

Information Collection Request Supporting Statement Part A

EXECUTIVE SUMMARY

Title: Implementation of the Fine Particulate Matter National Ambient Air Quality Standards (Extension)

EPA ICR Number: 2258.06

OMB Control Number: 2060-0611

Abstract

The EPA has established a suite of PM_{2.5} standards based on numerous health studies and other evidence demonstrating that serious health effects are associated with exposure to elevated levels of PM_{2.5}. Estimates show that attainment of the PM_{2.5} standards would result in tens of thousands fewer premature deaths each year, tens of thousands fewer hospital admissions each year, and hundreds of thousands fewer doctor visits, absences from work and school, and respiratory illnesses in children annually. EPA initially established annual and 24-hour PM_{2.5} standards in 1997. The 24-hour standard was subsequently revised in 2006, and the primary annual standard was revised in 2012. This ICR applies to existing nonattainment areas for existing standards.

The EPA finalized the PM_{2.5} NAAQS State Implementation Plan (SIP) Requirements Rule (81 FR 58010) effective October 24, 2016, to describe the Clean Air Act (CAA) requirements that must be met by states with nonattainment areas to develop plans for attaining and maintaining the NAAQS. The intended effect of the PM_{2.5} NAAQS SIP Requirements Rule is to provide certainty to states regarding their planning obligations related to SIP development for current and future levels of the PM_{2.5} NAAQS (although this ICR applies only to current standards). Only states with nonattainment areas are required to submit SIPs that meet the requirements of this rule.

On December 18, 2014, the EPA designated fourteen areas as nonattainment for the 2012 PM_{2.5} NAAQS (78 FR 3086). The EPA conducted an analysis for ICR Number 2258.04 using the initial fourteen nonattainment areas. The estimate also included the estimated burden associated with ongoing implementation obligations for the remaining areas designated nonattainment for the 1997 and/or 2006 PM_{2.5} NAAQS. The EPA requested comment on this analysis in the proposed PM_{2.5} NAAQS SIP Requirements Rule (80 FR 18177) and received no comments. After proposing the PM_{2.5} NAAQS SIP Requirements Rule, the EPA revised initial area designations for several 2012 PM_{2.5} NAAQS areas on March 31, 2015 (80 FR 18535). This designation action revised the count from 14 to nine nonattainment areas, while several counties in three states remained deferred. In light of the lack of comments on the initial estimate, and to ensure that the final estimate was not an underestimate in light of uncertainty, the EPA did not revise its estimate for ICR Number 2258.04.

On February 1, 2021, the EPA issued ICR Number 2258.05 that estimated the burden associated with on-going implementation planning for 18 nonattainment areas for one or more of the 1997, 2006 and 2012 PM_{2.5} NAAQS for the 2021-2024 period. This proposed renewal for ICR Number 2058.06, for the 2024-2027 period, estimates the burden associated with implementing one or more of the 1997, 2006 and 2012 PM_{2.5} NAAQS for the remaining 12 nonattainment areas.

The information collection activities in this proposed renewal have been submitted for approval to the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA). The PRA requires the EPA to assess the administrative burden (in hours and dollars) for state air agencies to develop plans to attain the PM_{2.5} NAAQS, and for EPA to review and take action on such plans. This proposed ICR renewal covers the period February 1, 2024-January 31, 2027.

The EPA estimates the administrative burden for states with nonattainment area planning requirements for one or more of the 1997, 2006 and 2012 PM_{2.5} NAAQS to be 74,700 hours over three years. The present value of the total costs for state governments (the respondents) is estimated at \$5.3 million for the 3-year period, or \$1.76 million per year during the 3-year period of the ICR.

The estimated administrative burden for EPA is estimated to be 8,217 hours. The present value of the Agency administrative cost burden is estimated at \$0.58 million dollars for the 3-year period, or \$0.19 million per year during the 3-year period.

