

U.S. Environmental Protection Agency

Information Collection Request

Title: Distribution of Off-Site Consequence Analysis Information under Section 112(r)(7)(H) of the Clean Air Act (CAA), As Amended

OMB Control Number: 2050-0172

EPA ICR Number: 1981.09

Abstract: This ICR renewal is for the Accidental Release Prevention Requirements; Risk Management Programs Under the Clean Air Act Section 112(r)(7); Distribution of Off-Site Consequence Analysis Information final rule. CAA section 112(r)(7) requires EPA to promulgate reasonable regulations and appropriate guidance to provide for the prevention and detection of accidental releases and for responses to such releases. The regulations include requirements for submitting a risk management plan (RMP) to EPA. The RMP includes information on off-site consequence analysis (OCA) as well as other elements of the Risk Management Program. This ICR renews the collection activity previously approved under ICR OMB Control No. 2050-0172, which will expire on November 30, 2025.

On August 5, 1999, the President signed the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISFRRRA), which required the President to promulgate regulations on the distribution of OCA information (CAA section 112(r)(7)(H)(ii)) to the public. The President delegated to EPA and the Department of Justice (DOJ) the responsibility to promulgate regulations to govern public dissemination of OCA information.

The final rule was published on August 8, 2000 (65 FR 48108) and imposed minimal information collection and record keeping requirements. The Federal government established 55 reading rooms at Federal facilities geographically distributed across the United States and its territories. At a reading room the public can read, but not mechanically copy or remove, paper copies of OCA information for up to 10 stationary sources per calendar month. The public also has access to OCA information that the Local Emergency Planning Committee (LEPC) in the requestor's local area (where the individual lives or works), is authorized to provide. State agencies are permitted to provide the same public access to paper copies of OCA information that a person would receive at their local agency.

EPA also established a Vulnerable Zone Indicator System (VZIS) which indicates whether an address in any state is within the vulnerable zone of one or more stationary sources, according to the data reported in RMPs. The VZIS is available on the internet, which is the method used by all requestors of the data.

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.

This information collection is authorized under the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISSFRRRA). Individuals wishing to view OCA information at Federal reading rooms provide a signature and certification stating that they have not received access to OCA information for more than 10 stationary sources during that calendar month. The Federal reading room staff checks photo identification of the requestor and views documentation demonstrating where the requestor lives (for those who are requesting OCA information on local stationary sources at Federal reading rooms). Individuals who contact the central office will be asked for their name, telephone number, residential address, and names of the stationary sources for which they wish to view the OCA information. This ICR also covers the collection of written requests from State and local officials for OCA information. In addition, the ICR governs the maintenance and disclosure of the OCA information by State and local entities for public use, as authorized and encouraged by CSISSFRRRA and codified in 40 CFR Part 1400.

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.

The information collected from the public under this ICR assures compliance with the requirement to provide public access to paper copies of off-site consequence analysis information (40 CFR 1400.3) for no more than 10 stationary sources in a calendar month.

The requirement that individuals show photo identification and residence documentation to the Federal reading room staff prior to obtaining OCA information significantly reduces the risk that individuals will attempt to use fraudulent identification and assures that they will be provided with only the OCA information to which they are entitled.

The requirement that requestors provide their name, telephone number, and the names of the stationary sources for which OCA information is being requested when calling the central office to schedule an appointment at a reading room enables the staff to relay the requested copies of OCA information to that reading room, and, if necessary, contact the requestor.

This information collection also covers the letters of request sent by State and local agencies for OCA information either for their own use, e.g., emergency planning, and/or provide read-only access to the public. State and local officials who request OCA information for their official use must send a request on their official letterhead to EPA certifying that they are covered persons under P.L. 106-40 and that they will use the information for official purposes only.

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.

There is no opportunity for electronic submission of information from the public. Members of the public who wish to view an RMP OCA report must go in person to a reading room and sign in with the required 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.

