

Information Collection Request (ICR)
Supporting Statement A

EXECUTIVE SUMMARY

Title: Compliance Assurance Monitoring Program (40 CFR Part 64) (Renewal)

EPA ICR Number: 1663.11

OMB Control Number: 2060-0376

[Abstract](#)

In keeping with the requirements of the Title V operating permit program (codified at 40 CFR, Parts 70 and 71), the CAM Rule requires monitoring, compliance certification, periodic reporting, and recordkeeping information collections by owners and operators of title V sources¹ with controlled pollutant-specific emissions units (PSEUs) that have a pre-control potential to emit major amounts of regulated air pollutants. In addition, where the permitting authority has determined that the source has not used acceptable procedures in response to an excursion or exceedance, the CAM Rule allows permitting authorities (PAs) to require sources to prepare and implement Quality Improvement Plans (QIPs) and keep records of, and submit reports on, corrective actions taken under QIPs.

The CAM Rule identifies two categories of emissions units:

- (1) **“Large” PSEUs:** units that have the potential to emit, with controls, the applicable regulated air pollutant in an amount equal to or greater than the amount required for a source to be classified as a major source, and
- (2) **“Other” PSEUs:** the set of remaining affected PSEUs.

These two types of units are subject to different monitoring frequency requirements, but not to different reporting or recordkeeping requirements, which are the subject of this ICR. Additionally, “large” and “other” units were initially subject to different implementation timetables under Part 64. However, this program has been in place long enough that all existing “large” and “other” PSEUs that became subject to the CAM Rule at the time of its promulgation have been integrated into the program as their Title V permits have been renewed. New PSEUs of both types are covered under the CAM program in the same manner; both types of units become subject to the CAM program at the time that a new Title V permit is issued for a new facility or an existing permit is revised to add the new unit(s). For these reasons, this analysis does not differentiate between “large” and “other” units.

Upon approval by the PA of the monitoring proposed by the source, the source uses the approved monitoring method to collect data. These data provide the basis on which owners or operators can certify, in accordance with the requirements of the title V operating permit program, the compliance of

¹ For purposes of simplicity, this ICR applies the terms “owners and operators,” “firm,” and “sources” interchangeably. References to actions or responsibilities of sources or firms should be interpreted as referring to the owners and operators of that source or firm.

their emissions units with the applicable requirements. In addition, these data provide the basis on which owners or operators submit monitoring reports on no less than a semi-annual basis, as required by the Title V operating permit program. Consistent with the recordkeeping period established in the Title V operating permit program, CAM requires sources to store and maintain these data for at least 5 years.

In the next 3 years, the information collection requirements of the CAM program will impact all new affected pollutant points (i.e., new PSEUs at new facilities and new PSEUs constructed at existing facilities) and any new and existing affected pollutant points for which QIPs must be developed. The EPA estimates that over the three-year period of this ICR, the CAM program will apply to approximately 22,036 emissions units and 117 PAs (total of approximately 22,200 respondents). This ICR estimates the expected average annual burden over the next 3 years to be about 23,500 hours, at an expected cost of about \$2.42 million, for a total number of 9,388 responses. The activities at sources leading to these impacts include:

- Determination of a monitoring approach for new affected PSEUs;
- Preparation of a QIP, if necessary;
- Administrative burden for recordkeeping and reporting of corrective actions associated with a QIP;
- Installation and operation of monitoring equipment, if necessary;
- Administrative burden for recordkeeping and reporting;
- Upgraded operating/maintenance activities;
- Improved quality assurance; and
- Permit fees to cover regulatory costs of the program.

For this ICR, we have used data from the 2019 ICR for the title V operating permit program implemented by state agencies (i.e., the part 70 program) that reflect current information on the number of existing and new title V permits that may include units that are subject to the CAM Rule.

In addition, we reviewed and updated, where necessary:

- Labor rates;
- Estimates of labor hours needed for each activity associated with CAM monitoring (CAM approach development and review, QIP development and review, record-keeping and reporting); and
- The implementation schedule for CAM using current title V data for both existing and new sources.

We make specific assumptions about permit approvals and renewals in order to project when sources would submit their proposed monitoring approaches. We make the following assumptions to develop an implementation schedule that is consistent with the Part 64 language:

- All existing affected PSEUs have submitted their proposed monitoring approaches.
- Approximately 20 percent of existing title V permits are renewed during each year.
- Each year, title V permits will be issued for 100 new facilities. These facilities will have the same average number of PSEUs as in the full CAM database.

- There is homogeneity between sources and PSEUs. Therefore, if 10 percent of all title V permits are renewed at a given time, 10 percent of all affected PSEUs will be subject to renewal of their CAM plans on that date.
- The recordkeeping and reporting requirements for the CAM Rule for existing PSEUs are met by the requirements set forth in title V, unless a QIP is required. Therefore, in this ICR we are only attributing the recordkeeping and reporting requirements for those existing sources that are required to conduct a QIP.

Additionally, we assume that some new PSEUs would be built each year at existing permitted facilities, thus requiring a permit revision. We assume that 230 facilities nationwide would build additional PSEUs each year.

The total annual burden hours and costs for source and PA respondents are reported in Table 6.6. As shown in the table, sources are estimated to incur 19,300 labor hours and about \$2,190,000 per year, while PAs are estimated to incur 4,210 labor hours and \$233,000 annually; therefore, the total burden for all respondents comes to about 23,500 hours and \$2,420,000 per year. The title V operating permit program requires the cost of administering a title V permit program to be fully repaid out of the permitting fees collected by the PA. Therefore, the true cost of the CAM Rule to states and other PAs is zero, and the cost of administration should be allocated to sources.

