annual ambient air monitoring network and quality assurance plan review.

• Annual SLAMS summary report which includes the location, date, pollution source, and duration of each incident of air pollution during which ambient levels of a pollutant reached or exceeded the significant harm levels as defined in 40 CFR § 51.151\*, the certification of the report’s accuracy by a designated state air pollution control officer, and various other summary statistics as provided by the AQS system\*.

• In metropolitan areas with a population greater than 350,000, the appropriate state or local air quality management agency must report to the public through prominent notice (e.g., newspaper, radio, local weather forecast, at a publicly accessible area) the AQI value indicating the status of the area’s air quality (i.e., good, moderate, unhealthful, very unhealthful, hazardous). This prominent notice must be made on at least 5 days per week. The AQI\* is calculated using information collected in this request.

*\*From the above list, those data marked with an asterisk are stored electronically within the U.S. EPA’s AQS, and separate records kept by the state or local air quality management agency are not needed.*

In addition to those items stored within the U.S. EPA’s AQS, state and local air quality management agencies will maintain records on the following items:

• Approved PAMS network description for areas designated as serious, severe, or extreme ozone nonattainment areas.

• Site information that is not maintained on the AQS system (e.g., site maps, pictures), and any siting waiver documentation provided by the Regional Administrator, the Administrator, or their designee.

• The network quality assurance plan for the measurement of ozone, nitrogen dioxide, sulfur dioxide, lead, carbon monoxide, and particulate matter. This includes operational procedures for the entire network, e.g., the selection of methods; training; equipment installation; selection and control of calibration standards; calibration; zero/span checks and adjustments of automated analyzers; control checks and their frequency; control limits for zero, span and other control checks, and respective corrective actions when such limits are surpassed; calibration and zero/span checks for multiple range analyzers; preventive and remedial maintenance; quality control procedures for air pollution episode monitoring; recording and validating data; data quality assessment (precision and accuracy); and quality control documentation.

Electronic Reporting

The U.S. EPA is requiring electronic reporting of ambient air quality data, associated quality assurance data, concentration data, meteorological data, and other metadata and information as specified in 40 CFR 58.16(a) via the U.S. EPA's Air Quality System (AQS). The AQS is the U.S. EPA's computerized system for storing and reporting of information relating to ambient air quality data, which can be accessed at https://www.epa.gov/aqs. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit data electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements.

**(ii) Respondent Activities**

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

• Read the 40 CFR 58 regulatory provisions and other U.S. EPA guidance (for example, please reference our Internet site at https://www.epa.gov/amtic).

• Plan ambient air monitoring activities, such as developing a quality assurance plan for the network operation and maintenance, developing and reviewing the ambient air quality surveillance network design, planning where to locate sites, plan how to maintain and operate each site, develop a data reporting and validation plan.

 • Write the quality assurance plan for network operation and maintenance, the ambient air quality surveillance network plan, and the data reporting and validation plan. Submit these plans to the U.S. EPA Regional or Headquarters office for review, and approval if appropriate.

• Obtain on-site leases or agreements to locate ambient air quality surveillance equipment.

• Investigate vendors and procure equipment necessary to meet the ambient air quality network plan.

• Receive training for site operation and maintenance, quality assurance procedures, and data processing and reporting.

• Make arrangements for appropriate utility hookups for each ambient air quality surveillance site, i.e., electricity, telephones, data lines for electronic submission of concentrations from automated analyzers.

• Install ambient air quality surveillance equipment and equipment shelter. Ensure security of the site.

• Conduct ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.

• For particulate matter and lead, conduct necessary filter collection and analyses to obtain concentration data.

• Report ambient air pollutant concentration data electronically if from an automated analyzer (generally, this includes ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide measurements), and from a central location, such as a laboratory, if for particulate matter, ozone precursors, or lead samplers.

• Validate the ambient air data for quality assurance considerations.

• Electronically submit the complete and validated ambient air data to the AQS data repository.

• Provide the U.S. EPA with the SLAMS summary report annually.

Each of these activities are conducted using existing reporting and recordkeeping practices, including electronic submittal to the AQS. If the 40 CFR part 58 regulation did not exist, and presumably the related AQS, quality assurance procedures, and siting guidance did not exist, the state and local air quality management agencies would in a majority of cases conduct monitoring; however, methods used by each agency would vary and data would not be readily available to EPA and the public. The influence of the 40 CFR part 58 regulation has been to provide a nationally consistent mechanism for collecting ambient air quality data including uniform quality assurance procedures, data collection and storage mediums (AQS), and uniform methodology. Without this regulation and associated ICR, managing and maintaining a national air quality program would be extremely difficult, if possible.