The information collected under this ICR includes signatures, certifications, personal identification data, and names of the stationary sources included in the OCA data request. EPA also collects letters from State or local officials requesting OCA information. This information collection does not duplicate any other Federal collection because it is specific to this rule and necessary to ensure that the rule can be implemented.

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.

The rule does not require small entities, such as local emergency planning committees or related local government agencies, to provide public access to OCA information; hence, no special requirements are needed for small entities.

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.

This section is not applicable. The only data being collected are the signatures and self-certification at the time of the reading room visit.

7. GENERAL GUIDELINES

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

The regulations implementing the RMP [Section 112(r) of the 1990 CAA Act amendments; 40 CFR part 68] adhere fully to OMB's general guidelines concerning the collection of information and the control of paperwork burdens on the public. There are no special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

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.

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), the Agency has notified the public about this ICR renewal through the Federal Register notice on April 17, 2025 (90 FR 16125). No comments were received during the 60-day comment period.

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.

During the previous ICR renewal, EPA obtained information and burden estimates from seven EPA Regions (Regions 1,3, 4, 6, 7, 8 and 9) and the EPA HQ Docket Center. As a result of the consultation effort, EPA made changes to selected burden estimates. However, most of the changes were in the direction of reductions in burden from the previous ICR. EPA has no reason to expect that burden estimates will reverse direction and increase during this three-year renewal period. If there is any future change, it most likely will be in the direction of further decreases, both due to the increased use of the Right to Know website (<https://j4502-fs18.github.io/Right-to-Know/rmp.html>), and the continuing trend of decreasing numbers of visits even prior to COVID-19 restrictions, which have since been lifted.

For the previous ICR renewal, EPA also contacted selected State and local agencies that receive OCA data to determine how many members of the public visited a reading room over the ICR period prior to that previous renewal. Given the total number of State and local agencies (52 State offices and 3,000 LEPCs), the number of visits for read-only access to OCA data was very low in the that ICR period, and with the establishment of the Right to Know website, <https://j4502-fs18.github.io/Right-to-Know/rmp.html>, reading room visits were expected to continue to become largely unnecessary. Of the several State and local agencies EPA contacted, none had recorded even a single reading room visit. To err on the conservative side, EPA assumed five reading room visits annually to all State and local agency reading rooms (15 for three years) for the previous renewal and is maintaining that estimate for this renewal.

Most OCA reading room visits occur at the reading room operated by EPA Headquarters in Washington, DC. During the previous ICR period of 2022-2024, the number of reading room visits was 36, or 12 per year. Based on information received from the State and local reading rooms in the previous ICR and EPA Headquarters for the past three years, EPA assumes 12 reading room visits to the EPA Headquarters Reading Room each year, or 36 visits for the three-year ICR period, and five visits to State and local reading rooms annually. The combined estimated total is 17 visits annually over the next three years, or a total of 51 visits for the three-year ICR renewal period.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payments or gifts were made to respondents.

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 systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The information collection requested under these regulations complies with the Privacy Act of 1974 and OMB Circular A-108. The signatures and self-certifications collected are not confidential information.

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.

There are no sensitive questions in this information collection.

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

The respondent universe for this rule includes 385 total State and local agencies (NAICS code 92111) and members of the public. The total includes 38 State and local agencies which send letters of request for OCA data, five States that experience reading room visits, and three LEPCs which hold five public meetings; the public component of the total includes 17 individuals who visit Federal and State reading rooms and 322 individuals who request vulnerable zone indicator system (VZIS) data. The three LEPCs which hold public meetings are assumed to be the same three LEPCs which send letters of request for OCA data. All other respondents are assumed to be unique. Other than the updated number of individuals estimated to visit Federal and State reading rooms annually (increased from 15 in the previous ICR renewal), the numbers of requests for VZIS data and the three LEPCs are assumed unchanged from the previous ICR.

