

U.S. Environmental Protection Agency

Information Collection Request

Title: NO_x SIP Call (Renewal)

OMB Control Number: 2060-0445

EPA ICR Number: 1857.13

Abstract:

This is a renewal of the Environmental Protection Agency's (EPA's) information collection request (ICR) addressing the burden and costs of information collection activities indirectly required under the NO_x SIP Call (the Rule). The Rule requires affected states to include certain provisions in their state implementation plans (SIPs) addressing emissions of nitrogen oxides (NO_x) that adversely affect air quality in other states. Previously, one of the Rule's requirements applicable to all affected states was that the SIPs must include provisions requiring large electricity generating units (EGUs) and large non-EGU boilers and turbines to monitor and report their NO_x mass emissions during the May-September ozone season according to the provisions of 40 CFR part 75 (referred to here as Part 75 monitoring requirements). In 2019, EPA amended the NO_x SIP Call making the inclusion of Part 75 monitoring requirements in SIPs voluntary instead of mandatory, allowing states to submit SIP revisions to EPA requiring sources to perform other forms of monitoring. Although the Rule does not impose any requirements directly on sources, the Part 75 monitoring requirements were added to SIPs because of the Rule, and EPA has therefore submitted and periodically renewed an ICR to account for the information collection burden and costs of the Part 75 monitoring requirements imposed indirectly on sources. This ICR includes estimates of burden and costs both for sources subject to Part 75 monitoring requirements and sources performing other forms of monitoring for NO_x SIP Call purposes under approved SIP revisions.

Most large EGUs (and some large non-EGU boilers and turbines) affected under the NO_x SIP Call are also subject to comparable Part 75 monitoring requirements under the Acid Rain Program (ARP) and/or the Cross-State Air Pollution Rule (CSAPR) trading programs. Both the ARP and CSAPR have approved ICRs (OMB Control Nos. 2060-0258 and 2060-0667), and this ICR accounts for information collection burden and costs only for sources that are not required to perform Part 75 monitoring under the ARP or CSAPR programs and whose information collection burden and costs therefore are not accounted for in the ARP ICR or the CSAPR ICR. This ICR also accounts for information collection burden and costs for additional sources – primarily smaller EGUs – that states voluntarily have made subject to Part 75 monitoring requirements under the SIPs they adopted for NO_x SIP Call compliance, going beyond the Rule's existing requirements.

Under the NO_x SIP Call, states are required to report certain data regarding emissions of sources in the state to EPA on an annual or triennial basis. The Air Emission Reporting Rule (AERR) for the national emission inventory includes very similar reporting requirements, and EPA believes that there is no material incremental information collection burden and cost associated with the required state

reporting for NO_x SIP Call purposes beyond the burden and cost estimates included in the AERR ICR (OMB Control Number 2060-0580). Thus, the only information collection burden and costs addressed in this ICR relate to the monitoring and reporting requirements imposed on sources through the states' SIPs for compliance with the NO_x SIP Call.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The state reporting requirements included in the NO_x SIP Call are necessary for EPA to carry out properly its evaluation of each state's compliance with its ozone season NO_x emissions budget. The legal authority for the reporting requirements resides in Clean Air Act (CAA) sections 110(a) and 301(a). Specifically, the requirement in section 110(a)(2)(D) that SIPs include "adequate provisions" to mitigate certain transport effects on other states implicitly authorizes emissions inventory reporting to EPA, as needed and appropriate to verify that a state is in fact meeting its NO_x budget. Section 110(a)(2)(F) provides additional authority for requiring that SIP call submissions include provisions for emissions reporting by sources to a state, correlation of source information by the state, and steps by the state to make the correlated information available to the public. Section 110(a)(2)(K), in turn, requires a state to submit to EPA as requested data related to modeling the effect of NO_x and other emissions on ambient air quality. The reported emissions inventory data is used by EPA in air quality modeling to assess the effectiveness of the transport rulemaking's regional strategy. Finally, CAA section 301(a) grants EPA broad authority to prescribe such regulations as are necessary to carry out its functions under the Clean Air Act.

