SUPPORTING STATEMENT
Rule To Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule)
EPA ICR # 2152.01

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

"Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule) - Proposed Rule."

1(b) Short Characterization/Abstract

The United States (U.S.) Environmental Protection Agency (EPA) has proposed a Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule) (CAIR) that includes new reporting requirements and combines these new requirements with existing requirements from the Consolidated Emissions Reporting Rule (CERR), the Emission Reporting Requirements for Ozone State Implementation Plan (SIP) Revisions Relating to Statewide Budgets for NO_X Emissions to Reduce Regional Transport of Ozone (NO_X SIP Call) and the Acid Rain Program under Title IV of the CAA Amendments of 1990. Each of these three existing requirements has an approved ICR in place. The current ICRs are: for the CERR, ICR # 0916.10, for the NO_X SIP Call, ICR # 1857.03 and for the Acid Rain Program, ICR # 1633.13.

This supporting statement and ICR is being submitted to account for the incremental burden associated with the CAIR. As such, this supporting statement references the burden analysis included in ICR #s 0916.10, 1857.03 and 1633.13 and estimates the change in burden resulting from the proposed CAIR on each of these ICRs.

EPA published a Supplemental Notice of Proposed Rulemaking in the Federal Register on June 10, 2004 (69 FR 32684) that among other things, detailed the additions and changes to reporting requirements associated with CAIR. These changes can be logically divided in to two categories: 1. Changes to existing requirements for emission reporting under the CERR and NO_X SIP Call and 2. The addition of reporting requirements to support emissions trading in states using the CAIR model cap and trade rules. Throughout this Supporting Statement, the burden analysis associated with these two categories will be discussed sequentially as "Emission Reporting Requirements" and "Emission Trading Requirements."

Emission Reporting Requirements

Taken together, the existing emissions reporting requirements under the NO_X SIP Call and CERR are already rather comprehensive in terms of the States covered and the information required. Therefore, the practical impact of the changes proposed in CAIR is to impose only three new requirements.

First, in Arkansas, Iowa, Louisiana, Mississippi, and Wisconsin, for which we have proposed a finding of significant contribution to ozone nonattainment in another State but which were not among the 22 States subject to the NO_X SIP Call, the required emissions reporting will be expanded to match those of the 22 States. The change requires that they report NOx emissions during the 5-month ozone season, in addition to the existing requirement for reporting emissions for the full year. CAIR proposes that this new requirement begin with the triennial inventory year prior to the CAIR implementation date. This will be the 2008 inventory year, the report for which will be due to EPA by June 1, 2010.

Second, under the existing CERR, yearly reporting is required only for sources whose emissions exceed specified amounts. Under the CAIR SNPR, the 28 States and the District of Columbia subject to the CAIR for reasons of $PM_{2.5}$ must report to EPA each year a set of specified data elements for all sources subject to new controls adopted specifically to meet the CAIR requirements related to $PM_{2.5}$, unless the sources participate in an EPA-administered emissions trading program. This is like the every-year reporting requirement for controlled sources under the NOx SIP Call, but covering SO_2 in addition to NO_X and covering the whole year – since the $PM_{2.5}$ NAAQS at issue is the annual NAAQS – rather than only the ozone season. This proposal could increase the number of sources for which States must submit reports each year rather than only every third year, if a State chooses to control non-EGU sources under the CAIR SNPR or if the State does not join the EPA trading programs for EGUs. It is proposed that this new requirement begin with the 2009 inventory year, the report for which will be due to EPA by June 1, 2011. After the 2009 reporting year, this new requirement will have no effect on States that fully comply with the CAIR by requiring their EGUs to participate in the EPA model cap-and-trade programs.

Third, in all States, CAIR proposes to expand the definition of what sources must report in point source format, so that fewer sources would be included in non-point source emissions.[1] CAIR proposes to base the requirement for point source format reporting on whether the source is a major source under 40 CFR part 70 for the pollutants for which reporting is required, i.e., for CO, VOC, NO_X, SO_2, $PM_{2.5}$, PM_{10} and ammonia but without regard to emissions of hazardous air

[1]We use the term "non-point source" to refer to a stationary source that is treated for inventory purposes as part of an aggregated source category rather than as an individual facility. In the existing subpart A of part 51, such emissions sources are referred to as "area sources." However, the term "area source" is used in section 112 of the CAA to indicate a non-major source of hazardous air pollutants, which could be a point source. As emissions inventory activities increasingly encompass both NAAQS-related pollutants and hazardous air pollutants, the differing uses of "area source" can cause confusion. Accordingly, EPA proposes to substitute the term "non-point source" for the term "area source" in subpart A, §51.122, and the new §51.125 to avoid confusion.