12b. Information Requested

Most reading rooms can be visited by appointment only; only a few are walk-in. Members of the public are required to provide their name, telephone number, and the names of the stationary sources for which OCA information is being requested when they contact the central office to schedule an appointment to view OCA information. They are required to sign-in at the reading room and self-certify

that they have not viewed OCA information for more than 10 stationary sources during that calendar month. Individuals wishing to view OCA information that their LEPC is authorized to provide will also be asked to sign-in and display documentation demonstrating that they live or work in that LEPC's jurisdiction.

State and local agencies requesting OCA information are required to send a written request to EPA on their official letterhead certifying that they are covered persons under P. L. 106-40 and that they will use the information for official purposes only.

12c. Respondent Activities

For the public:

- Call the central office to make an appointment at a reading room and provide their name, phone number, and the names of the stationary sources for which OCA information is requested.
- Display a photo identification at reading rooms and proof of place of residence or employment.
- Sign-in and certify that they have not viewed OCA information for more than 10 stationary sources during that calendar month.
- Submit a request for information from the VZIS by internet.
- Make follow-up calls or contacts to obtain additional information on stationary sources that may affect them.

For State and local agencies:

- Read and understand the Security Notice to Federal, State, and local officials and researchers.
- Submit a written request to EPA for access to OCA information.
- Provide a location for the public to review OCA information for local stationary sources.
- Ensure that members of the public do not remove or copy OCA information they review.
- Make OCA information available other than Sections 2 through 5 of the RMP.

Local agencies are not required to ask the members of the public to show any documentation to gain access to the information. State agencies must verify that a person seeking information for an area lives or works in the area.

Information is not collected at any specified frequency. The information collection at the Federal reading rooms occurs only when an individual requests OCA information.

12d. Respondent Burden Hours and Labor Costs

Public (Individuals)

Labor Burden

EPA estimates that each member of the public spends approximately one hour to sign-in and certify; call the central office to give his/her name, address, telephone number; provide the names of the stationary sources for which OCA information is requested; display documentation demonstrating proof of residence and employment; and view OCA information for local facilities at a Federal reading room. Based on the information EPA collected for the last three years, EPA assumes that 12 individuals will visit the Federal reading rooms annually in the three years covered by this ICR. State and local agency reading rooms contacted by EPA for the two previous ICR renewals reported not a single visit to a

reading room from a member of the public. EPA erred on the conservative side and assumed five public visitors to State and local reading rooms annually in the previous ICR renewal. EPA is maintaining that assumption for this ICR renewal. Therefore, 17 individuals are assumed to visit Federal, State, and local reading rooms annually. See Appendix A in EPA ICR No. 1981.08, OMB Control Number 2050-0172, for details on information EPA obtained from seven EPA Regions (Regions 1,3, 4, 6, 7, 8 and 9) and the EPA HQ Docket Center for the previous renewal.

Additionally, EPA assumes that the public will use the VZIS. EPA estimates that the Agency will receive approximately 322 VZIS inquiries from the public for each year covered by this ICR. EPA estimates that an individual will spend approximately one hour to submit a request for the VZIS. Exhibit 1 shows the total burden to the public for signing in at the reading room (17 hours) and making VZIS inquiries (322 hours) is estimated to be 339 hours annually (1,011 hours over three years).

Exhibit 1. Public Burden Hours for Reading Room Visitations and VZIS Inquiries

Burden Activity	Hours per Person	Annual Activity Count	Hours Annually	Three-Year Total Hours
Reading Rooms - Federal	1	12	12	36
Reading Rooms - State and Local	1	5	5	15
Vulnerable Zone Indicator System (VZIS) Inquiries	1	322	322	966
Total	3	339	339	1,017

Labor Costs

The value of the public's time is estimated to be \$44.40 per hour, based on the average hourly total compensation of private industry workers (BLS 2024a).¹ The State and local government employee average hourly, fully loaded wage rate is \$53.59 (BLS 2024b).² See Exhibit 2.