1. NEED AND AUTHORITY FOR THE COLLECTION

Information collected as part of this information collection request (ICR) is used to issue operating permits and manage the CAM program. The operating permit program requires owners or operators of units that emit air pollutants to submit annual compliance certifications and monitoring results at least semi-annually, and to report deviations promptly, but no implementation guidance is provided within the operating permit program. The CAM program ensures sources that use active air emission control devices pay attention to those devices by monitoring their performance on an ongoing basis. The CAM rule establishes the requirements to implement that monitoring for the operating permit program in a cost-effective manner.

The Clean Air Act (Act) Amendments of 1990, Public Law 101-549, enacted on November 15, 1990, establish the legal authority for this information collection. Section 502(b) directs EPA to promulgate regulations that require owners or operators of certain stationary sources of air pollution to conduct monitoring and to make compliance certifications. These provisions are set forth in both title V (operating permits provisions) and title VII (enforcement provisions) of the 1990 Amendments.

Title V directs the agency to implement monitoring and compliance certification requirements through the operating permits program. Section 503(b)(2) requires annual certifications of compliance with permit requirements and prompt reporting of deviations from permit requirements. Section 504(a) mandates that owners or operators submit to the PA the results of any required monitoring at least every 6 months. This section also requires permits to include “such other conditions as are necessary to assure compliance with applicable requirements” of the Act. Section 504(b) of the Act also allows the agency to prescribe, by rule, methods and procedures for determining compliance, and states that continuous emission monitoring systems need not be required if other methods or procedures provide sufficiently reliable and timely information for determining compliance. Under section 504(c), each

operating permit must “set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.”

Title VII of the 1990 Amendments added 114(a)(3) – a new section that requires the EPA to promulgate rules on enhanced monitoring and compliance certifications. This paragraph provided, in part:

“The Administrator shall in the case of any person which is the owner or operator of a major stationary source, and may, in the case of any other person, require enhanced monitoring and submission of compliance certifications. Compliance certifications shall include (A) identification of the applicable requirement that is the basis of the certification, (B) the method used for determining the compliance status of the source, (C) the compliance status, (D) whether compliance is continuous or intermittent, (E) such other facts as the Administrator may require.”

The 1990 Amendments also revised section 114(a)(1) of the Act to provide additional authority concerning monitoring, reporting and recordkeeping requirements. As amended, that section provides the Administrator with the authority to require any owner or operator of a source, on a one-time, periodic, or continuous basis to:

- Establish and maintain such records;
- Make such reports;
- Install, use, and maintain such monitoring equipment;
- Sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- Keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions isn't practical;
- Submit compliance certifications in accordance with section 114(a)(3); and
- Provide such other information as the Administrator may reasonably require.

Obtaining ongoing compliance is a two-step process. First, the agency must assure properly designed control measures are installed or otherwise employed. These measures include control devices, process modifications, operating limitations, and other control measures, as applicable. Furthermore, the agency must assure the control measures are proven to be capable of achieving applicable requirements. In the past, this step has been addressed through new source review permitting, initial stack testing, compliance inspections and similar mechanisms. The title V permit application and review process, including the applicant's initial compliance certification and compliance plan obligations, add another tool for assuring that source owners or operators have adopted proper control measures for achieving compliance.

The second step involves monitoring by sources to determine continued assurance that the source's control measures, once installed or otherwise employed, are properly operated and maintained so that they do not deteriorate to the point where the owner or operator fails to remain in compliance with applicable requirements. The agency believes that monitoring, reporting, recordkeeping and ongoing or recurring compliance certification requirements under titles V and VII should be designed so that owners or operators carry out this second step in assuring ongoing compliance. The agency has adopted the

CAM approach to assure the proper operation and maintenance of control measures employed by sources. The CAM Rule establishes monitoring to:

- Document continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements;
- Indicate any excursions from these ranges; and
- Respond to the data so that excursions are corrected.

This type of monitoring is an appropriate approach to enhanced monitoring in the context of title V permitting for significant emission units that use control devices to achieve compliance with emission limits. In particular, the CAM Rule:

- Provides cost-effective achievement of air pollution emission reductions;
- Establishes voluntary compliance and self-certification by owners or operators; and
- Holds owners or operators accountable for regulated air pollutants emitted by units.

2. PRACTICAL UTILITY/USERS OF THE DATA

Owners or operators of affected emissions units will use information collected as part of this ICR as the basis for the compliance certification required by the operating permit program, and as the basis for compliance assurance monitoring reports. Sources will also use the information to determine and maintain the efficiency of the process or emissions control devices.

The Pas will use the information collected and submitted in permit applications in determining acceptability of proposed compliance assurance monitoring. The Pas will use source monitoring data to assess compliance, as input into reports to other agencies, and, when necessary, as evidence in enforcement proceedings. The Pas will use the information on excursions and exceedances collected from owners or operators to require the development and implementation by source operators of a QIP, when necessary. The QIP will address the timetable, methods and procedures for dealing with these excursions and exceedances.

The Pas will also collect summaries of information on compliance and will review the information as part of their permitting responsibilities and ongoing compliance activities. The information may be entered into local, regional, or national databases for review and action by air pollution control agencies. Other Federal entities, such as the Department of Energy, may request and use the information collected to fulfill specific mission objectives. Citizens may request the information collected in order to determine the compliance status of any emissions unit or particular group of emissions units.