pollutants. Currently, the requirement for point source reporting is based on actual emissions in the year of the inventory report. This change may require more sources than at present to be reported as point sources every third year. The new approach will make it possible to better track source emissions changes, shutdowns, and start ups over time. It will result in a more stable universe of reporting point sources, which in turn will facilitate elimination of overlaps and gaps in estimating point source, as compared to non-point source, emissions. Under this proposal, States will know well in advance of the start of the inventory year which sources will need to be reported. CAIR proposes that these new requirements begin with the 2008 inventory year, the report for which will be due to EPA by June 1, 2010. EPA has asked for comment on whether this change could instead be practically implemented for the 2005 inventory year, which we believe is desirable if it is practicable. We intend to finalize this proposed change even if for some reason the new emissions reductions requirements of the proposed CAIR and the above two changes in emission reporting requirements are not finalized as proposed, because this change is appropriate for the purposes of monitoring the effectiveness of current SIP programs.

A number of proposed changes will reduce reporting requirements on States or provide them with additional options:

- The NO_X SIP Call rule required the affected States to submit emissions inventory reports for a given ozone season to EPA by December 31 of the following year. The CERR requires similar but not identical reports from all States by the following June 1, 5 months later. The EPA believes that harmonizing these dates would be efficient for both States and EPA. CAIR proposes to move the December 31 reporting requirement to the following June 1, the more generally applicable submission date affecting all 50 States. EPA asked for comment on whether allowing this 5-month delay is consistent with the air quality goals served by the emissions reporting requirements. However, comments were also requested on the alternative of moving forward to December 31 all or part of the June 1 reporting for all 50 States. In particular, comments were solicited on requiring that point sources be reported on December 31 and other sources on June 1. This approach would eliminate the problem of States having to make two submissions for point sources within a 5-month period, and would result in more timely submission of the emissions information for point sources. More timely submission would be particularly useful for point sources because point sources generally are the primary subject of control measures in SIPs. The later June 1 submission date for non-point sources and mobile sources would allow more time for estimating these emissions sources, which in some cases may require vehicle miles traveled or business activity data not available in time for a December 31 submission. In addition, estimating emissions of some types of non-point sources requires prior knowledge of emissions and activity levels at point sources of the same industrial type; therefore, it makes sense to stagger the submission deadlines for those different sources.
- EPA also proposed to eliminate a requirement of the NO_X SIP Call for a special all-sources report by affected States for the year 2007, due December 31, 2008. The normal cycle of every-third-year reporting would also produce the same type of all-sources reports for 2005 and 2008. The EPA originally intended to use the information

on 2007 emissions to re-assess the effectiveness of the NO_X SIP Call in eliminating upwind NO_X emissions that contribute significantly to downwind ozone nonattainment as of the latest 1-hour ozone attainment date within the region. The large majority of the emissions reductions required by the NO_X SIP Call have been assigned to sources that participate in the EPA-administered trading program, which has independent procedures to ensure that emissions reductions are achieved. We now believe that examining 2005 and 2008 inventory submissions and the annual reporting on controlled sources will permit us to evaluate the effectiveness of individual State rules or implementation practices in reducing emissions. We no longer need the special 2007 emissions inventory information to broadly revisit the NO_X SIP Call, and we recognize that preparing that inventory could draw resources away from more important work by State air agencies.

- CAIR proposes to remove a requirement in the existing CERR for reporting annual and typical ozone season day biogenic emissions. Because biogenic emissions vary greatly with daily weather conditions and because there are other practical methods for obtaining hourly estimates across whole regions when needed by EPA, States, or others, EPA believes that this requirement for reporting biogenic emissions serves no useful purpose. This change does not affect the expectation that biogenic emissions be appropriately considered in ozone and $PM_{2.5}$ attainment demonstrations.
- CAIR proposes a new provision which would allow States the option of providing emissions inventory estimation model inputs in lieu of actual emissions estimates, for source categories for which prior to the submission deadline EPA develops or adopts suitable emissions inventory estimation models and by guidance defines their necessary inputs. This provision will allow source reporting to evolve to take advantage of new emissions estimation tools for greater efficiency, although the States will remain required to provide inputs representative of their conditions. It is proposed that this option be available starting with the reports on 2003 emissions.
- EPA proposes to delete the existing requirement that all States report emissions for a winter work week day. This requirement was originally aimed at tracking progress towards attainment of the CO NAAQS. EPA believes applying this requirement to all States is no longer warranted given that CO violations are currently observed in few areas. We believe we can work directly with the remaining affected States to monitor efforts to attain, without requiring formal submission of CO inventories.