Under the 2019 amendments, the NO_x SIP Call regulations do not establish a mandatory form of monitoring that states have to include in their SIPs to obtain the data required to be reported to EPA. Rather, under 40 CFR 51.121(f)(1) and (i)(1), which repeat certain general requirements applicable to all SIPs under 40 CFR 51.111, 51.210, and 51.211, states simply have to ensure that monitoring is sufficient to allow the state to ensure that the control measures in the SIP are being complied with. Any Part 75 monitoring requirements imposed on sources in SIPs are pursuant to state determinations rather than EPA requirements.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

EPA believes it is essential that compliance with the regional control strategy be verified. Tracking emissions is the principal mechanism to ensure compliance with the budget and to assure the downwind affected states and EPA that the ozone transport problem is being mitigated. The information collected by the industry sources subject to this ICR provides necessary input data to the state emissions inventory needed for tracking regional control strategy compliance.

Further, the emissions reductions attributable to the NO_x SIP Call have been relied on to support numerous final actions redesignating areas to attainment of national ambient air quality standards (NAAQS). Under CAA section 107(d)(3)(E), emissions reductions that are relied on to support redesignation actions must be “permanent and enforceable.” Continued collection of emissions data is necessary to ensure that the emissions reductions are permanent and enforceable and can therefore continue to be used to support other EPA actions.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Several computer systems and associated databases have been developed to record quarterly emissions monitoring data under Part 75. The systems and databases are designed to coordinate the information for easy access and use by the Agency, states, regulated community, and the public. The Emissions Collection and Monitoring Plan System (ECMPS) is where sources are able to submit required quarterly monitoring data. EPA provides access to the emissions data in both detailed and summary formats on the Clean Air Markets Program Data (CAMPD) website, which is accessible to sources and the public. The CAMD Business System (CBS) is used by sources and the Agency to appoint facility representatives and update facility information.

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

To minimize the reporting burden on state agencies, the state reporting requirements under the NO_x SIP Call are integrated with the annual and periodic emission inventory reporting requirements under the Air Emissions Reporting Rule.

Almost all information collected from emissions sources under this ICR renewal is not otherwise available. All reporting formats for affected sources required to monitor under Part 75 for any program, such as the Acid Rain Program or CSAPR, are fully integrated across programs. For a unit subject to more than one of these programs, a single quarterly submission is used to satisfy the quarterly reporting requirements for all programs. Where a source monitors under Part 75, the Part 75 monitoring generally also satisfies the monitoring requirements that apply under other federal programs that do not themselves require Part 75 monitoring, such as new source performance standards.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

In the NO_x SIP Call rulemaking, 63 FR 57356 (October 27, 1998), the Administrator certified that the rule will not have a significant economic impact on a substantial number of small entities.

The low mass emissions provisions under 40 CFR 75.19 provide for optional reduced monitoring, quality assurance, and reporting requirements for certain units that combust natural gas and/or fuel oil. Such units must emit no more than 100 tons of NO_x annually, 50 tons of NO_x during the May-September ozone season, and 25 tons of SO₂ annually, and must calculate no more than these same amounts based on specified procedures for calculating and reporting emissions. Units that qualify are exempted from certain requirements to install and operate monitoring equipment, conduct fuel sampling, and perform quality assurance or quality control tests. Moreover, emissions reporting requirements are significantly simplified for these units.

Gas- or oil-fired units that do not qualify for the low mass emissions unit provisions under 40 CFR part 75 may still meet criteria that allow for the use of alternative methods to measure emissions. As discussed in the Regulatory Impact Analysis of the final ARP regulations (October 19, 1992), smaller utilities are more likely to be dependent on these oil- and gas-fired units, especially very small utilities.

As noted, in 2019 the NO_x SIP Call was amended to allow states the option of making the Part 75 monitoring and reporting requirements optional for affected sources. This provides sources in states that elect to implement the revision, an option to follow a potentially less burdensome monitoring and reporting strategy.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Quarterly collection of emissions data for the affected units allows the opportunity to check data for errors and provide rapid feedback on needed adjustments to data collection systems, and thereby promoted accurate and reliable emissions data. For this same reason, existing federal and state emission monitoring programs often require quarterly reporting, or in some cases, monthly. Less frequent collection, such as semi-annually or annually, would increase the amount of preparation and review time at the end of the reporting period both for regulated sources and for EPA. This would slow down the process for the verification of compliance.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

This ICR does not violate any of OMB's guidelines for information collections.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

The EPA published the proposed ICR in the Federal Register on 9/5/2024 (FRL-12191-01-OAR). The EPA did not receive any comments.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

EPA has held numerous consultations on Part 75 monitoring requirements during the development of the ARP, the NO_x SIP Call, the Clean Air Interstate Rule, and CSAPR.