3. USE OF TECHNOLOGY

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

4. EFFORTS TO IDENTIFY DUPLICATION

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to either the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

5. MINIMIZING BURDEN ON SMALL ENTITIES

The Agency assessed the impacts of the CAM Rule on small businesses, governments, and organizations in Chapter V of the rule's Regulatory Impact Analysis in 1997. This assessment still holds true, indicating the CAM Rule will not have a significant impact on a substantial number of small entities (SISNOSE). For additional discussion on this assertion, the Agency invites the reader to review the CAM Rule RIA and ICR from 1997.

6. EFFECTS OF LESS FREQUENT COLLECTION

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

7. GENERAL GUIDELINES

The recordkeeping and reporting requirements contained in the CAM program regulations do not exceed any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.5(d)(2), except for the guideline which limits retention of records by respondents to 3 years. The CAM program and the operating permit program require both respondents and either state or local agencies to retain records for a period of 5 years. The justification for this exception is found in 28 U.S.C. 2462, which specifies 5 years as the general statute of limitations for Federal claims in response to violations by regulated

entities. The decision in *U.S. v. Conoco, Inc.*, No. 83-1916.E (W.D. Okla., January 23, 1984) found that the 5-year general statute of limitations applied to the Clean Air Act.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the Federal Register for this renewal.

8b. Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 22,200 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Ford Motor Company, at 313-845-8364, and the Maryland Air Permits Division, at 410-537-4129. In this case, no comments were received.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first Federal Register notice. In this case, no comments were received.

9. PAYMENTS OR GIFTS TO RESPONDENTS

No payments or gifts are provided to respondents.

10. PROVISIONS FOR PROTECTION OF INFORMATION

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 (CBI) (see 40 CFR 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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

12. ESTIMATE OF RESPONDENT BURDEN HOURS & LABOR COSTS

12a. Respondents/NAICS Codes

The CAM Rule applies to most North American Industry Classification System (NAICS) code groups (and their predecessors, the Standard Industrial Classification (SIC) code groups), as well as for certain service industries regulated under the Act. All PAs also are affected because they must review CAM plans, as well as any QIPs and associated reports.

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the Compliance Assurance Monitoring rule (40 CFR Part 64).

FIGURE 4-1

DATA REQUIRED BY THE INFORMATION COLLECTION

Additional Requirements for Permit Applications	Regulation Reference
For all major source pollutant-specific emission units that satisfy the applicability criteria outlined in 64.2, the owner or operator shall submit a proposed monitoring approach to the PA. The monitoring approach shall be submitted as part of the initial, revised, or renewed part 70 or 71 permit application.	§64.5

Consistent with the design requirements in 64.3, the submission shall include the following information:

the indicators to be monitored to satisfy 64.3(a)(1)-(2).	§64.4(a)(1)
either (i) the ranges or designated conditions for such indicators or (ii) the process by which such indicator ranges or designated conditions shall be established.	§64.4(a)(2)
the performance criteria for the monitoring to satisfy 64.3(b).	§64.4(a)(3)
if applicable, the indicator ranges and performance criteria for a CEMS, COMS, or PEMS pursuant to 64.3(d).	§64.4(a)(4)

As part of the information submitted, the owner or operator shall submit:

a justification for the proposed elements of monitoring. The justification shall include any supporting data and may refer to any generally available sources of information such as air pollution engineering manuals or EPA or PA publications. In addition, the owner or operator may base the required justification exclusively on the regulatory precedents cited in 64.4(b)(1)-(5). If the performance specifications proposed to satisfy 64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences.	§64.4(b)
control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of applicable compliance or performance tests. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges.	§64.4(c)(1)
documentation to certify that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place.	§64.4(c)(2)

Existing data from unit-specific compliance or performance testing specified in 64.4(c) are not available, the owner or operator:

shall submit a test plan and schedule for obtaining such data; or	§64.4(d)(1)
may submit indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in 64.3(a).	§64.4(d)(2)

If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use for the purposes of part 64, the owner or operator shall include:

an implementation plan and	§64.4(e)
schedule for installing, testing, and performing any other appropriate activities prior to the use of the monitoring.	§64.4(e)

Submit monitoring reports in accordance with 70.6(a)(3)(iii). In addition, the monitoring report shall include:

summary information of the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances and the corrective actions taken.	§64.9(a)(2)(i)
---	----------------

summary information of the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).	§64.9(a)(2)(ii)
a description of the actions taken to implement a quality improvement plan (QIP) specified in 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	§64.9(a)(2)(iii)

Records shall be maintained in accordance with the requirements specified in 70.6(a)(3)(ii). In addition, the records shall include:

any written QIP required pursuant to 64.8	§64.9(b)
any corrective actions taken to implement a QIP	§64.9(b)

For all affected pollutant-specific units, an annual compliance certification is required. As part of the compliance certification, it is necessary to identify:

each term or condition of the permit that is the basis of the certification.	§70.6(c)(5)(iii)(A) §71.6(c)(5)(iii)(A)
the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.	§70.6(c)(5)(iii)(B) §71.6(c)(5)(iii)(B)
the status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent.	§70.6(c)(5)(iii)(C) §71.6(c)(5)(iii)(C)
such other facts as the PA may require.	§70.6(c)(5)(iii)(D) §71.6(c)(5)(iii)(D)

12c. Respondent Activities

The following list displays typical activities sources will have to perform to meet the permit application, recordkeeping and reporting requirements of the CAM Rule:

- **Review Requirements:** Review the part 64 requirements to determine applicability. This is a one-time task for each newly-permitted facility, rather than each PSEU. This is assumed to require the same level of effort for each new title V facility with potentially subject PSEUs, regardless of the type of PSEUs (“Large” or “Other”) at the facility or the type of monitoring approach (instrumental or work practice) required for each.
- **Determine Monitoring Approach:** Determine a CAM monitoring approach for each control device for which a facility is required to propose a specific monitoring approach for PSEUs [per

§§64.4(g) and (f)]. Each monitoring approach should specify the proposed technique (e.g., continuously recording combustion temperature at the incineration point of effluent gases in a thermal oxidizer), identify the frequency and method of data collection, establish performance criteria and recommend a quality assurance program.