The NO_X SIP Call rule and the CERR contain detailed lists of required data elements in addition to emissions, and each rule has its own set of definitions. The two sets of data elements overlap but are not identical. Generally, the NO_X SIP Call rule required more data elements to be reported. The EPA has reviewed both lists in light of more recent experiences and insight into the difficulty States face in collecting and submitting these data elements and their utility to EPA, other States, and other users. We are proposing to combine the separate lists of required elements into a single new list of required data elements. A few data elements are proposed to be eliminated, as explained in the technical support document for inventory reporting. CAIR proposes that these relatively minor changes become applicable starting with the first required

emissions reports following the promulgation of the final CAIR, which we expect to be the reports regarding emissions during 2003, due June 1, 2005.

Emission Trading Requirements

For this ICR, it is assumed that each State will adopt the CAIR SO_2 and NO_X model trading rules, and the burden associated with such a program is evaluated. This trading program burden would include the paperwork burden related to (1) transferring and tracking allowances; (2) the allocation of allowances to affected units; (3) permitting; (4) annual year end compliance certification; and (5) meeting the monitoring and reporting requirements of the program. The monitoring and reporting requirements of a trading program will require capital and labor expenditures by industry, and these are evaluated.

Like with the Acid Rain Program and the NO_X SIP Call, the ability to buy and sell (or transfer) allowances is expected to provide substantial economic benefits by encouraging the greatest emissions reductions where costs of reductions are lowest. Allowance trading cannot be implemented, however, unless regulations governing emissions monitoring and permitting of sources are in place as well. To ensure compliance with the emissions reduction requirements and to provide the regionwide consistency needed to foster the allowance market, the designated representative of the owners and operators of each source with affected units will be required to have CAIR requirements integrated into their Title V permits for the affected source and to certify that an approved SO_2 and NO_X emissions monitoring system has been installed and is properly operated at each affected unit.

For affected units currently required to monitor using Part 75 provisions, information for the proposed allocation methodology will be recorded and collected as part of the emissions monitoring and reporting process. The proposed allocation system is an input based system that uses information that is already needed for purposes of calculating NO_X or SO_2 mass. New unit allocations will be based on the prior year's measured heat input.

While many sources have already installed necessary emissions monitoring equipment due to requirements under other regulations, some sources will need to install new monitors or upgrade existing monitors. Capital costs also usually include the cost of initial certification of new or upgraded monitors is included as part of start-up costs.

Emissions monitoring and reporting by sources in the cap and trade program is fundamental to the allowance trading system. EPA will use the data contained in the reports to verify actual emissions. Without accurate monitoring and reporting of emissions, the integrity of the allowance system would be undermined, and there would be no assurance that the cap is achieved and emissions had been reduced. To meet the emissions monitoring, recordkeeping and reporting requirements, affected units are required to (1) submit a monitoring plan and certification reports for each monitoring system, (2) record hourly emissions data, and (3) submit reports of their emissions and operating data to EPA. Sources with monitors already certified

under Part 75 may be exempt from initial certification requirements.

All participants in the allowance transfer system will be required either to complete and submit an allowance transfer form for each allowance transfer or to perform the transfer on-line. Participants in the transfer system that are not affected sources, such as allowance brokers, fuel suppliers and environmental groups will also be required to file a one time account information application to establish accounts in the allowance tracking systems. For sources affected by the CAIR, allowance transfers currently conducted under the Acid Rain and NOx SIP Call Programs will in the future occur in the context of the CAIR Trading Program.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

One of the goals of this proposed rulemaking is to consolidate the emission inventory reporting requirements found in several existing regulations and streamline the activities involved in submitting the emissions data to EPA. This will enable the EPA to achieve uniformity and completeness in emission inventories used to support national, regional, and local air quality planning and attainment.