For the initial development of the NO_x SIP Call, on January 13, 1998, EPA held a one-day pre-proposal workshop with the states to discuss tracking issues. The objective of the workshop was to determine what type and frequency of inventory reporting is feasible for the different source sectors (power generating sources, other point sources, area sources, non-road mobile, and highway mobile sources), to identify key reporting issues related to each sector, and to develop recommendations on reporting requirements to ensure compliance with the NO_x budgets. The goal was to share information and ideas rather than to reach consensus. A summary of the meeting is contained in the docket (docket no. A-96-56, item V-B-18) for the NO_x SIP Call rulemaking. The reporting requirements included in 40 CFR 51.122 are based, in part, on the suggestions of participants in the workshop.

The state recordkeeping and reporting requirements under the NO_x SIP Call were included in the supplemental proposal (63 FR 25902, May 11, 1998) on which public comments were solicited. Comments received were reviewed and where appropriate were incorporated into the rule requirements.

Finally, as part of updating the ICRs for the Acid Rain Program, CSAPR Update, and NO_x SIP, EPA reached out in July of 2024 to a representative sample of affected sources who are subject to the Acid Rain Program's requirements. The sources were asked for their voluntary input regarding estimated labor hours and costs associated with various tasks related to emissions monitoring and data submissions under the Acid Rain Program, which encompasses the CSAPR Update and NO_x SIP program requirements. After receiving responses, the EPA re-evaluated the burden hours for specific tasks and

capital and O&M costs incurred under the program. The responses received were in line with the data in the previous ICRs and thus the data remained largely the same as the data previously collected.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Respondents will not receive payments or gifts.

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

As required by CAA section 114, estimates or measurements of emissions must be treated as non-confidential. Under Agency procedures, data items relating to the computation of emissions may be identified as sensitive by a state and are then treated as "state-sensitive" by EPA. The potentially state-sensitive items include the process rate, boiler design capacity, emission estimation codes, percent space heat, operating rate, and maximum operation rate/hour. Where federal and state requirements are inconsistent, the appropriate EPA Regional Office should be consulted.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*

- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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12a. Respondents/NAICS Codes

This ICR estimates the burden for sources affected under the NO_x SIP Call that are not subject to Part 75 monitoring requirements under another program (i.e., the Acid Rain Program or a CSAPR trading program) to monitor NO_x mass emissions so that states and EPA can track compliance with state emission budgets and NO_x control measures for NO_x SIP Call purposes. The affected sources are generally fossil fuel-fired boilers and stationary combustion turbines that have heat input capacities greater than 250 million BTU per hour or that serve electricity generators with nameplate capacities greater than 25 megawatts. Sources meeting these criteria operate in a variety of industries, including:

- Fossil fuel-fired electric power generation, North American Industry Classification System (NAICS) 221112.
- Grain and oilseed milling, NAICS 3112.
- Pulp, paper, and paperboard mills, NAICS 3221.
- Petroleum and coal products manufacturing, NAICS 3421.
- Basic chemical manufacturing, NAICS 3251.
- Iron and steel mills and ferroalloy manufacturing, NAICS 3311.
- Colleges, universities, and professional schools, NAICS 6113.

Some states have also adopted SIP provisions making additional units subject to Part 75 requirements for NO_x SIP Call purposes although not required to do so. Most of these sources are combustion turbines serving electricity generators with nameplate capacities between 15 and 25 megawatts.

12b. Information Requested

This section describes the industry reporting requirements needed to enable state agencies to meet their reporting and recordkeeping requirements under the NO_x SIP Call in cases where the states choose to require that the information be monitored and reported directly to EPA in accordance with Part 75.

1) Information Requested

a) Data Items, Including Recordkeeping Requirements

- i) The affected units must monitor NO_x mass emissions and record and report emissions data using the requirements of 40 CFR Part 75. In general, the emissions monitoring requirements specify that affected sources must: (1) submit a monitoring plan for each affected unit at a source; (2) submit data for certification of each monitor; (3) record hourly operational, pollutant monitor, and flow monitor data for each affected unit and (4) submit quarterly reports of their emissions data to EPA. The Acid Rain Program ICR (OMB Control Number 2060-0258) contains links to a list of the data items required by the recordkeeping and reporting provisions of Part 75.
- ii) Respondents are required by 40 CFR 75.64 to submit the quarterly NO_x mass emissions data to EPA electronically and must include a certification statement by the designated

representative of the unit. All monitoring records are to be kept for three years, with one possible exception under a voluntary option for fuel flowmeter calibration testing.