- **Specify Monitoring Plan Elements:** Specify the CAM monitoring elements for each PSEU; that is, identify how the proposed monitoring approach will be implemented. This activity requires the facility to select performance indicators for each subject control device. The indicators establish monitoring performance characteristics and must provide reliable data for detection of significant adverse changes in control equipment performance. For the selected indicators, the design criteria must also: (1) specify operating ranges that reflect normal operating conditions, and (2) propose data collection sufficient to document continued operation of the control device in a satisfactory manner.
- **Design Documentation:** Develop and submit justification that supports the proposed monitoring approach for each PSEU. The type of documentation required could reference generally available information, existing applicable requirements, or site-specific data, if available. The documentation should demonstrate the adequacy of proposed indicator ranges to detect significant adverse changes in control performance. The language of the CAM Rule requires site-specific testing to be used in establishing indicator ranges unless the facility can justify using other information, such as manufacturer's data or engineering assessments. Generally, existing site-specific test data will be applicable.
- **CAM Renewal:** At the time of title V permit renewal, prepare and submit the information required by the permitting authority for PSEUs with previously established CAM monitoring. Any desired revisions to the established CAM monitoring should also be addressed in the permit renewal application. The burden assumed for this activity reflects the effort incurred for CAM in addition to the general title V permit renewal burden (which is addressed in the ICRs for the title V program).
- **Prepare QIP:** Prepare a QIP if required to do so by the PA because an affected PSEU is not consistently maintaining compliance with the applicable emission limitation. The QIP initially includes procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the source modifies the plan to include procedures to improve the performance of the control system.
- **Records of Corrective Actions:** Record activities undertaken to implement a QIP to bring a PSEU back into compliance after an excursion outside the normal control system operating range or exceedance of the applicable limitation.
- **Reporting of Corrective Actions:** Along with the semi-annual reports required under the title V operating permit program, report the corrective actions taken to implement a QIP.
- **Facility Certification:** As part of the annual compliance certification required under the title V operating permit program for the entire source, include any PSEUs subject to the CAM Rule.

State and local PA respondents perform the following activities in administering the CAM Rule:

- **Rule Familiarization:** Read the CAM Rule and associated EPA guidance materials to become familiar with the requirements.
- **Determine Applicability:** Review applicability determinations submitted by sources.
- **Initial CAM Review:** Review the CAM plans submitted by sources and approve or require revisions.

- **Evaluate CAM Renewals:** As part of the review of title V permit renewal applications under the title V operating permit program, review the portions related to PSEUs subject to the CAM Rule.
- **Review QIPs:** Review the QIPs prepared by sources to determine if they are acceptable.
- **Review Reports of Corrective Actions:** As part of the review of the semi-annual reports required under the title V operating permit program, review any reports of corrective actions taken under a QIP to determine whether they are adequate to assure compliance on an ongoing basis.
- **Review Annual Facility Certifications:** As part of the review of the annual compliance certification required under the title V operating permit program for the entire source, review any compliance certifications for PSEUs subject to the CAM Rule.

During initial implementation of the CAM Rule, the timing for submission of the initial CAM plans required under Part 64 depended on whether existing affected units were classified as either “large” or “other.” However, the CAM program has been fully implemented for these existing PSEUs. Going forward, initial CAM plans for affected new “large” and “other” PSEUs must be submitted with the title V permit application for the new or modified facility at which the new PSEU is located.

Upon approval of the permit, and consistent with the requirements of the title V operating permit program, sources must collect the information specified in their permits in accordance with the collection frequency specified, maintaining these data for at least 5 years. Sources must also submit semi-annual monitoring reports and annual compliance certifications as required by the title V operating permit program.

If the approved CAM monitoring results show that a PSEU is not consistently maintaining compliance as indicated by excursions or exceedances, the PA may require the source to develop and implement a QIP. The source must subsequently record and report on the corrective actions taken to implement the QIP.

12d. Respondent Hour and Labor Burden

This section presents estimates of the burden hours expected to be incurred at sources with emission units affected by the CAM Rule in carrying out the activities identified above in section 4(b) (ii). Results are contained in Tables 6.1a, b, and c for each of the 3 years covered by this ICR, respectively. Columns A through E in these tables summarize annual burden impacts that an individual PSEU will incur for each activity.

In Tables 6.1a, b, and c, each PSEU that is subject to the CAM Rule is considered a respondent, except as otherwise indicated in the tables. The number of respondents in each row of these tables was estimated based on information on the number of new and existing title V permits taken from the 2019 ICR for the part 70 operating permit program and on data developed for the Regulatory Impact Analysis (RIA) that was prepared in 2008 for planned revisions to the CAM Rule that were never finalized. Those revisions would have added requirements for additional units that are not subject to the current CAM Rule, but would not have modified the existing requirements for units subject to the existing part 64. Therefore, the data pertaining to units subject to the existing part 64 can be used in this ICR, as they were in the previous ICR updates.

The assumptions underlying the number of respondents for each activity in Tables 6.1a, b, and c taken from the 2019 ICR for the part 70 program are as follows:

-
- Each year, 100 new facilities receive title V permits.
 - In 2024 (the second year of the part 70 ICR and the first year of this ICR) there will be 14,301 existing title V permits.