While the CAA does not provide a specific authorization for a national emissions data base, the CAA provides the EPA ample legislative authority for acquiring such data. Emissions data are of vital importance to the EPA for fulfilling a host of monitoring, standard-setting, rulemaking, reviewing, and reporting duties. Section 110 and 301(a) of the CAA provide a primary authority for a national emissions data base. Section 110 requires each State to prepare a plan which provides for implementation, maintenance, and enforcement of the primary standard for each pollutant for which air quality criteria have been issued. This plan must include provisions for periodic reports identifying sources and listing amounts of emissions. Section 301(a) authorizes the Administrator to promulgate necessary regulations.

Congressional support for collecting and reporting emissions data is demonstrated in three sections of the CAA. Section 110(a)(2)(F) requires that each State provide for periodic reports on the nature and amounts of emissions of criteria pollutants from stationary sources.

Sections 182(a)(3)(A) and 187(a)(5) of the CAA specify periodic inventory requirements for ozone and CO nonattainment areas, respectively. Section 182(a)(3)(A) requires States with ozone nonattainment areas to submit a current inventory of actual emissions of VOC, NO_X, and CO every 3 years. Section 187(a)(5) requires a similar inventory of actual CO emissions for CO nonattainment areas. Periodic inventories include emission estimates for all point, nonpoint, onroad mobile, nonroad mobile, and biogenic sources. Section 172(c)(3) also provides the Administrator with discretionary authority to require other emissions data as deemed necessary for State Implementation Plan (SIP) development in nonattainment areas to meet the NAAQS. In

1998, EPA promulgated the NO_X SIP Call which requires the affected States and the District of Columbia to submit SIP revisions providing for NO_X reductions to reduce their adverse impact on downwind ozone nonattainment areas. (63 FR 57356, October 27, 1998). As part of that rule, codified in 40 CFR 51.122, EPA established emissions reporting requirements to be included in the SIP revisions required under that action. Another set of emissions reporting requirements, termed the Consolidated Emissions Reporting Rule (CERR), was promulgated by EPA in 2002, and is codified at 40 CFR part 51 subpart A. (67 FR 39602, June 10, 2002). These requirements replaced the requirements previously contained in subpart Q, expanding their geographic and pollutant coverages while simplifying them in other ways.

As noted above, at present, two sections of title 40 of the CFR contain emissions reporting requirements applicable to States: subpart A of part 51 (the CERR) and section 51.122 in subpart G of part 51 (the NO_X SIP Call reporting requirements). The proposed rulemaking would consolidate these, with modifications as proposed below. The modifications are intended to achieve the additional reporting needed to verify the reductions required by the proposed CAIR, to harmonize the emissions reporting requirements, to reduce and simplify them, and to make them more easily understood.

Under the NO_X SIP Call requirements in section 51.122, emissions of NO_X for a defined 5-month ozone season (May 1 through September 30) from sources that the State has subjected to emissions control to comply with the requirements of the NO_X SIP Call are required to be reported by the affected States to EPA every year. However, emissions of sources reporting directly to EPA as part of the NO_X trading program are not required to be reported by the State to EPA every year. The affected States are also required to report ozone season emissions and typical summer daily emissions of NO_X from all sources every third year (2002, 2005, etc.) and in 2007. This triennial reporting process does not have an exemption for sources participating in the emissions trading programs. Section 51.122 also requires that a number of data elements be reported in addition to ozone season NO_X emissions. These data elements describe certain of the source's physical and operational parameters.

Emissions reporting under the NO_X SIP Call as first promulgated was required starting for the emissions reporting year 2002, the year prior to the start of the required emissions reductions. The reports are due to EPA on December 31 of the calendar year following the inventory year. For example, emissions from all sources and types in the 2002 ozone season were required to be reported on December 31, 2003. However, because the Court which heard challenges to the NO_X SIP Call delayed the implementation by 1 year to 2004, no State was required to start reporting until the 2003 inventory year. In addition, EPA recently promulgated a rule to subject Georgia and Missouri to the NO_X SIP Call with an implementation date of 2007. (See 69 FR 21604, April 21, 2004.) For them, emissions reporting begins with 2006. These emissions reporting requirements under the NO_X SIP Call affect the District of Columbia and 22 of the 29 States affected by the proposed CAIR.

As noted above, the other set of emissions reporting requirements is codified at subpart A of

part 51. Although entitled the CERR, this rule left in place the separate §51.122 for the NO_X SIP Call reporting. The CERR requirements were aimed at obtaining emissions information to support a broader set of purposes under the CAA than were the reporting requirements under the NO_X SIP Call. The CERR requirements apply to all States.