SUPPORTING STATEMENT PART A

1. NEED AND AUTHORITY FOR THE COLLECTION

The CAA requires the EPA to establish National Ambient Air Quality Standards (NAAQS) for air pollutants that may reasonably be anticipated to endanger public health or welfare, and which result from numerous or diverse sources. On July 18, 1997, the EPA revised the NAAQS for particulate matter to add new standards for fine particulate matter (particles of solid and liquid material less than 2.5 microns in aerodynamic diameter, or PM_{2.5}). The EPA established health-based (primary) annual and 24-hour standards for PM_{2.5} (62 FR 38652). The annual standard was set at a level of 15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), based on the 3-year average of annual mean PM_{2.5} concentrations. The 24-hour standard was set at a level of 65 $\mu\text{g}/\text{m}^3$, based on the 3-year average of the 98th percentile of 24-hour concentrations. The welfare-based secondary standards were established identical to the primary standards.

Part D of Title I of the Clean Air Act sets forth the implementation plan requirements for areas designated nonattainment for a NAAQS. The PM_{2.5} Implementation Rule for the 1997 PM_{2.5} NAAQS was proposed November 1, 2005 (70 FR 65983) and was promulgated on April 25, 2007 (72 FR 20586). The preamble to the proposed and final regulation addressed the administrative burden associated with attainment planning for the 1997 NAAQS in general terms. The preamble to the final rule stated that an ICR would be prepared.

On October 17, 2006, the EPA revised the NAAQS for fine particles. The EPA established new primary 24-hour standards for PM_{2.5} (71 FR 61144). The 24-hour standards (primary and secondary) were set at a level of 35 $\mu\text{g}/\text{m}^3$, based on the 3-year average of the 98th percentile of 24-hour concentrations. The primary and secondary annual standards remained unchanged at a level of 15

$\mu\text{g}/\text{m}^3$, based on the 3-year average of annual mean $\text{PM}_{2.5}$ concentrations. The initial ICR 2258.01 covered the time period between April 5, 2008 through April 4, 2011. An extension without change of ICR 2258.02 was subsequently issued through April 30, 2012.

On December 14, 2012, the EPA once again revised the NAAQS for fine particles. The EPA established a new primary annual standard for $\text{PM}_{2.5}$ (78 FR 3086). The annual standard was set at a level of $12 \mu\text{g}/\text{m}^3$, based on the 3-year average of annual mean $\text{PM}_{2.5}$ concentrations. The 24-hour standard remained unchanged at a level of $35 \mu\text{g}/\text{m}^3$, based on the 3-year average of the 98th percentile of 24-hour concentrations. The time period covered in the ICR 2258.03 was a 3-year period from May 1, 2012 through April 30, 2015. ICR 2258.03 was issued a 60-day extension from April 30, 2015 through June 30, 2015. The ICR 2258.03 lapsed on July 1, 2015.

Following a January 2013 decision by the U.S. Circuit Court of Appeals for the D.C. Circuit that remanded the 2007 $\text{PM}_{2.5}$ Implementation Rule, on March 23, 2015, the EPA proposed the $\text{PM}_{2.5}$ NAAQS SIP Requirements Rule and finalized the rule on August 24, 2016. This rule provided the framework for states to follow in developing SIPs to attain the 1997 $\text{PM}_{2.5}$ NAAQS, the 2006 $\text{PM}_{2.5}$ NAAQS and the 2012 $\text{PM}_{2.5}$ NAAQS.

The framework in the rule reflects the applicable requirements described in the CAA part D nonattainment area provisions found in sections 172 (subpart 1) and sections 188-190 (subpart 4). A $\text{PM}_{2.5}$ attainment plan must include rules requiring emission reductions and a demonstration showing whether the particular area can attain the standard by its attainment date. A state plan submittal for attaining the $\text{PM}_{2.5}$ NAAQS is due to EPA within 18 months after the effective date the area is designated as nonattainment. After a state submits a plan, the CAA requires the EPA to review the plan, and take action on the plan which EPA does through a regulatory action. Once an area is attaining the NAAQS, the state (or area) may request a redesignation from “nonattainment” to “attainment.” This requires the state to develop a maintenance plan to demonstrate that the area will continue to maintain the NAAQS during a 10-year maintenance period and meet other CAA requirements associated with redesignation to attainment.