To estimate the number of respondents of each type (“large” or “other” PSEUs) for which CAM plans must be developed and submitted each year, we used the following equation and factors derived from the 2008 RIA:

$$P_{c,t} = RS \times S_c \times P_c \times A_c$$

Where:

- $P_{c,t}$ is the number of PSEUs in Category c expected to become subject to CAM at a given time. The Categories are “large” PSEUs and “other” PSEUs.
- RS is the number of relevant title V permits nationwide.
- S_c is the percent of sources expected to construct at least one new PSEU in Category c. For “large” PSEUs, $S_c = 11.5$ percent; for “other” PSEUs, $S_c = 34.8$ percent.
- P_c is the number of new Category c PSEUs expected to be constructed at a facility that has at least one Category c PSEU. For new facilities, P_c is 3.15 for “large” PSEUs and 7.06 for “other” PSEUs. For existing facilities adding new PSEUs, P_c is 1 for both “large” and “other” PSEUs.
- A_c is the percent of PSEUs in Category c that are projected to be subject to the CAM Rule. For “large” PSEUs, $A_c = 53.8$ percent; for “other” PSEUs, $A_c = 53.6$ percent.

Additional assumptions from the 2008 RIA used to estimate the number of respondents (PSEUs) for source activities include the following, which were also used in the previous ICR updates:

- 230 existing title V sources add PSEUs each year.
- Of affected “large” PSEUs, 56.3 percent are “without existing monitoring” and 43.7 percent are “with existing monitoring.”

- Of affected “other” PSEUs, 31 percent are “without existing monitoring” and 69 percent are “with existing monitoring.”
- All affected “large” PSEUs meet CAM Rule requirements using instrumental monitoring systems.
- All affected “other” PSEUs meet CAM Rule requirements using work practice monitoring approaches.

Additional assumptions used to estimate the number of respondents (PSEUs) for source activities include the following:

- All existing “large” and “other” PSEUs that became subject to the CAM Rule at the time of its promulgation have been integrated into the program as their title V permits were renewed.
- Thus, the only PSEUs for which CAM approaches and documentation must be developed and submitted during the period of this ICR are those at new facilities, which are receiving their initial title V permits, and those being constructed at existing facilities. As noted above, there are 100 new facilities and 230 existing facilities that construct PSEUs each year.
- Each new facility must review the requirements of the CAM Rule to determine whether its PSEUs are subject to the rule (Activity 1 in Tables 6.1a, b, and c). Note that the respondents for this activity are facilities, rather PSEUs.
- For the activities related to developing and documenting CAM plans, the number of respondents is determined using the equation above (Activities 2, 3, and 4).
- Each year, 20 percent of all existing title V permits are renewed, and thus CAM plans are renewed for 20 percent of all PSEUs each year (Activity 5).
- Each year, 0.04 percent of all existing and new PSEUs are required to prepare a QIP and record information and submit reports about corrective actions (Activities 6, 7, and 8). This number is based on the number of enforcement actions taken in a given year.
- All title V facilities are required to submit annual certifications, so there are no additional facilities with affected PSEUs that must submit such certifications (Activity 9).
- Each facility that has at least one affected PSEU has an average of 4.27 affected PSEUs. This factor is used to convert the per-PSEU impacts to per-facility impacts. This factor was derived from the data and analyses of the 2008 RIA.

Tables 6.1a, b, and c present the total burden and costs of the CAM Rule for sources in each of the 3 years covered by this ICR, respectively. Table 6.4 presents a summary of the burdens for these 3 years. The average annual labor burden reported in Table 6.4 is computed as the arithmetic average of the sum of the annual labor burden across the 3 years of the ICR. The national average annual labor burden for sources over the 3 years covered by this ICR is estimated to be about 19,300 hours at an estimated labor cost of about \$2,190,000. There are no annualized capital costs or O&M costs to report.

Column B in PA Tables 6.2a, b, and c gives the total number of occurrences of each activity each year, generally reflecting the number of PSEUs expected to be submitting CAM plans, renewals, QIPs, or certifications each year, and these values are based on the numbers of PSEUs carrying out the analogous activities listed in Column I of source Tables 6.1a, b, c. The exception is “rule familiarization” listed under the first activity in Tables 6.2a, b, and c, which is based on the number of PAs (117), rather than the number of PSEUs. Because the CAM program is now a mature, fully implemented program, the PAs are generally familiar with the CAM Rule. Accordingly, we have assumed that the technical labor burden (Column A) for each PA is 12 hours for new staff to familiarize themselves with the rule.

Tables 6.2a, b, and c present the total burden and costs of the CAM Rule for PAs in each of the 3 years covered by this ICR, respectively. Table 6.5 presents a summary of the burdens for these 3 years. Again, the average annual labor burden reported in Table 6.5 is computed as the arithmetic average of the sum of the annual labor burden across the 3 years of the ICR. The national average annual labor burden for PAs over the 3 years covered by this ICR is estimated to be less than 4,210 hours at an estimated labor cost of about \$233,000. There are no annualized capital costs or O&M costs to report.

The title V operating permit program requires the cost of administering a state permit program to be fully repaid out of the permitting fees collected by that State. Therefore, the true cost of the CAM Rule to states and other PAs is zero, and the recorded cost of administration should be allocated to sources.

Columns A and B represent the estimated burden hours for clerical and technical personnel, respectively. These burden estimates reflect the expert judgment of EPA staff, contractors, and industry experts. Column C represents the management labor hours associated with each activity, computed at a rate of 5 percent of the total clerical and technical labor. All burden estimates represent the increment over part 70 requirements.