Like the requirements under the NO_X SIP Call, the CERR requires reporting of all sources at 3-year intervals (2002, 2005, etc.). It requires reporting of certain large sources every year. However, the required reporting date under the CERR is 5 months later than under the NO_X SIP Call reporting requirements. Also, emissions must be reported for the whole year, for a typical day in winter, and a typical day in summer, but not for the 5-month ozone season as is required by the NO_X SIP Call. Finally, the CERR and the NO_X SIP Call differ in what non-emissions data elements must be reported.

2(b) Practical Utility/Users of the Data

Emission Reporting Requirements

Emissions data and related information on stationary point and nonpoint sources, as well as nonroad mobile and onroad mobile sources, are routinely used by the OAQPS and the EPA Regional Offices in carrying out a variety of activities. These activities support regulatory functions as well as functions that are more programmatic in nature such as trends analyses. Such projects include:

- Evaluation of existing control strategies, such as the NO_X SIP Call, for States and larger areas;
- Evaluation of proposed control strategies for States and larger areas, including applications of regional scale models;
- Development of national control strategies and preparation of Regulatory Impact Analyses (RIA);
- Preparation and publication of national summaries of emissions including trend analyses;
- As a data base to assist in the identification of important source categories for future regulation; and
- Preparation of the stationary source portion of a report to Congress on SO_2 emissions. This report is required by Section 406 of the CAA and is due on a 5-year cycle that began on January 1, 1995. The report must contain an inventory of national annual SO_2 emissions from industrial sources (as defined in Title IV of the CAA).

EPA's Office of Research and Development (ORD) uses emissions source data in determining priorities for control technology research and as a key data component in the application of regional scale models. The EPA's Regional Offices use emissions and other source parameters to support source inspections and in the analyses of the impact of new or modified sources within an area. EPA's Emission Factor and Inventory Group (EFIG) use the data to assess and analyze trends in criteria pollutant emissions over time.

In addition to supporting projects and initiatives internal to EPA, both the OAQPS and the Regional Offices respond to numerous requests for reports on emission sources. Typically this is done under the Freedom of Information Act. Most requests come from contractors and consultants involved in special studies; a smaller number come from the press and universities and others involved in research.

The collection of emissions data specific to nonattainment areas for certain criteria air pollutants is necessary to comply with requirements specified in Title I of the CAA. States with nonattainment areas rely on current information for point, nonpoint, and mobile sources to revise their SIPs and to plan for emission reductions mandated by the CAA. In addition, a statewide inventory compiled at least every 3 years for all point, nonpoint, and mobile sources is considered to be a key tool to assist States in meeting CAA requirements that address emissions tracking, compliance issues, and mid-course adjustments. Statewide emission inventories can be used by States affected by pollution transport from upwind areas to develop more efficient control strategies to meet the NAAQS. Statewide emission inventories that were developed by EPA (the NEI) are being used by the Regional Planning Organizations (RPOs) as the starting point for the development of statewide emission inventories used in the regional haze program to define control strategies.

Emission Trading Requirements

Permit applications, including proposed compliance plans, will be used by EPA to issue operating permits and to allocate allowances. A permit application will be legally binding on the owners, operators, and designated representative of a source until the actual permit is issued. Affected sources may rely on the permit for information on the requirements with which they must comply. Because permit applications and permits will be public documents, they may be used by the public to examine activities undertaken by affected sources.

Data from emissions monitoring is indispensable to successful implementation of the trading programs for two reasons:

- The primary purpose of the trading programs is to assist States in the attainment of the ozone and fine particulate matter national ambient air quality standards (NAAQS) by reducing the adverse effects of the transport of ozone, ozone precursors and fine particles from upwind States by reducing annual emissions of sulfur dioxide and nitrogen oxides; and

- EPA can only enforce the program by comparing, for each affected unit, emissions data and the number of allowances held.

Information collected on allowance transfers will be used by EPA or its designated agent to track allowances for the purpose of determining compliance with the NO_X and SO_2 Trading Programs. Information on allowance transfers will also be used by participants in the allowance market and the public to evaluate the activities of affected sources, and by EPA for program evaluation.