ICR 2258.04 was included with the final 2016 $\text{PM}_{2.5}$ NAAQS SIP Requirements Rule. ICR 2258.05 received several extensions and expires January 31, 2024. This supporting statement for ICR 2258.06 covers February 1, 2024- January 31, 2027.

2. PRACTICAL UTILITY/USERS OF THE DATA

The data collected from the state and local air agency respondents will include the nonattainment SIP elements and maintenance plan requirements under the CAA that are described in more detail in the $\text{PM}_{2.5}$ NAAQS SIP Requirements Rule. Attainment plans for the $\text{PM}_{2.5}$ NAAQS nonattainment areas must contain state rules and other requirements designed to achieve the NAAQS by the deadlines established under the CAA. Maintenance plans, should a state choose to pursue redesignation for a nonattainment area once its air quality shows attainment, must contain requirements designed to maintain the NAAQS for a 10-year maintenance period.

The PM_{2.5} attainment plan submitted by the state must meet the various requirements in subpart 1 and subpart 4 and guidance, including the following:

- Baseline emission inventory and projection year inventory for stationary, mobile, and area emissions sources in the nonattainment area consistent with 40 CFR 51.1008.
- For Moderate areas, an analysis of economic and technological feasibility of potential control measures (i.e., reasonably available control measures (RACM) and reasonably available control technology (RACT)) and the adoption of state rules requiring emission reductions to ensure attainment of the standard “as expeditiously as practicable,” consistent with 40 CFR 51.1007 and 51.1009.
- For Serious areas, an analysis of economic and technological feasibility of potential control measures (i.e., best available control measures (BACM) and best available control technology (BACT)) and the adoption of state rules requiring emission reductions to ensure attainment of the standard “as expeditiously as practicable,” consistent with 40 CFR 51.1010.
- For those Serious areas that fail to meet the Serious area attainment date, the state must submit a SIP revision consistent with CAA section 189(d) which provides an annual reduction in PM_{2.5} or its precursor emissions of not less than 5 percent, within 12 months after the applicable attainment date.
- An attainment date consistent with 40 CFR 51.1004.
- An attainment demonstration with air quality modeling showing that existing federal and state emission reduction programs, plus any new emission reduction programs adopted by the state, will result in expeditious attainment by the attainment date, consistent with 40 CFR 51.1011. The attainment demonstration must meet the requirements of 40 CFR 51.112 and Part 51, Appendix W, and must include emission inventory data, modeling results, and emission reduction analyses on which the state has based its projected attainment date.
- An optional precursor demonstration to demonstrate out of the requirements under subpart 4 to regulate PM_{2.5} precursors for attainment and nonattainment new source review purposes.
- A plan showing that future emission reductions will provide for reasonable further progress (RFP) toward attainment of the standard for the period prior to the area’s attainment date, consistent with 40 CFR 51.1012; and reporting every 3 years on quantitative milestones showing progress in the implementation of the attainment plan and associated control measures, consistent with 40 CFR 51.1013.
- Contingency measures to promptly correct NAAQS violations.

In addition, all areas designated attainment must have a preconstruction permit program (prevention of significant deterioration or PSD program) and all areas designated nonattainment must have a nonattainment new source review (NNSR) program. This ICR does not cover the PSD or NNSR programs.

If a state chooses to seek redesignation for a nonattainment area that is no longer violating the NAAQS, the PM_{2.5} maintenance plan submitted by the state must include the various requirements in subpart 1 and subpart 4, and guidance including:

- Baseline emission inventory and projection year inventory for stationary, mobile, and area emissions sources in the nonattainment area consistent with 40 CFR 51.1008.
- A demonstration that the area will continue to attain for the 10-year period following the redesignation, including air quality modeling.