For the activities associated with developing and documenting a CAM plan, we estimate different burdens for PSEUs depending on whether they are “without existing monitoring” or “with existing monitoring.” For the new PSEUs that become subject to the CAM Rule going forward, this is defined as follows:

- “Without existing monitoring” denotes PSEUs that are subject to emission limits and therefore must control emissions, but the applicable requirements do not specify monitoring requirements. For these PSEUs, the source must develop the entire monitoring program and documentation required by the CAM Rule.
- “With existing monitoring” denotes PSEUs whose applicable requirements include monitoring requirements, but these requirements are insufficient to meet the requirements of the CAM Rule. For these PSEUs, some of the monitoring elements are already present, and the source need only upgrade the monitoring program and documentation to meet the CAM Rule requirements.

We believe that sources with PSEUs “with existing monitoring” will experience less uncertainty about what is needed for adequate monitoring and, thus, developing a CAM plan and the necessary documentation for these units will require less effort than for PSEUs “without existing monitoring.” As a result, the estimated per-PSEU burden is greater for PSEUs “without existing monitoring.”

For one source activity, recordkeeping for corrective actions under a QIP, we estimate different burdens for PSEUs depending on whether the CAM monitoring relies on an instrumental system or uses work practices. We believe that there will be less recordkeeping burden for PSEUs monitored with instrumental systems because those systems employ electronic capturing and monitoring information that previously was attributed to manual labor. Automated processes can collect hundreds of data points per second; whereas humans require considerably longer to collect and process accurately the same information. Column D of Tables 6.1a, b, and c gives the annual occurrences of each source activity for each PSEU. There will be one occurrence of each activity per year except for reports of corrective actions, for which we project two occurrences consistent with the title V operating permit program

requirement for semi-annual reporting. Finally, Column E totals the burden hours incurred by a source for each PSEU.

Tables 6.2a, b, and c present estimates of the burden hours expected to be incurred by PAs in carrying out the activities identified in section 4(b)(ii) in each of the 3 years covered by this ICR, respectively. The burden estimates are based on the expert knowledge of EPA's staff. The technical labor estimates for these activities in Column A generally reflect the PA hours required to complete the activities for one PSEU. For review of CAM plans, the estimated level of effort is greater for sources "without existing monitoring" than for those "with existing monitoring" because we believe that PAs will need to apply greater scrutiny to CAM submissions from sources that must develop their entire monitoring program and documentation absent applicable monitoring requirements.

Column B in Tables 6.2a, b, and c shows the number of occurrences of each PA activity per year. In most cases, these numbers reflect the numbers of units expected to be submitting CAM plans, renewals, QIPs or certifications each year and, thus, are based on the numbers of PSEUs carrying out the analogous activities listed in Column I of source Tables 6.1a, b, and c (as discussed below in section 6(d)). Consistent with the title V operating permit semi-annual reporting requirement, the "number of occurrences" for the PA activity "review corrective action reports" is twice the number of units that will be expected to submit such reports each year. For Tables 6.2a, b, and c, the management burden hours in Column D are computed at a rate of 5 percent of the total annual technical labor for each PA activity that appears in Column C.

As noted, the estimated burden and number of occurrences for the PAs' activities in Columns A and B of Tables 6.2a, b, and c are generally based on individual PSEUs. The exception is the estimates for "rule familiarization" listed under the first activity in these tables, which are presented for each PA rather than each PSEU. Because the CAM program is now a mature, fully implemented program, the PAs are generally familiar with the CAM Rule. Accordingly, we have assumed that the technical labor burden (Column A) for each PA is limited to 12 hours for new staff to familiarize themselves with the rule. Column B reflects the number of PAs (117) rather than the number of PSEUs.

Estimating Respondent Cost

Tables 6.1a, b, and c show the sources' per-PSEU annual labor costs associated with each activity for each year covered by this ICR. This annual labor cost appears in Column F of each table.

This ICR uses the following labor rates:

Managerial	\$163.17 (\$77.70 + 110%)
Technical	\$130.28 (\$62.04 + 110%)
Clerical	\$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

For each source activity, Column F in Tables 6.1a through 6.1c displays the total labor cost per year assumed necessary to complete each required activity. For each activity, the appropriate wage rate is multiplied by the number of labor hours in that category from Columns A, B, and C, the three values are added together, and then that cost is multiplied by the number of annual occurrences from Column D.

Tables 6.2a, b, and c show the costs for state and local agency PAs for all activities. The methodology used to derive the state and local costs parallel the procedures used in the original CAM RIA and the previous ICRs. The hourly wage rates for both state and local personnel are derived from the rates paid to Federal workers who carry out such activities.

For technical labor, the hourly wage rate is based on 2023 wages at a pay grade of GS-12, Step 1 (\$54.51); managerial labor is based on a pay grade of GS-13, Step 5 (\$73.46). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality and rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees.

13. RESPONDENT ANNUAL COST (NON-LABOR)

Tables 6.1a, b, and c and Tables 6.2a, b, and c show the capital and operations and maintenance (O&M) costs as zero for all activities over the next 3 years. As explained above, the only capital costs to be included in an ICR are those for any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes. However, EPA assumes that any such equipment needed by sources to comply with Part 64 would be purchased as part of a monitoring equipment purchase and could not be separately estimated. Therefore, O&M costs for operating such capital equipment also could not be separately estimated. Other possible O&M costs associated with reporting and recordkeeping include such things as postage fees for submitting reports. However, Part 64 does not require any new reports to be submitted; rather, it provides that information related to CAM be included in reports otherwise required under the title V program codified at 40 CFR Part 70. Therefore, postage costs for these reports are attributable to Part 70 and not to Part 64. EPA estimates that there will be no capital/start-up costs or O&M costs attributable to the CAM Rule for sources or PAs.