Together, the allowance trading system, operating permits, and emissions data will help to provide the accountability to allow the NO_X and SO_2 Trading Programs to function without more stringent command and control approaches.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

Emission Reporting Requirements

Previous reporting requirements have occasionally forced State agencies into inefficient collecting and reporting activities. The proposed rule seeks to simplify emission inventory reporting by States to EPA, offer options for data collection and exchange, and unify reporting dates for various categories of inventories to avoid duplication of effort. For example, under the NO_X SIP Call rule, the EPA is requiring States to submit annual inventories for all NO_X sources for which States adopt control measures to meet their NO_X budget. Every 3 years, statewide NO_X inventories of all controlled and uncontrolled sources are required. The CERR rule also requires annual and triennial emission inventory reporting of many of the same data elements. By aligning reporting dates and combining data from these collection activities will avoid duplication of information collected from sources, minimize the burden on the industry, and reduce the effort for State and local government agencies to compile the data.

The EPA will allow the direct reporting of point source data from sources to EPA to satisfy this requirement if the sources are subject to the monitoring and reporting requirements of 40 CFR Part 75. The direct reporting of data from sources to EPA will minimize the reporting burden on States. Also, direct reporting will avoid duplication of effort for sources subject to the Part 75 requirements.

Emission Trading Requirements

Reporting requirements for affected sources for the CAIR NO_X and SO_2 Trading Programs will be integrated with existing electronic data reporting (EDR) formats. The EDR formats are

currently used by Acid Rain Program units under Title IV of the Act and units subject to the NO_X SIP Call Trading Program implemented under Title I of the Act. Thus, for units subject to Acid Rain or the CAIR quarterly reporting requirements, or both, only one submission will need to be made on a quarterly basis.

3(b) Public Notice Required Prior to ICR Submission to OMB

Not required. This is a rule related ICR.

3(c) Consultations

Emission Reporting Requirements

Because the emission reporting requirements for CAIR were developed after the NPR was published on January 30, 2004 (69 FR 4566), consultations with the stakeholder community were necessarily limited. Since the publication of the SNPR on June 10, 2004 (69 FR 32684), discussions have been held with STAPPA/ALAPCO to clarify EPA's logic in developing the proposed rule and to answer questions.

Emission Trading Requirements

The requirements for the CAIR Trading Programs have been developed using both the methodology found in existing trading programs as well as consultations with interested parties. EPA built on the cap and trade strategy used in the Acid Rain Program, Ozone Transport Commission's NO_X Budget Program, and the NO_X SIP Call.

EPA held two workshops with states in the NO_X SIP Call or OTC programs to discuss lessons learned in those programs. Additionally, EPA has frequent interaction with affected sources and states in the course of implementing the Acid Rain and NO_X SIP Call Trading Programs. EPA has received comments following the workshops and through these less formal interactions and considered and incorporated those comments into the proposed rule and ICR.

Finally, as part of updating the ICR for the Acid Rain Program (Part 75) monitoring requirements, EPA contacted various affected parties to gather information on CEM capital costs, CEM operation and maintenance costs, fuel meter capital costs, and CEM/fuelmeter testing costs. That information has been used in this ICR where appropriate.

3(d) Effects of Less Frequent Collection

Emission Reporting Requirements

The submittal dates required for reporting of emissions data to EPA have been established to minimize the burden on State and local agencies, but also to ensure that State and local agencies

are collecting timely and sufficient emissions inventory data to support their air pollution control efforts. A statewide inventory compiled at least every 3 years for all point, nonpoint, and mobile sources is considered important to assist States in meeting various CAA requirements.

If the information collection were not carried out every 3 years for all sources and annually for major point sources, the EPA would not be able to maintain a central, national repository of emissions data from which to extract updated information needed to fulfill EPA mandates.

If this information collection were not carried out annually for sources being controlled to meet the SO_2 and NO_X budgets, EPA would not be able to verify that emission reductions necessary to meet each State's SO_2 and NO_X emission budgets were being achieved.

In addition, a triennial report of all NO_X sources statewide is vital in enabling EPA to track States' progress towards meeting the NO_X budgets. Because the SO_2 and NO_X budgets prescribed have been deemed essential in order for downwind States to attain the NAAQS in a timely manner, data collected less frequently would be of little or no use.

Emission Trading Requirements

Submittal of allowance trading information and compliance information on an annual basis provides necessary feedback on the allocation of allowances. If this information collection were not carried out annually for sources being controlled to meet the SO_2 and NO_X budgets, EPA would not be able to verify that emission reductions necessary to meet each State's SO_2 and NO_X emission budgets were being achieved. Because the SO_2 and NO_X budgets prescribed have been deemed essential in order to aid downwind States in attaining the NAAQS in a timely manner, data collected less frequently would be of little or no use.