- Verification of continued attainment, including tracking progress through updating the inventory, re-evaluate modeling assumptions or inputs or other methods as needed.
- Contingency measures to promptly correct NAAQS violations that occur after the redesignation.

The states use this information and analysis to fulfill federal obligations under Title I, part D of the CAA and the PM_{2.5} NAAQS SIP Requirements Rule.

The EPA regional and headquarters offices will use the submitted information in determining the completeness and adequacy of the various elements of the PM_{2.5} attainment or maintenance plan. The EPA is required under the CAA to take action on a SIP submission within 12 months of the submission being found complete. Emission reduction regulations developed by the states and included in the SIP submission, become federally enforceable when approved by the EPA. EPA takes action on SIP submissions through a regulatory process.

3. USE OF TECHNOLOGY

The PM_{2.5} attainment and optional maintenance plans submitted by air agencies will set forth the data sources, analytical methods, and emission reduction and air quality improvement verification procedures used in their development and implementation.

4. EFFORTS TO IDENTIFY DUPLICATION

As noted in section 2(b) above, the state respondent will need to include a number of separate and unique elements for each plan submittal. For example, each Serious area attainment plan must include a unique BACM/BACT analysis, attainment demonstration, RFP plan and quantitative milestone reports.

However, there are other activities covered by existing ICRs which complement the elements required in the PM_{2.5} plans. For example, the existing PM_{2.5} monitoring network, covered under a separate ICR, provides essential data for use by states and EPA in identifying key categories of emissions and tracking progress toward attainment.

EPA encourages the states to account for control measures and expected emission reductions from existing regulations and implementation planning processes, such as for the the PM_{2.5} NAAQS, the ozone NAAQS, or the regional haze program. Taking such steps, where appropriate, may enable states to reduce the incremental administrative burden associated with this rule and enable identification of control strategies that achieve multi-pollutant environmental progress at a lower cost.

Relevant ICRs and their titles are identified below.

- Requirements for Preparation, Adoption, and Submittal of Implementation Plans
 - o 51.121-51.122 NOx SIP Call.....2060-0445
 - o 51.160-51.166 New Source Review.....2060-0003
 - o 51.321-51.323 Air Quality Data Reporting.....2060-0088
 - o 51.353-51.354 Inspection/Maintenance.....2060-0252
 - o 51.365-51.366 Inspection/Maintenance.....2060-0252
- Approval and Promulgation of Implementation Plans
 - o 52.21 Prevention of Significant Deterioration.....2060-0003

- Ambient Air Monitoring Reference and Equivalent Methods
 - o 53.42080-0005
 - o 53.9(f),(h),(i).....2080-0005
 - o 53.14.....2080-0005
 - o 53.152080-0005
 - o 53.16(a)-(d),(f).....2080-0005
- Outer Continental Shelf Air Regulations
 - o 55.4-55.82060-0249
 - o 55.11-55.142060-0249
- Ambient Air Quality Surveillance
 - o 58.11-58.142060-0084
 - o 58.20-58.232060-0084
 - o 58.25-58.282060-0084
 - o 58.30-58.31.....2060-0084
 - o 58.332060-0084
 - o 58.352060-0084
 - o 58.40-58.412060-0084
 - o 58.432060-0084
 - o 58.452060-0084
 - o 58.502060-0084
- Determining Conformity of Federal Actions to State or Federal Implementation Plans
 - o 91.150-93.1602060-0279
- 8-hour Ozone National Ambient Air Quality Standard Implementation Rule
 - o 2236.02.....2060 - 0594

5. MINIMIZING BURDEN ON SMALL ENTITIES

The PM2.5 NAAQS SIP Requirement Rule does not provide a direct administrative burden on small entities.

6. EFFECTS OF LESS FREQUENT COLLECTION

The collections under this rule (as reviewed in section 2(b)) are necessary to comply with Clean Air Act requirements and provide assurances that identified levels of emission reductions are adequate to ensure timely attainment and maintenance of the PM2.5 NAAQS.