Exhibit 2. Average Hourly Labor Rates (\$2024)

Labor Category	Fully Loaded Labor Rate (\$/hr)*
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¹Bureau of Labor Statistics. 2024a. Employer Costs for Employee Compensation, September 2024. Table 4. Private industry workers by occupational and industry group. Data release December 17, 2024. Available: <https://www.bls.gov/news.release/ecec.t04.htm>. Note, "Table 4. Employer Costs for Employee Compensation for private industry workers by occupational and industry group" listed hourly compensation (wages and salaries plus fringe benefits). Therefore, the wage rates used in this ICR include salaries, fringe benefits, overhead costs, and general and administrative costs as of September 2024.

² Bureau of Labor Statistics. 2024b. Employer Costs for Employee Compensation, September 2024. Table 3. State and local government workers by occupational and industry group. Data release December 17, 2024. Available: <https://www.bls.gov/news.release/ecec.t04.htm> Note, "Table 3. Employer Costs for Employee Compensation for state and local government workers by occupational and industry group" listed hourly compensation (wages and salaries plus fringe benefits), presents rates for state and local government managerial, technical, and clerical workers. Therefore, the wage rates used in this ICR include salaries, fringe benefits, overhead costs, and general and administrative costs as of September 2024.

Private Industry Workers	\$44.40
State and Local Government Employees	\$62.92

*Fully Loaded Labor Rate includes wages and salaries as well as benefits.

Source: BLS (2024a, 2024b)

EPA estimated the public respondent cost by applying the fully loaded labor rates to the public burden estimates from Exhibit 1. Total estimated burden and costs to the public are 339 hours and \$15,052 annually (1,017 hours and \$45,155 for three years). See Exhibit 3.

Exhibit 3. Public Estimated Burden and Costs

Burden Activity	Annual		Three-Year Total	
	Hours	Cost	Hours	Cost
Reading Rooms - Federal	12	\$533	36	\$1,598
Reading Rooms - State and Local	5	\$222	15	\$666
Vulnerable Zone Indicator System (VZIS) Inquiries	322	\$14,297	966	\$42,890
Total	339	\$15,052	1,017	\$45,155

State and Local Agencies and LEPCs

Labor Burden

State government agencies such as emergency management, environmental protection, health, and natural resources departments can request OCA data from EPA for all facilities in their State. States are authorized and encouraged by the rule to make the OCA information available for reading, but not copying mechanically, in public reading rooms for the same stationary sources as the LEPC in whose jurisdiction the person lives or works and must verify the person's address or place of employment.

LEPCs and related local government agencies such as police, fire, emergency management and planning departments, also are authorized and encouraged by the rule to provide read-only access to OCA sections of RMPs for sources located within the jurisdiction of the LEPC and for any other stationary sources with vulnerability zones extending into the LEPC's jurisdiction in public reading rooms. They are not required to limit the number of stationary sources for which a person can gain access, ascertain a person's identity or place of residence or work, or keep records of public access provided. While local agencies are authorized and encouraged to provide public access to OCA sections of RMPs, they are not required to do so.

State and local government agencies, and LEPCs can obtain OCA data via RMP*Info and via RMP Dataset Download. They must send a written request to EPA so that EPA can ensure that they are a covered person and entitled to receive the data.

Exhibit 4 shows the numbers of CDX registrations by all requestors of OCA data during the previous three-year ICR period. Only a subset of these requestors will be State and local government agencies, but all requestors are used to be conservative in the burden estimate. In addition, LEPCs can request OCA information from EPA for their own use, such as emergency planning, and some of these LEPCs may also provide public read-only access. This ICR assumes the same number of State and local agencies will

register for OCA data access via CDX during this ICR renewal period, or a total of 21 per year. State and local government agencies requesting OCA data include members of SERCs, environmental protection agencies, emergency management agencies, etc.