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

**5(a) Agency Activities**

The U.S. EPA conducts the following activities to implement this ICR and associated regulation:

• Periodically review the 40 CFR part 58 regulation to update the information collection and monitoring requirements in light of new technological developments or new air pollutant standards. Develop revisions to the regulation in response to legislative action and program changes.

• Establish, maintain, and support the AQS as the national repository for all state and local air quality management agency ambient air quality data and monitoring information and tribal data. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.

• Answer respondent (generally state and local air quality management agencies, but also industrial organizations, environmental groups, and others) questions about ambient air monitoring, the 40 CFR part 58 regulatory requirements, and the AQS. This includes the establishment of the Ambient Monitoring Technology Information Center website, the AQS toll-free hotline, and other written or verbal communication.

• Support the quality assurance program by working within the U.S. EPA and with the respondents to evaluate precision and accuracy data, oversee the National Performance Audit Program, participate in systems audits, and conduct weekly data validation checks on the AQS data submittal.

• Provide within the AQS mechanisms for statistical calculations, such as the number of times a particular ambient air quality monitoring site exceeds the NAAQS. Distribute the AQS data in various ways including upon written request, by Freedom of Information Act request, by press release, and in the annual National Air Quality and Emissions Trends Report.

• Provide adequate electronic storage space within the AQS for all ambient air quality surveillance data and information.

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

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

The EPA has provided and will continue to provide resources for the maintenance and operation of the AQS national data repository. All data required by this collection are submitted electronically to reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. Various statistical and graphical summaries are also provided by the AQS and AIRS Graphics systems which enhance the utility of the information for consumption by the public and all affected state and local air quality management agencies. In submitting ambient air data into the AQS national repository, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State and local air quality management agencies and the EPA have been submitting data to the AQS since its inception in 1987.

**5(c) Small Entity Flexibility**

This collection contains a minimum amount of information in order to manage the air quality program for the United States. The smallest entities affected by this collection are local air quality management agencies, typically consisting of the governing agencies for a county or group of counties, or a smaller metropolitan area (e.g., cities with a population of 100,000). This collection reduces, to the extent practicable and appropriate, the burden on entities that provide ambient air quality data and information to or for the U.S. EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

(1) establishing differing compliance or reporting requirements or timetables that take into account the resources available to those who are to respond (e.g., the monitoring and reporting requirements decrease as the population of an area decreases, and various timetables for deploying ambient air monitoring stations are negotiated between the affected state or local air quality management agency and the U.S. EPA with consideration of the respondent’s resources);

(2) the clarification, consolidation, or simplification of compliance and reporting requirements (e.g., by establishing, maintaining, and improving as needed the AQS national repository for ambient air quality data and information);

(3) an exemption from coverage of the collection of information, or any part thereof (e.g., the U.S. EPA negotiates with state and local air quality management agencies to determine the most effective and most efficient ambient air quality networks with respect to the monitoring needs, technical abilities, and resources available to each affected agency).

**5(d) Collection Schedule**

Ambient air quality surveillance data and precision and accuracy data for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, and particulate matter are submitted according to the schedule defined in 40 CFR 58.16. This current regulation requires that state and local air quality management agencies report their data within 90 days after the end of the quarter during which the data were collected.

The annual SLAMS report is submitted by May 1 of each year for data collected from January 1 through December 31 of the previous year in accordance with 40 CFR 58.15. This certification also requires that all SPM monitoring data to be used for regulatory purposes by the affected state or local air quality management agency have been certified by May 1 of each year.

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

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

• Upon request to the appropriate U.S. EPA Regional office, or to the OAQPS;

• By Freedom of Information Act Request to the appropriate U.S. EPA Regional Office or the OAQPS;

• From the state or local air quality management agency responsible for collecting the ambient air quality data and information;

• By obtaining access, through appropriate U.S. EPA channels, to the AQS to obtain the data electronically;

• Through U.S. EPA public reports, such as the annual “National Air Quality and Emissions Trends Report”; or

• Through the AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see www.epa.gov/airnow).