7. GENERAL GUIDELINES

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

This is a renewal of the existing ICR for the PM2.5 SIP Requirements Rule, which is currently approved through January 31, 2024. For the most recent proposal, public comments were

solicited via the Federal Register on August 15, 2023, during a 60-day comment period. No comments were received.

8b. Consultations

In addition to soliciting comments on the proposed PM_{2.5} NAAQS SIP Requirements Rule on March 23, 2015 (80 FR 15339) and the ICR Renewal on October 1, 2019 (84 FR 52104), the EPA regularly consults with state and local air agencies through standing EPA-to-state meetings and monthly EPA, state and local air agency calls. NAAQS implementation updates are a routine agenda item on these calls. Call participants, which typically include well over 20 air agencies, are offered the opportunity to raise questions or offer comments on any agenda or non-agenda items. On July 11, 2023, EPA shared these ICR draft statements to the Association of Air Pollution Control Agencies as part of its regular monthly meeting. On July 26, 2023, EPA shared PM_{2.5} Implementation NAAQS updates, which included this draft ICR effort, to the National Association of Clean Air Agencies on its regular monthly call.

9. PAYMENTS OR GIFTS TO RESPONDENTS

No payments or gifts are provided to respondents.

10. PROVISIONS FOR PROTECTION OF INFORMATION

The information requested from the states to fulfill CAA requirements as described in section 2(b) will rely on emissions levels and control efficiency data provided by certain facilities in the private and public sectors. This information is available from a variety of sources and states should already have information from emission sources, as facilities should have provided this information to meet other NAAQS SIP requirements, operating permits, and/or emissions reporting requirements. It is the assimilation and analysis of that data (e.g., for BACM/BACT control measure determinations, the attainment demonstration, etc.) that is required by the PM_{2.5} NAAQS SIP Requirements Rule.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Questions of a sensitive nature are not included in this information collection.

12. ESTIMATE OF RESPONDENT BURDEN HOURS & LABOR COSTS

12a. Respondents/NAICS Codes

State and local air agencies¹ are the primary respondents under this ICR. Table 1 lists all 12 area or parts of areas that are currently nonattainment for one or more of the PM_{2.5} NAAQS and the

¹ Local, state, and federal agencies are part of the North American Industrial Classification System code number 924110, [which](#) includes “administration of air and water resources, and solid waste management programs.” See http://www.census.gov/naics_

potential submissions that one might reasonably expect from their respective states during the 3-year period covered by this ICR.

Table 1 also includes estimated burden hours for each nonattainment area and an estimated total weighted direct and indirect hourly equivalent salary cost of \$80.35 per hour. For those areas that are expected not to attain by their applicable PM_{2.5} NAAQS attainment date, we estimate 18,000 hours to develop and submit SIP revisions in the form of a new attainment plan. For those areas that will have attained by their applicable attainment dates, we estimate 300 hours for states to develop and submit maintenance plans and requests to redesignate those nonattainment areas back to attainment.

Table 1. Areas Designated Nonattainment for 1997, 2006 and/or 2012 PM_{2.5} NAAQS: Estimated Burden for Meeting PM_{2.5} NAAQS Attainment Plan or Maintenance Plan Requirements During the Period February 1, 2024-January 31, 2027 (Not Present Day Value)

Nonattainment Area for PM _{2.5} NAAQS	State	EPA Region	Potential Actions during ICR period 02/01/2024-01/31/2027	3-year Burden Estimate (Hours)	3-year Burden Estimate (Dollars)
Fairbanks	AK	10	2006 189(d) SIP Revision	18,000	\$1,446,300
West Central Pinal	AZ	9	2006 Maintenance Plan	300	\$24,105
Imperial	CA	9	2006/2012 Maintenance Plan	300	\$24,105
Los Angeles-South Coast Air Basin	CA	9	2006/2012 SIP Revisions; 1997 Maintenance Plan	18,300	\$1,470,405
Plumas County	CA	9	2012 Serious SIP Revision	18,000	\$1,446,300
Sacramento	CA	9	2006 Maintenance Plan	300	\$24,105
San Francisco	CA	9	2006 Maintenance Plan	300	\$24,105
San Joaquin Valley	CA	9	1997/2006/2012 SIP Revisions	18,000	\$1,446,300
Klamath Falls	OR	10	2006 Maintenance Plan	300	\$24,105
Allegheny	PA	3	1997/2006/2012	300	\$24,105