Exhibit 4. CDX Registrations for Requestors of OCA Data

	2022	2024	2024	Annual Average	Three-Year Total
Total Requestors	34	34	46	38	114

For the previous ICR renewal, EPA contacted a subset of State and local agencies that receive OCA data to obtain numbers of public visits to State and local reading rooms over the then previous ICR period. Based on those contacts, EPA found that the majority of OCA public visits occur at the reading room operated by EPA Headquarters in Washington, DC. The State and local agencies are assumed to spend three hours preparing and providing information to the public during each visit. State and local reading room staff will also spend one hour learning how to handle OCA information securely. Based on an estimated five visits to State and local reading rooms per year, State and local agency staff are estimated to spend 15 hours annually, or 45 hours over three years, to prepare and provide information to the public for reading room visits.

The ICR accounts for the burden associated with submitting letters of request to EPA and registering within CDX. For purposes of estimating the burden associated with these activities, EPA assumes that a State or local agency, or LEPC will spend one hour preparing and submitting a request letter, and one hour registering within CDX for on-line access to OCA data.

Three LEPCs are also assumed to hold five public meetings each year in the three years covered by this ICR (15 LEPCs over three years), which would require eight hours for preparation and to hold each meeting. The total burden hours for State and local agencies are estimated to be 326 hours annually (977 hours for three years). See Exhibit 5.

Exhibit 5. State and Local Agencies and LEPCs Estimated Burden Hours*

Burden Activity	Hours	Annual Average Number	Annual Hours	Three-Year Total
Covered Person Request and Submitting a Request Letter for Access to OCA Data via RMP System	1	38	38	114
Registering within CDX	1	38	38	114
Reading Room	3	5	15	45
Train State and Local Reading Room Staff on OCA	1	60	60	180
Public Meetings	8	15	120	360
Total	14	156	271	813

*Totals may not sum due to rounding.

Labor Cost

EPA estimated the cost for State and local government employees by applying the fully loaded labor rate from Exhibit 2 to the State and local agency burden estimates from Exhibit 6, which results in a cost of \$17,051 annually (\$51,153 for three years). See Exhibit 6.

Exhibit 6. State and Local Agencies Estimated Burden and Costs*

	Annual		Three-Year Totals	
	Hours	Cost	Hours	Cost
Covered Person Request and Submitting a Request Letter for Access to OCA Data via RMP System	38	\$2,391	114	\$7,172
Registering within CDX	38	\$2,391	114	\$7,172
Reading Room	15	\$944	45	\$2,831
Train State and Local Reading Room Staff on OCA	60	\$3,775	180	\$11,326
Public Meeting	120	\$7,550	360	\$22,651
Total	271	\$17,051	813	\$51,153

*Totals may not sum due to rounding.

Total Annual Burden and Costs for All Respondents

As detailed above, respondents for this ICR are State and local officials requesting OCA data from EPA and the members of the public visiting reading rooms and making inquiries on the VZIS. This section, and Exhibit 7, summarize the combined total labor burden and cost for these two categories of respondents.

The total number of annual respondent burden hours is 665. The total labor burden of the information collection is the burden to the public for using the reading rooms and making VZIS inquiries, in addition to the burden for State and local agencies to submit requests as covered persons for CDs, register within CDX, do reading room training, help the public in the reading room, and hold public meetings. Total labor burden is calculated by multiplying unit burden estimates by the number of individuals affected. Total labor cost is derived in a similar manner. The total labor burden and costs associated with the ICR are shown below in Exhibit 7.

Exhibit 7. Total Respondent Labor Burden and Cost

Respondent	Annual		Three-Year Total	
	Burden Hours	Labor Cost	Burden Hours	Labor Cost
Public	339	\$15,052	1,017	\$45,155
State and Local Agencies and LEPCs	271	\$17,051	813	\$51,153
Total	610	\$32,103	1,830	\$96,308

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.

As described above, State and local agencies, and LEPCs wishing to obtain OCA data by CD, RMP* Info, or RMP Dataset Download must send a written request to EPA so that EPA can ensure that they are a covered person and are entitled to receive the data. The current price of a U.S. Postal Service Forever stamp is 73 cents.³ One reading room staff activity is printing the requested RMPs. EPA assumes that a ream of recycled copy paper costs \$7.31 (from GSA Advantage website).⁴ EPA estimates that each visitor to a reading room reviews 10 RMPs of 20 pages each.