2) Collection Schedule

- a) Affected units conduct ongoing monitoring, with quarterly reporting.

12c. Respondent Activities

The affected units must (1) complete and submit appropriate monitoring plan forms for each affected source and each affected unit at a source; (2) conduct tests to certify the operation of monitors and submit test results to EPA; (3) record hourly emissions data (this activity generally is performed electronically); (4) conduct operation and maintenance activities associated with the monitoring, including quality assurance activities; (5) assure data quality, prepare quarterly reports of emissions data and submit these reports to EPA; and (6) respond to error messages generated by EPA. In addition, respondents must purchase the necessary monitoring hardware and electronic data reporting software (or software upgrades).

12d. Respondent Burden Hours and Labor Costs

1) Estimating Respondent Burden

The primary tasks performed by owners and operators of affected units are: (1) reviewing the regulations, forms and instructions; (2) responding to EPA generated error messages and audits; (3) programming a data acquisition and handling system (DAHS) and debugging the software; (4) completing and submitting monitoring plans for each unit at the source; (5) performing appropriate tests and providing test results to certify each monitor; (6) performing quality assurance testing and maintenance upon monitors; and (7) assuring the quality of emissions data, preparing quarterly reports of emissions data, and submitting reports to EPA.

a. Regulatory Review

- i. The estimate for time to review instructions and requirements remains consistent with the labor estimates used in previous ICRs (four manager hours and four technician hours each year) where no substantial changes have been made to the Rule

b. Response to Error Messages/Audits

- i. EPA provides feedback to sources so that suspected errors in submissions by sources are noted and corrected. The Agency estimates that for each unit, an owner or operator will spend approximately six hours of managerial time and eighteen hours of technician time responding to these error messages each year.

c. DAHS Debugging

- i. Each source must purchase (or create) and install computer software designed to implement the electronic data reporting formats required under Part 75. For the years covered by this ICR renewal, EPA estimates that for each unit, four

managerial and 12 technician hours will be required annually for occasional further debugging.

d. Monitoring Plans

- i. Consistent with the existing ICR, completing and submitting initial monitoring plans is estimated to require an average of about 20 hours per unit. EPA shows a separate line item for initial monitoring plan preparation for new units, estimated as 10% of the number of existing units. (EPA assumes that any new units would be offset by an equal number of retirements.)
- ii. For existing units, the burden associated with revising the monitoring plan is included in the time for preparing and submitting each quarterly emissions report.

e. Monitor Certification

- i. Initial certification burdens and costs for new monitoring equipment are considered part of start-up activities since these costs are often part of the overall purchase expense for the equipment. Sources occasionally experience burdens for recertification to the extent a change in a monitoring system requires recertification. Based on the previous ICRs, EPA estimates that approximately ten percent of units will have to recertify each year following the year in which the initial certification occurs. The ICR incorporates a labor burden estimate generally consistent with existing Agency models for the labor burdens associated with certification. However, note that the ICR reduces the labor hours for this activity to avoid double-counting hours that are already accounted for in the quality assurance activity area (see the following subsection). The double-counting would occur because a portion of the labor incurred for the certification or recertification event replaces the labor burden that is generally allocated to the annual relative accuracy test audit (RATA) in the year in which the certification event occurs.

f. Quality Assurance

- i. Quality assurance (QA) activities and other routine maintenance for monitoring systems is the largest burden item under the CSAPR and Texas trading programs. These requirements generally include daily, quarterly, and annual QA requirements, depending on the monitoring approach being used. For reporting units that use a CEMS, the Agency has assumed a per unit labor burden based on a variety of sources, including the existing ARP ICR, information provided by sources, a CEM cost model developed by EPA, and comments submitted in response to the NO_x SIP Call. For units that rely on alternative methodologies, reduced labor burden estimates apply because the quality assurance activities for the excepted methods are less than for a CEMS. Consistent with the existing ARP ICR, the labor burden is expected to be almost entirely technician labor.

g. Quarterly Reports

- i. Tasks performed by utilities in preparing quarterly reports include: (1) assuring the quality of the data; (2) preparing the quarterly report; (3) revising the monitoring plan, if necessary; (4) preparation of hard copy documentation

accompanying the quarterly reports; and (5) managerial review. The existing ARP ICR was used as the basis for these estimates.