14. AGENCY BURDEN ESTIMATES

Table 6.3 shows the burden and costs for EPA. Based on input from the EPA regional offices, we assume that each regional office devotes a total of approximately 0.1 of a “full-time equivalent” to CAM each year, or about 200 hours per regional office per year. Across the 10 EPA regional offices, this totals 2,000 hours per year. We assume that the majority of this time (about 1,880 hours) is spent reviewing CAM plans; the remaining time (about 120 hours) is allocated to rule familiarization for new staff.

We assume that 5 percent of the EPA’s total labor associated with the CAM Rule is managerial labor and the remaining 95 percent is technical labor. The cost of this effort is calculated using the same loaded labor rates discussed above for PAs. Based on these assumptions, the total estimated cost to the EPA is about \$111,000 per year for each of the 3 years covered by this ICR.

15.CHANGE IN BURDEN

There is an overall decrease of 1,080 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This decrease is due to a correction of mathematical errors found in the previous ICR renewal. While, the total estimated annual burden decreased, the total annual cost increased due to updated labor rates from the currently approved ICR.

The CAM program was designed to ensure monitoring provisions associated with the prevention of significant deterioration (PSD) program were included in the Title V permits and updated as necessary. The owners or operators were required to develop monitoring plans for sources with active control devices. The agency envisioned that, over time, all the title V permits would be issued and would require CAM rule requirements. Current burden reduction for the CAM rule is based on complete issuance of title V permits, meaning no additional sources with active control devices need CAM plans; only ongoing, not new, CAM is needed. Since there are no new CAM plans, only review of existing CAM plans, the renewal review hours drop. No changes to the CAM rule keep costs the same (i.e. no increase in burden). Moreover, familiarity with existing CAM plan requirements should reduce source and regulatory review burden.

16. PUBLICATION OF DATA

Collections results are not published.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18.CERTIFICATION STATEMENT

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

Table 6.1a: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2023-24

Burden Item ^c	Hours ^a and Costs ^b Per Respondents						(G) Total number of respondents	(H) Total hours/year (ExG)	(I) Total labor cost (FxG)
	(A) Clerical hours per occurrence	(B) Technical hours per occurrence	(C) Management hours per occurrence ([A+B]x0.05)	(D) Annual occurrences	(E) Annual person hours ([A+B+C]xD)	(F) Labor cost/year			
1. Review Requirements ^d	5	15	1	1	21	\$2,445.92	100	2100	\$244,592.00
2. Determine Monitoring Approach ^e									
A. Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$366.89	74	233.1	\$27,149.71
B. Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$122.30	134	140.7	\$16,387.66
3. Specify Monitoring Plan Elements ^e									
A. Units without existing monitoring	4	12	0.8	1	16.8	\$1,956.74	74	1243.2	\$144,798.46
B. Units with existing monitoring	2	6	0.4	1	8.4	\$978.37	134	1125.6	\$131,101.31
4. Design Documentation ^e									
A. Units without existing monitoring	0	4	0.2	1	4.2	\$553.75	74	310.8	\$40,977.80
B. Units with existing monitoring	0	2	0.1	1	2.1	\$276.88	134	281.4	\$37,101.52
5. CAM Renewal	1	2	0.15	1	3.15	\$350.75	4324	13620.6	\$1,516,623.54
6. Prepare QIP	5	20	1.25	1	26.25	\$3,138.11	9	229.2	\$27,399.49

7. Records of Corrective Actions									
A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.2	\$23.43
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.0	\$526.26
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs.

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.1b: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2024-25

Burden Item ^c	Hours ^a and Costs ^b Per Respondents						(G) Total number of respondents	(H) Total hours/year (ExG)	(I) Total labor cost (FxG)
	(A) Clerical hours per occurrence	(B) Technical hours per occurrence	(C) Management hours per occurrence ([A+B]x0.05)	(D) Annual occurrences	(E) Annual person hours ([A+B+C]xD)	(F) Labor cost/year			
1. Review Requirements ^d	5	15	1	1	21	\$2,445.92	100	2100	\$244,592.00
2. Determine Monitoring Approach ^e									
A. Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$366.89	74	233.1	\$27,149.71
B. Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$122.30	134	140.7	\$16,387.66
3. Specify Monitoring Plan Elements ^e									
A. Units without existing monitoring	4	12	0.8	1	16.8	\$1,956.74	74	1243.2	\$144,798.46
B. Units with existing monitoring	2	6	0.4	1	8.4	\$978.37	134	1125.6	\$131,101.31
4. Design Documentation ^e									
A. Units without existing monitoring	0	4	0.2	1	4.2	\$553.75	74	310.8	\$40,977.80
B. Units with existing monitoring	0	2	0.1	1	2.1	\$276.88	134	281.4	\$37,101.52
5. CAM Renewal	1	2	0.15	1	3.15	\$350.75	4324	13620.6	\$1,516,623.54
6. Prepare QIP	5	20	1.25	1	26.25	\$3,138.11	9	231.378	\$27,660.58

7. Records of Corrective Actions									
A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.179865	\$23.71
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.02801	\$531.08
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.1c: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2025-26

A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.182007	\$24.00
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.06455	\$535.90
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.2a: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2023-24