The total annual O&M cost for State and local agencies and LEPCs to mail letters to EPA requesting OCA information is approximately \$27.74 (\$83.22 for three years). Assuming a cost of \$7.31 for a ream of recycled copy paper, and that each person visiting a reading room reviews 10 RMPs of 20 pages each, the paper cost per visit is \$2.92. Assuming five visits to State and local reading rooms annually (15 visits for three years), the paper cost is \$14.62 annually (\$43.86 for three years). Total O&M costs are estimated to be \$42 annually (\$127 for three years). See Exhibit 8.

Exhibit 8. O&M Costs for State and Local Agencies and LEPCs

	Annual		Three-Year Totals	
	Count	Cost	Count	Cost
Postage for Submitted Letters Requesting Coverage and Access to OCA Data via RMP System	38	\$27.74	114	\$83.22

³ US Postal Service. 2024. The Postal Store. https://store.usps.com/store/results/stamps/_/N-9y93lv

⁴ GSA Advantage. 2024. Search Results - "Recycled Copy Paper." https://www.gsaadvantage.gov/advantage/ws/search/advantage_search?q=0:8recycled%20copy%20paper&db=0&searchType=0

	Annual		Three-Year Totals	
	Count	Cost	Count	Cost
Paper for the Reading Room (pages)	1,000	\$14.62	3,000	\$43.86
Total		\$42		\$127

EPA anticipates that respondents will incur no capital under this ICR.

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

The Federal government operates the Federal reading rooms, maintains the VZIS software, and provides the State and local agencies with OCA information and technical support upon request. The Federal government may also engage in other activities to provide access to OCA information.

The Federal reading rooms maintain records of reading room use and certifications in accordance with procedures established by the Administrator and the Attorney General, which must be retained for up to three years. The Federal reading room staff view the photo identification of requestors to decrease the likelihood that OCA information is obtained by individuals seeking it for criminal purposes.

The reading room staff view proof of residence and provide access to OCA information only to individuals who have signed a certification that they have not exceeded their allotment. The information recorded on sign-in sheets may be used by law enforcement in the event of a duly authorized investigation of a violation of civil or criminal law. Therefore, these sign-in sheets are retained for three years. The information collected during telephone calls received by the central office from a requestor of OCA information will enable the central office to schedule an appointment for the requestor at a reading room, relay the requested copies of OCA information to that reading room, and, if necessary, contact the requestor. This information is not retained beyond the requestor's appointment date.

The requests from State and local officials for OCA information also must be retained for three years.

14b. Agency Labor Cost Labor Burden

Reading Rooms

EPA and DOJ currently operate 55 reading rooms located at Federal buildings. The EPA Headquarters reading room is operated on a walk-in basis and the others are by appointment only.

Reading room staff activities include taking phone calls from the public, scheduling appointments for use of the reading rooms, printing the requested RMPs, reviewing the identification presented, monitoring the use of the RMPs to ensure that they are not mechanically copied, and shredding them when the

user is finished. Federal reading room staff are assumed to spend two hours performing these activities for each reading room visit by a member of the public. Reading room staff will also spend one hour in training to handle OCA information securely. However, reading room usage has declined significantly with the public availability of RMP data through <https://j4502-fs18.github.io/Right-to-Know/rmp.html>.

EPA Headquarters and EPA Regional reading rooms logged a total of 12 visits per year during the previous ICR renewal period. EPA is maintaining that estimate for this ICR renewal period. Therefore, EPA staff will spend two hours per reading room visit, or 24 hours annually (72 hours for three years).

VZIS Inquiries

EPA also operates the VZIS system, prepares and mails data CDs, creates CDX accounts, and responds to queries through the RMP Reporting Center. EPA staff are estimated to spend 15 minutes responding to each VZIS query and an equal amount of time answering follow up calls for VZIS queries. Thus, EPA estimates that EPA staff will spend 0.5 hours per VZIS inquiry, or 161 hours per year (322 public inquiries x 0.5 hours).