2) Estimating Respondent Labor Costs

In estimating labor costs for industry, EPA used the following amounts: \$123.48 per hour for managers and \$88.80 per hour for technicians. These rates were updated in coordination with the rates identified for the Acid Rain ICR (OMB Control No. 2060-0258) and are based on the Current Employment Cost Index, 2024.

3) Estimating the Respondent Universe and Total Burden and Costs for Affected Units

Based on the most recent reporting period, EPA estimates there will be 376 affected units that will continue to conduct monitoring in accordance with Part 75 solely under the NO_x SIP Call during the time period covered by this ICR renewal. Additionally, EPA estimates that 5 affected units will use other forms of monitoring under the NO_x SIP Call. For the purposes of estimating the information collection burden and costs for the non-part 75 units, EPA has assumed that the alternative monitoring methodologies used by non-part 75 units have similar burden and costs as the low mass emissions (LME) monitoring method under part 75.

Table 12.1 shows the total burden and total cost for this respondent universe.

Table 12.1: Annual Respondent Burden/Cost Estimates for Affected Units

Information collection activity	Mgr. \$123.48/ hour	Tech. \$88.80/ hour	Respondent hours/year	Labor cost/year	Number of respondents	Total hours/ year	Total cost/year
1. Review instructions and requirements	4	4	8	\$849	136	1,088	\$115,464
2. Respond to EPA-generated error messages, field audits	6	18	24	\$2,339	376	9,024	\$879,464
3. DAHS debugging	4	12	16	\$1,560	376	6,016	\$586,560
4. New unit monitoring plans	10	10	20	\$2,123	4	80	\$8,492
5. Recertify monitors	38	12	50	\$5,758	76	3,800	\$437,608
6. Startup/capital items and perform QA testing and maintenance							
(a) NO _x and flow CEMS	50	480	530	\$48,798	61	32,330	\$2,976,678
(b) NO _x CEM and fuel flowmeter	20	375	395	\$35,770	160	63,200	\$5,723,200
(c) App. E and fuel flowmeter	5	30	35	\$3,281	10	350	\$32,810

(d) LME	4	12	16	\$1,560	145	2,320	\$226,200
(e) Non-part 75	4	12	16	\$1,560	5	80	\$7,800
7. Assure data quality, prepare reports (incl. monitoring plan update), submit reports ^a	20	82	102	\$9,751	376	38,352	\$3,666,376
TOTAL:						156,640	\$14,660,652

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

1) Estimating Total Capital and Annual Operations and Maintenance Costs

Capital/start-up costs include the cost of installing required CEMS or alternatives. Operation and maintenance costs (exclusive of labor costs) reflect ongoing costs to a unit and include both contractor costs for the required recertification, diagnostic, and quality assurance (QA) testing, and other direct maintenance-related expenses (e.g., spare parts and calibration gases). These cost estimates have been derived from EPA CEM cost models, existing ICRs, Agency staff experience under the ARP, NOX SIP Call, CAIR, and CSAPR programs, and supplemental estimates provided by affected utilities and others related to the various cost items. These costs are assumed to include incremental calibration gas costs consistent with the former ICR for the Protocol Gas Verification Program (OMB Control Number 2060-0626).

Note that testing contractor costs for certification, recertification and annual relative accuracy test audits (RATAs) are presented as other direct costs and are not converted to equivalent source labor hours. This approach is consistent with the common business practice of obtaining outside contractors to conduct certification/recertification tests and annual RATAs. For initial certification, the certification test costs are commonly bundled with equipment purchase contracts, according to information provided by a range of CEMS equipment vendors. For RATAs that are conducted either as part of the annual quality assurance requirements or as part of recertification, industry contacts have indicated that RATA testing is usually performed under a fixed price contract basis, except for travel costs that may be billed on an hourly basis beyond the basic contract cost.

As noted above, this ICR includes ongoing annualized start-up/capital costs as well as ongoing O&M costs for any monitoring equipment needed by the unit to meet the applicable monitoring and reporting requirements, regardless of when the equipment was initially installed.

2) Capital/Start-up vs. Operating and Maintenance (O & M) Costs

Capital costs reflect one-time costs for purchase of equipment which will be used over a period of years. Conversely, operating and maintenance costs are those costs which are incurred on an annual or other scheduled basis. For instance, costs associated with quality assurance activities, such as spare parts or contractor costs for work, will be incurred on an annual basis.