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
--------------------------	-------------------------------	--------------------------------	-------------------------------	--------------------------------	---

	occurrence ^b		year (AxB)	year (Cx0.05)	
1. CAM Activities					
A. Rule familiarization ^d	12	117	1404	70.2	\$81,688.93
B. Determine applicability	0.67	208	139.36	6.968	\$8,108.38
2. Initial CAM Review					
A. Units without existing monitoring	2	74	148	7.4	\$8,611.08
B. Units with existing monitoring	1	134	134	6.7	\$7,796.52
3. Evaluate CAM Renewals	0.5	4324	2162	108.1	\$125,791.65
4. Review QIPs	1	9	9	0.44	\$508.01
5. Review Reports of Corrective Actions	0.5	18	9	0.45	\$523.65
6. Review Annual Facility Certifications	0.33	0	0	0	\$0.00
TOTAL (rounded) ^e			4,010	200	\$233,000

Assumptions:

^a See section 4(b)(ii) for a description of these activities.

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.2b: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2024-25

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
--------------------------	-------------------------------	--------------------------------	-------------------------------	--------------------------------	---

	occurrence ^b		year (AxB)	year (Cx0.05)	
1. CAM Activities					
A. Rule familiarization ^d	12	117	1404	70.2	\$81,688.93
B. Determine applicability	0.67	208	139.36	6.968	\$8,108.38
2. Initial CAM Review					
A. Units without existing monitoring	2	74	148	7.4	\$8,611.08
B. Units with existing monitoring	1	134	134	6.7	\$7,796.52
3. Evaluate CAM Renewals	0.5	4324	2162	108.1	\$125,791.65
4. Review QIPs	1	9	9	0.44	\$512.85
5. Review Reports of Corrective Actions	0.5	18	9	0.45	\$523.65
6. Review Annual Facility Certifications	0.33	0	0	0	\$0.00
TOTAL (rounded) ^h			4,010	200	\$233,000

Assumptions:

^a See section 4(b)(ii) for a description of these activities.

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.2c: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2025-26

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
--------------------------	-------------------------------	--------------------------------	-------------------------------	--------------------------------	---

		occurrence ^b		year (AxB)	year (Cx0.05)				
Table 4.3A: Estimated Labor Hours and Costs for All "Large" and "Other" Sources - All Pollutants, 2024-26									
A. Rule familiarization ^d		12		117	1404	70.2	\$81,688.93	Three Year Total	
CAM Activities		Annual Burden							
B. Determine applicability		0.67		208	139.36	6,968	\$8,108.38		
		Technical	Management	Total Hours	Annual Cost ^b	Technical	Management	Total Hours	Annual Cost
2. Initial CAM Review		Hours	Hours			Hours	Hours		
A. Units without existing monitoring		114	6 2	74	148	7.4	\$8,611.08	359	\$19,899
a				120	\$6,633	342	17		
B. Units with existing monitoring			1	134	134	6.7	\$7,796.52		
3. Review CAM Plans ^a		1786	94 0.5	1880	\$104,260	108.58	\$25,791.65	5640	\$312,780
4. Review QIPs			1	9	9	0.44	\$517.69	5999	\$333,000
Total Cost and Burden (rounded) ^e		1900	100	2000	\$111,000	5700	299		
5. Review Reports of Corrective Actions			0.5	18	9	0.45	\$523.65		
6. Review Annual Facility Certifications			0.33	0	0	0	\$0.00		
^a We assumed 0.1 FTEs, or 200 hours per region per year; 200 hours/region * 10 regions = 2,000 hours/yr. We assumed the majority of the time is spent reviewing CAM Plans, so ^b was allocated to Rule familiarization for new staff.					4,010	200	\$233,000		

^b The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These 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.

^a See section 4(b)(ii) for a description of these activities.

^c Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6.4: Average Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual Total Hours	Annual Labor Cost	Annual Capital & O&M Cost	Total Annual Cost
2023 - 24	19,300	\$2,190,000	\$0	\$2,190,000
2024 - 25	19,300	\$2,190,000	\$0	\$2,190,000
2025 - 26	19,300	\$2,190,000	\$0	\$2,190,000
Total	57,900	\$6,570,000	\$0	\$6,570,000
Average	19,300	\$2,190,000	\$0	\$2,190,000

Year	# PSEUs Subject to CAM	Annual Total Hours	Hours per PSEU	Hours per Facility ^a
2023 - 24	21,828	19300	1	4
2024 - 25	22,036	19300	1	4
2025 - 26	22,244	19300	1	4
Total	66,108	57900	3	11
Average	22,036	19300	1	4

^a Assumes 4.27 PSEUs per facility

Table 6.5: Average Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual Total Hours	Total Annual Cost
2023 - 24	4,210	\$233,000
2024 - 25	4,210	\$233,000
2025 - 26	4,210	\$233,000
Total	12,631	\$699,000
Average	4,210	\$233,000

Table 6.6: Total Estimated Respondent Burden and Cost Summary

Type of respondent	Average annual number of respondents	Average annual labor hours	Average annual labor cost	Average annual capital and O&M cost	Average total annual cost	Average annual labor hours per respondent	Average annual cost per respondent
Sources ^a	22,036	19,300	\$2,190,000	\$0	\$2,190,000	1	\$99
PAs	117	4,210	\$233,000	\$0	\$233,000	36	\$1,991
Total (rounded) ^b	22,200	23,500	\$2,420,000	\$0	\$2,420,000		

^a For sources, the number of respondents is the number of PSEUs subject to the CAM Rule. There are an average of 4.27 affected PSEUs per facility with at least one PSEU.

^b Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.