RMP Reporting Center Costs for OCA Data

EPA's RMP Reporting Center maintains OCA data and processes OCA data requests. RMP Reporting Center staff require approximately 1 hour to respond to each request letter and establish each CDX account.

Labor Costs

Federal agency costs were estimated based on U.S. Office of Personnel Management's (OPM) 2024 General Schedule (GS) wage schedule for the Washington-Baltimore-Northern Virginia locality area using a GS-9, step 5. The fully loaded hourly wage rate is estimated to be \$59.44 (base wage rate of \$37.15 x 1.6 (the standard Federal wage overhead rate) for reading room activities and a GS-13, step 5 fully loaded for VZIS operation and preparation of data.⁵ See Exhibit 9.

Exhibit 9. Agency Estimated Labor Rates (2024\$)

Federal wage	Hourly Wage Rate	Fully Loaded Wage*	GS
Reading Room	\$37.15	\$59.4	GS-9, Step 5
Vulnerable Zone Indicator System (VZIS) Inquiries	\$64.06	\$102.50	GS-13, Step 5

* Based on the standard government overhead factor of 1.6.

Sources: OPM (2024)

Exhibit 10 summarizes the labor burden and cost for these activities, after applying the labor rates to the above-described burdens. Total agency labor burden is 278 hours (\$25,093) per year, or 834 hours (\$75,279) over three years.

⁵ U.S. Office of Personnel Management (OPM). 2024. SALARY TABLE 2024 DCB. January 2024. Retrieved from: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf

Exhibit 10. Agency Estimated Labor Burden and Cost (2024\$)

Labor Costs	Unit Burden Hours	Annual		Three-Year Totals	
		Hours	Cost	Hours	Cost
Reading Rooms	2.0	24	\$1,427	72	\$4,280
Train Federal Reading Room Staff on OCA	1.0	55	\$3,269	165	\$9,808
VZIS and Data Requests	0.5	161	\$16,502	483	\$49,506
Responding to a Request Letter and Register Requestor within CDX	1.0	38	\$3,895	114	\$11,685
Total		278	\$25,093	834	\$75,279

*Totals may not sum due to rounding.

14c. Agency Non-Labor Costs

In previous ICRs, reading rooms were assumed to have a computer, monitor, printer, and shredder. The cost for this equipment was calculated in previous ICRs and was assumed to be depreciated over five years. This equipment is standard office equipment which is now expected to be available in all government offices. Therefore, in this ICR renewal, EPA did not calculate the costs for this equipment and this renewal does not include capital costs.

In addition, EPA reading rooms (Headquarters and EPA Regions) print paper copies of RMPs. Using a cost of \$7.31 for a ream of recycled copy paper and assuming each person visiting a reading room reviews 10 RMPs of 20 pages each, the paper cost per visit is \$2.92.⁶ Assuming 12 visits to EPA Federal reading rooms per year (36 visits for three years), the paper cost is \$35 annually (\$105 for three years), which is the total O&M cost for the Federal government. See Exhibit 11.

Exhibit 11. Agency Estimated Non-Labor Cost (2024\$)

O&M Costs	Annual		Three-Year Total	
	Count	Cost	Count	Cost
Paper for the Reading Room (visits)	12	\$35	36	\$105

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.

EPA estimates a small increase in the burden to respondents for this renewal compared to the previous ICR renewal (665 vs. 663 hours). This increase is due to the two additional Federal reading room visits.

⁶ GSA Advantage, Op. cit.

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.

EPA does not publish any data related to this ICR renewal.

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.

This does not apply to this ICR.

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.

Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 1.0 hours per response calculated as a weighted average of public and State and local, and LEPC agency responses. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2003-0073, which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center, WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those

documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0073 and OMB Control Number 2050-0172 in any correspondence.