Nonattainment Area for PM _{2.5} NAAQS	State	EPA Region	Potential Actions during ICR period 02/01/2024-01/31/2027	3-year Burden Estimate (Hours)	3-year Burden Estimate (Dollars)
			Maintenance Plan		
Provo	UT	8	2006 Maintenance Plan	300	\$24,105
Salt Lake City	UT	8	2006 Maintenance Plan	300	\$24,105
TOTAL				74,700	\$6,002,145

12b. Information Requested

The information requested, as described in this ICR, is required to meet the requirements of the CAA. The implementation framework set forth in the PM_{2.5} SIP Requirements Rule does not adopt a “one-size-fits all” approach to meeting these requirements. This additional flexibility enables the states to customize, to the extent allowed by the Clean Air Act, their approach to attaining and maintaining the PM_{2.5} NAAQS.

Data Items. The emissions and control efficiency data required for the attainment demonstration, RFP, BACT, BACM, and quantitative milestone reporting are assumed to have been collected as a result of reporting activities required by other OMB approved ICRs. For example, the collection of emissions information for many stationary sources is required under other programs, such as the Air Emissions Reporting Rule (AERR) (see <https://www.epa.gov/air-emissions-inventories/air-emissions-reporting-requirements-aerr>). In developing PM_{2.5} SIPs, air agencies are expected to use a range of other readily available data sources, such as Regulatory Impact Analyses developed for illustrative purposes to support federal rules that are expected to reduce future emissions of particulate matter precursors, and data sources that provide economic and population growth rates.

12c. Respondent Activities

The states will compile and reference air quality and emissions data, establish their analytical methodology, analyze and assess control technology, conduct emissions reduction and air quality modeling analyses, develop initial plan drafts, hold public hearings, adopt rules, regulations, and programs, have discussions with EPA staff as appropriate, refine the draft demonstrations and other plan elements as appropriate, adopt their plans, and formally submit them to the EPA.

The deadlines for implementing the PM_{2.5} NAAQS under subpart 4 are set consistent with CAA requirements. BACM/BACT requirements for Serious area SIPs are due within 18 months of the date an area is reclassified as Serious. For an area reclassified to Serious by operation of law under CAA

section 188(b)(2), a state must submit a new attainment demonstration no later than 18 months after reclassification. For an area reclassified to Serious pursuant to the agency's discretionary authority provided under CAA section 188(b)(1)(B), a state must submit a new attainment demonstration within 18 months after the required date for the State's submission of a SIP for the Moderate area. CAA section 189(d) plan revisions are due within 12 months after the missed Serious area attainment date. Quantitative milestone reports, as required under the CAA, are due every 3 years until the area is redesignated to attainment, no later than 90 days after a milestone date. To receive a redesignation from "nonattainment" to "attainment," a state must submit a maintenance plan with its redesignation request. However, there is no requirement for a state to submit a redesignation request or maintenance plan; such requests are at the state's discretion.

12d. Respondent Hour and Labor Burden

This section provides information on the hours and costs associated with the information collection for the respondents (the affected state and local air agencies) and the EPA (regional and headquarters offices). Hours and costs are presented for the activities associated with each collection item for a nonattainment area (or portion thereof) in a given state, as well as the equivalent annual and present value cost estimates.

Estimating Respondent Burden

The estimated respondent burden represents the estimated staff time associated with the activities required to develop the relevant PM_{2.5} attainment plan or maintenance plan and redesignation request.