3) Summary of Burden Hours and Costs

Table 13.1 summarizes the annual capital and O&M costs for respondents.

Table 13.1: Aggregate Annual Respondent Capital and O&M Costs

Information collection activity	Cont./ O&M cost	Capital/ startup cost	Number of respondents	Total cost/year
1. Recertify monitors	\$3,482	\$0	76	\$264,632
2. Startup/capital items and perform QA testing and maintenance				
(a) NO _x and flow CEMS	\$31,949	\$30,282	61	\$3,796,091
(b) NO _x CEM and fuel flowmeter	\$17,818	\$19,661	160	\$5,996,640
(c) App. E and fuel flowmeter	\$1,843	\$2,359	10	\$42,020
(d) LME	\$1,991		145	\$288,695
(e) Non-part 75	\$1,991		5	\$9,955
TOTAL:				\$10,398,033

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

- 1) Agency Activities
 - a. The tasks that are performed by EPA include processing, reviewing, and evaluating emissions data reports submitted by the affected units, and conducting appropriate audit activities to verify the information provided.
- 2) Collection Methodology and Management
 - a. Several computer systems and associated databases have been developed to record quarterly emissions monitoring data under Part 75. The systems and databases are designed to coordinate the information for easy access and use by the Agency, states, regulated community, and the public. EPA provides access to the emissions data in both detailed and summary formats on the Clean Air Markets Division website.

14b. Agency Labor Cost

The tasks that will be performed by EPA include processing, reviewing, and evaluating emissions data reports submitted by the affected units, and conducting appropriate audit activities to verify the information provided. Assuming that 376 affected units will submit 1,182 quarterly emission reports to EPA each year, the total annual burden incurred by the Agency will be 1,182hours. (The estimated annual total of 1,182 quarterly emissions reports is based on an assumption that 215 units will submit reports for all four quarters each year and 161units will submit reports only for the two quarters each year that encompass the May-September ozone season.) The total annual cost to EPA for processing, reviewing, and evaluating these quarterly emissions reports will be approximately \$111,687.

Federal agency labor rates were assumed to be \$94.49 per hour. This labor rate was derived from the federal government's 2024 U.S. Office of Personnel Management General Schedule "Salary Table 2024-GS" (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS.pdf>) using the factors in the following table.

Table 14.1: Determination of Federal Wage Rates

Labor Category	Factors	Total
Annual salary of technical staff, GS 13, Step 8		\$109,177
Annual cost of supervisory staff, GS 15, Step 8	\$151,748	
Factor (1/11)	0.09	

		\$13,657
Benefits	1.6	
Total cost per FTE		\$196,534.91
Total hourly cost (total cost per FTE divided by 2,080 hours per year)		\$94.49

^a 2024 dollars.

Table 14.2: Annual Agency Burden/Cost Estimates

Tasks	Hours per report	Cost per report ^a	Number of reports ^b	Total burden per year (hours)	Total cost
Process, review, and evaluate quarterly report and issue feedback letter.	1	\$94.49	1,182	1,182	\$111,687

^a Based on an average total compensation rate of **\$94.49** per hour.

^b Based on an assumption of 215 annual reporting and 161 ozone season only reporting facilities.

14c. Agency Non-Labor Costs

The EPA operates and maintains a data system for the electronic submission of emissions data and monitoring plans. EPA incurs annual operation and maintenance (O&M) costs for running the system that consists of multiple applications and databases and requires regular maintenance and system enhancements. The system manages these tasks related to the Acid Rain and the NO_x SIP call. The system O&M costs are accounted for in the Acid Rain Program ICR, and no further non-labor agency costs are relevant for this ICR.

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

This ICR renewal shows an increase in industry burden of 16,414 hours and an increase in industry annualized total costs of \$4,436,079. The total burden and cost have increased primarily due to changes in the estimated numbers of respondents relative to the previous ICR renewal. For purposes of this ICR renewal, EPA has based the estimated numbers of sources using non-part 75 monitoring and reporting methodologies for NO_x SIP Call purposes on updated information about the actual numbers of such sources.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data from sources regarding emissions, allowances, compliance, and facility information will be published on the Clean Air Markets Program Data (CAMPD) site. Data is published automatically to CAMPD. Allowance transfer data is published daily, emissions data is published quarterly, and compliance data is published yearly.

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

N/A – Expiration date may be displayed.

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

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