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

Table 1 at the end of this document and the supplemental cost file document the computation of individual burdens for the recordkeeping and reporting requirements applicable to reporting organizations for 40 CFR part 58. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The ICR burden estimates contained within this renewal are based upon program estimates with the addition of inflationary increases.

The 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.

**6(a) Estimating Respondent Burden**

The average annual burden to respondents over the next three years from these recordkeeping and reporting requirements is estimated to be 1,453,018 hours (Total Labor Hours from Table 1). The detailed burden hour estimates for this ICR renewal are based on estimates provided in the Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants (EPA-454-R-93-042). We conferred with affected state and local agencies to examine the burden estimates and to compare these values with hourly burdens experienced by their agencies. These agencies are representative of those affected state and local agencies that respond to this collection.

**6(b) Estimating Respondent Costs**

**(i) Estimating Labor Costs**

Table 1 at the end of this document and the supplemental cost file document the computation of labor costs for the recordkeeping and reporting requirements applicable to reporting organizations for 40 CFR part 58. The detailed burden and cost estimates are based on information provided in the Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants (EPA-454-R-93-042). All costs from this document were inflated to 2023, 2024, or 2025 by using the Consumer Price Index (CPI) values, which are available at https://www.minneapolisfed.org/about-us/monetary-policy/inflation-calculator/consumer-price-index-1913-. A summary of the average annual respondent burden costs is shown in Table 1 at the end of this document.

**(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of costs associated with the information collection activities in this ICR renewal are both labor costs which are addressed elsewhere in this ICR and the costs associated with monitoring equipment. The capital/startup costs are one-time costs. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

**(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

Table 1 at the end of this document and the supplemental cost file document the computation of capital/startup and operation and O&M costs applicable to reporting organizations for 40 CFR part 58. The total capital/startup costs for this ICR are $56,447,115. The total operation and maintenance (O&M) costs for this ICR are $13,700,371.

The average annual total for capital/startup and operation and maintenance costs to respondents over the next three years of the ICR is estimated to be $70,147,486.

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

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $16,950,977.

We estimated the Agency burden and cost using current burden and cost of the ambient air monitoring program related to this collection. We included burden and cost for the OAQPS, the ten Regional Offices, and associated contract activities. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used an average salary for computing the program costs. Labor rates are from the Office of Personnel Management (OPM), 2023 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. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total of 197,269 hours and $16,950,977 total agency burden. Details upon which this estimate is based appear at the end of this document in Table 2.

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

Based on our research for this ICR, on average over the next three years, approximately 168 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 168 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

| **Number of Respondents** |
| --- |
|  | Respondents That Submit Reports | Respondents That Do Not Submit Any Reports |  |
| Year | (A)Number of New Respondents | (B)Number of Existing Respondents | (C)Number of Existing Respondents that keep records but do not submit reports | (D)Number of Existing Respondents That Are Also New Respondents | (E)Number of Respondents(E=A+B+C-D) |
| 1 | 0 | 168 | 0 | 0 | 168 |
| 2 | 0 | 168 | 0 | 0 | 168 |
| 3 | 0 | 168 | 0 | 0 | 168 |
| Average | 0 | 168 | 0 | 0 | 168 |

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 168.

**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 Tables 1 and 2 at the end of this document, respectively, and summarized below.

**(i) Respondent Tally**

The total annual labor hours are 1,449,968. Details regarding these estimates may be found in Table 1: Grand Total Average 2023-2025 Renewal for Labor Hours & Costs.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,158 hours per response.

The total annual capital/startup costs to the regulated entity are $56,447,115 and O&M costs to the regulated entity are $13,700,371. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

**(ii) The Agency Tally**

The average annual Agency burden and cost over the next three years is estimated to be 197,269 labor hours at a cost of $16,950,977. See Table 2: Total EPA Burdens And Costs for CY-2023-2025.

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

The currently approved ICR estimate of burden hours is 1,771,662. This ICR renewal burden hour estimate updates the previous submittal. There is a decrease of 321,694 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. The decrease in burden, labor costs, and capital/O&M costs from the most recently approved ICR is due to an adjustment(s). There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease reflects the consolidation of monitors into fewer sites, consolidation of PAMS network burden estimates to avoid double counting, termination of unnecessary monitors, and more efficient automated procedures (e.g., moving from manual samplers to automated continuous samplers) for measuring and reporting data. The decrease is offset somewhat by the additional burden and cost estimates included for asset management and sensors.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,158 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2002-0091,which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2002-0091 and OMB Control Number 2060-0084 in any correspondence.

**Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Grand Total Average 2023-2025 Renewal for Labor Hours & Costs**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Cost Element** | **Labor Hours** | **Labor Costs** | **Non-labor O & M** | **Equipment Contract** | **Total Cost** |
| 1. Network Design | 59,321 | $2,556,442 | $0 | $5,262,331 | $7,818,773 |
| 2. Site Installation | 14,270 | $1,266,843 | $0 | $42,367,662 | $43,634,505 |
| 3. Sampling & Analysis | 289,930 | $32,858,480 | $9,343,891 | $8,163,902 | $50,366,272 |
| 4. Maintenance | 196,526 | $13,895,671 | $4,132,094 | $0 | $18,027,765 |
| 5. Data Management | 450,641 | $29,167,886 | $0 | $0 | $29,167,886 |
| 6. Quality Assurance | 254,802 | $18,377,803 | $224,387 | $653,219 | $19,255,408 |
| 7. Supervision | 184,477 | $13,007,834 | $0 | $0 | $13,007,834 |
| **Totals** | **1,449,968** | **$111,130,958** | **$13,700,371** | **$56,447,115** | **$181,278,444** |

**Table 2: Total EPA Burdens And Costs for CY-2023-2025**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|   |   |   |  EPA OAQPS |   |   |
|   |  EPA Regional Offices | OID  | AQAD  |  Total EPA |
| Item | Hours | Costs | Hours | Costs | Hours | Costs | Hours | Costs |
| 1. NAMS/SLAMS/PAMS/ Sensors oversight | 78,936 | $5,593,721 | - | - | 44,680 | $3,764,558 | 123,616 | $9,358,279 |
| (includes site visits, annual |   |   |   |   |   |   |   |   |
| network review, asset management) |   |   |   |   |   |   |   |   |
| 2. QA audits (includes perf. audits | 31,551 | $2,235,830 | - | - | - | - | 31,551 | $2,235,830 |
| NPAP, & systems audits) |   |   |   |   |   |   |   |   |
| 3. Regional monitoring meeting | 4,735 | $335,541 | - | - | - | - | 4,735 | $335,541 |
| with States |   |   |   |   |   |   |   |   |
| 4. National or regional monitoring | 3,486 | $247,032 | - | - | - | - | 3,486 | $247,032 |
| meetings |   |   |   |   |   |   |   |   |
| 5. 105 Grant activities | 13,096 | $928,035 | - | - | - | - | 13,096 | $928,035 |
| 6. Other items | 7,489 | $530,700 | - | - | - | - | 7,489 | $530,700 |
| 7. Methods development in support of | - | - | - | - | - | - | - | - |
| regulatory program, and reference  |   |   |   |   |   |   |   |   |
| and equivalent activities  |   |   |   |   |   |   |   |   |
| 8. In-house burdens for AIRS/AQS | - | - | 10,296 | $867,500 | - | - | 10,296 | $867,500 |
| (includes AIRS Exec, AIRS TTN |   |   |   |   |   |   |   |   |
| Web/Homepage, AQI conference,  |   |   |   |   |   |   |   |   |
| training) |   |   |   |   |   |   |   |   |
| 9. Contractor support including | - | - | 3,000 | $625,000 | - | - | 3,000 | $625,000 |
|  hot line, enhancements |   |   |   |   |   |   |   |   |
|  maintenance, training, etc. |   |   |   |   |   |   |   |   |
| 10. Hardware/software NCC  | - | - | - | $664,222 | - | - | - | $664,222 |
|  burden, national AQS costs |   |   |   |   |   |   |   |   |
| 11. AIR NOW | - | - | - | $1,108,838 | - | - | - | $1,108,838 |
| 12. Other (software purchased | - | - | - | $50,000 | - | - | - | $50,000 |
|  internal support |   |   |   |   |   |   |   |   |
| **Totals** | **139,293** | **$9,870,859** | **13,296** | **$3,315,560** | **44,680** | **$3,764,558** | **197,269** | **$16,950,977** |

|  |  |  |
| --- | --- | --- |
|  | Base Rate | With 60% Overhead Adjustment Factor |
| Regional hourly average of 2023 GS 12-10 used |  $44.29  |  $70.86  |
| HQ hourly average of 2023 GS 13-10 used |  $52.66  |  $84.26  |