The estimated burden in this ICR is incremental to the estimated burden of other EPA environmental reporting obligations. The actual incremental burden is expected to vary across areas for a number of reasons, such as the severity of the nonattainment problem and whether existing federal and state emission reduction programs are projected to attain or maintain the NAAQS.

Remaining Nonattainment Areas for 1997, 2006 and 2012 PM_{2.5} NAAQS

Table 1 provides the list of areas and states that remain nonattainment for one or more of the 1997, 2006 and 2012 PM_{2.5} NAAQS that potentially may need to develop Serious area SIP revisions or CAA section 189(d) SIP revisions, or could qualify for and choose to develop redesignation requests with a maintenance plan during the ICR renewal period. The bulk of the anticipated work for the majority of the nonattainment areas consists of developing maintenance plans. The total estimated burden hours for states that choose to develop and submit maintenance plans and redesignation requests for qualifying areas is 300 hours over 3 years.

However, the Fairbanks, AK; Los Angeles-South Coast, CA; Plumas, CA; and San Joaquin Valley, CA, nonattainment areas may be determined to have missed applicable attainment dates during the ICR period, and could have one or more Serious area CAA section 189(d) SIP revisions due within 12 months of the applicable attainment date (also within the period for this ICR renewal). For the purposes of this analysis, the estimated burden for development of SIP revisions required to address Serious area requirements is 18,000 hours over 3 years.

Table 2 below summarizes the number of collection items (e.g. Serious area attainment plans and redesignation requests) that states may be anticipated to develop, and it provides a 3-year breakdown of expected burden hours by state.

For the purposes of this analysis, the assumed allocation of total incremental burden across the 3 years is divided evenly. Table 2 provides a 3-year breakdown of expected burden hours by state and by year.

Table 2. Nonattainment Areas for 1997, 2006 and 2012 PM_{2.5} NAAQS: Estimated Incremental Burden Hours by State and Year

State	EPA Region	No. of Areas or Parts of Areas	Additional hours Year 1	Additional hours Year 2	Additional hours Year 3
AK	10	1	6,000	6,000	6,000
AZ	9	1	100	100	100
CA	9	6	18,400	18,400	18,400
OR	10	1	100	100	100
PA	3	1	100	100	100
UT	8	2	200	200	200
Total			24,900	24,900	24,900

Estimating Respondent Cost

Labor costs are estimated for state and local governments using the total of projected burden hours for current nonattainment areas for the 1997, 2006, and 2012 PM_{2.5} NAAQS. These estimates do not reflect staff experience or economies of scale. The hourly rates are the result of estimated direct and indirect cost per employee. The main source of the information is <http://www.opm.gov/oca/payrates/index.htm>.

The estimated weighted direct salary cost per employee is \$50.85 per hour. This results from a summation of the professional, managerial, and support staff components.

- Hourly equivalent 2023 salary of permanent professional staff at GS 11, Step 3 is \$41.94 This is the average of hourly equivalent rates for the San Francisco, CA and Washington, D.C. areas.
- To account for permanent managerial staff, 1/11 or 9.1% of the hourly rate for GS 13, Step 3 is added to the professional staff hourly rates. The average hourly equivalent rate for GS-13 using rates for San Francisco, CA and Washington, D.C. is \$59.77, of which 9.1 percent is \$5.43.

- To account for permanent support staff at GS-6, Step 6, 1/8 or 12.5% of the hourly rate is added to the professional staff hourly rates. The average hourly equivalent rate for GS-6, Step 6 using rates for San Francisco, CA and Washington, D.C. is \$27.89, of which 12.5 percent is \$3.49.

The estimated hourly indirect cost per employee is \$29.50. This amount is the sum of the following:

- Benefits at 16% of the weighted direct hourly equivalent salary cost per employee, or \$8.14.
- Sick and annual leave at 10% of the weighted direct hourly equivalent salary cost per employee, or \$5.09.
- General overhead at 32% of the weighed direct hourly equivalent salary cost per employee, or \$16.27.

The estimated total weighted direct and indirect hourly equivalent salary cost per employee is therefore \$80.35 (= \$50.85 + \$29.50, with any differences due to rounding). The estimated annual incremental respondent burden for the state respondents to make the anticipated plan submissions in current year dollars is provided in Table 3.

Table 3. Estimated Annual Incremental Hour and Cost Burden for the States (Respondents) to Fulfill the PM_{2.5} SIP Submittal Requirements (including Optional Maintenance Plans)

No. of Areas or Parts of Areas	Burden for the 3-year ICR period	Annual Cost for Year 1 (Present Value)	Annual Cost for Year 2 (Present Value)	Annual Cost for Year 3 (Present Value)
12	74,700 hours	\$1.76 million	\$1.76 million	\$1.76 million

Estimating the Respondent Universe and Total Burden and Costs

Table 5. PM_{2.5} NAAQS Total Incremental State Universe Burden and Cost Estimates

Entity	Average Yearly Burden (hours)	3-Year Burden (hrs)	Present Value of Costs for 3-Year Burden
States	24,900	74,700	\$5.3 million

Costs for years 2 and 3 are calculated using the equation Present Value = Future Value/ (1 + interest rate)^t, where “t” is the number of years hence (i.e., 0 for year 1, 1 for year 2, 2 for year 3). The adjusted values for years 1, 2, and 3 are then summed.

13. ESTIMATED RESPONDENT ANNUAL NON-LABOR COST (CAPITAL AND O&M)

This collection includes no non-labor costs.

14. AGENCY BURDEN ESTIMATES

The estimated agency burden is derived from the same estimates used for estimating respondent costs in section 6(c).

The respondent burden was summed for each EPA Regional office and a percentage factor was applied to the yearly respondent burden estimate to reflect the burden associated with EPA Regional office activities for each SIP submission. Once yearly burdens were estimated for the Agency's Regional offices, a percentage of those amounts was used to derive estimates for the Agency's headquarters office burden.

Agency Regional Office Burden. The Agency Regional office burden is presumed to be 10% of the estimated total incremental burden for respondents. The total incremental burden allocation for the Agency Regional offices is divided evenly over the 3-year period.

Agency Headquarters Burden. The Regional office burden estimates for years 1, 2, and 3 are multiplied by 10% to arrive at an estimate for headquarters burden for the same 3 years.

Total Incremental Burden for the Agency. The EPA regional and headquarters office burden estimate for each year is 2,739 hours.

Total Annual Cost for the Agency. Using the weighted direct and indirect salary equivalent hour rate derived in section 6(c), the total incremental burden hours are multiplied by that rate for a total annual cost to the Agency of \$193,796 (present value).

Table 4. PM2.5 NAAQS Total Incremental Agency Universe Burden and Cost Estimates

Entity	Average Yearly Burden (hours)	3-Year Burden (hrs)	Present Value of Costs for 3-Year Burden
EPA	2,739	8,217	\$0.58 million

Costs for years 2 and 3 are calculated using the equation $\text{Present Value} = \text{Future Value} / (1 + \text{interest rate})^t$, where "t" is the number of years hence (i.e., 0 for year 1, 1 for year 2, 2 for year 3). The adjusted values for years 1, 2, and 3 are then summed.

15.CHANGE IN BURDEN

The current ICR that is set to expire January 31, 2024 estimated a burden of 76,500 total labor hours at an annual labor cost of \$1.6 million (present value) over three years for 18 area responses (8 states). For this revision, EPA is estimating 74,700 total labor hours at an annual labor cost of \$1.76 million (present value) over three years for 12 area responses (6 states). The decrease in total state respondent labor hours is due to the reduction in nonattainment areas from 18 to 12. While the hours decreased due to the fewer number of respondents, there is an increase in estimated costs due to the increase in labor rates and the need for several areas to continue to develop plans to help address complex air quality issues. The estimates in this renewal have been calculated using 2023 dollars and some

assumptions regarding overhead, O&M costs, and capital costs have been adjusted to meet current guidelines and common procedures for preparing ICRs.

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.