Quarterly collections of emissions data allows the opportunity to check data for errors and provide rapid feedback on needed adjustments to data collection systems, and thereby promotes 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.

3(e) General Guidelines

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

3(f) Confidentiality

Any data that is submitted to EPA under this proposed rule will be considered in the public domain and cannot be treated as confidential.

As required by Section 114 of the Clean Air Act, estimates or measurements of emissions must be treated as nonconfidential. 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 following: 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, EPA Regional Office should be consulted for final reconciliation.

3(g) Sensitive Questions

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

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/Standard Industrial Classification (SIC) Codes

The emissions data required by the proposed rule will generally be submitted by State air pollution control agencies. Under the CERR, there are 55 State and Territorial air pollution control agencies, as well as 49 local air agencies that will be subject to the national reporting requirements and will be required to compile and report emissions information for large stationary point sources on an annual basis, and for smaller point sources, stationary nonpoint and mobile sources on a 3-year basis. The NO_X SIP Call required 22 States to report NO_X emission related data on an annual and triennial basis. For five states, Arkansas, Iowa, Louisiana, Mississippi, and Wisconsin, we have proposed that they be added to the 22 States subject to the NO_X SIP Call. For these five states, the required emissions reporting will be expanded to match those of the 22 States. In addition, the 28 States and the District of Columbia subject to the CAIR for reasons of PM2.5 must report to EPA each year a set of specified data elements for all sources subject to new controls adopted specifically to meet the CAIR requirements related to PM2.5, unless the sources participate in an EPA-administered emissions trading program. The affected SIC code would be *9511 - Air and Water Resource and Solid Waste Management*, which includes governmental environmental protection and control agencies, and pollution control agencies.

This ICR also estimates a burden for affected industry sources to monitor SO_2 and NO_x mass emissions and demonstrate compliance with SO_2 and NO_x control measures. Sources may report data directly to EPA if a source is required to meet the monitoring and reporting requirements of Part 75. It is expected that States will choose to control large electric utility sources to comply with their SO_2 and NO_x emissions budgets. Electric utility combustion sources are generally classified as either SIC 4911 - *Electric Services,* or 4931 - *Electric and Other Services Combined* [NAICS 221112 Electric Power Distribution].

4(b) Information Requested

Emission Reporting Requirements

The CERR and NO_X SIP Call established the basic emission reporting requirements. The proposed CAIR would change some of these requirements such that the previously accounted for reporting burden would also change. Only the changes to the CERR and NO_X SIP Call reporting requirements that would change reporting burden are discussed here.

The following section describes the required data items that would be changed by the proposed CAIR.

(i) Data items, including recordkeeping requirements

The proposed CAIR would eliminate the following data related items from previous requirements:

- All data items required for the reporting of annual and ozone season biogenic emissions;
- Winter work weekday emissions for point sources, nonpoint sources, onroad mobile sources and nonroad mobile sources.

(ii) Respondent activities

For the emission inventory reporting requirements of the proposed CAIR, respondent activities are very similar to what has been required to satisfy reporting under CERR and the NO_X SIP Call. The specific State respondent activities associated with the CAIR that are changes from the existing CERR and NO_X SIP Call requirements are outlined below, and are grouped into one-time, annual, and triennial activities.

The one-time State burden items include:

- Read the reporting requirements of the rule;

- Elimination of the requirement in the NO_X SIP Call for a special all-sources report for the year 2007.

Annual State activities include:

- Adopts the definition of a point source as being a major source under 40 CFR part 70 for the pollutants for which reporting is required, *i.e.,* for CO, VOC, NO_X, SO_2, $PM_{2.5}$, PM_{10} and NH_3 but without regard to emissions of hazardous air pollutants

- Harmonizes the reporting dates under CERR and NO_X SIP Call.

Triennial State activities include:

- Adopts the definition of a point source as being a major source under 40 CFR part 70 for the pollutants for which reporting is required, *i.e.,* for CO, VOC, NO_X, SO_2, $PM_{2.5}$, PM_{10} and NH_3 but without regard to emissions of hazardous air pollutants

- Harmonizes the reporting dates under CERR and NO_X SIP Call.

Emission Trading Requirements

This section describes the data items requested from affected sources for the collections described in this ICR. This section also defines the activities in which respondents must engage to assemble, submit, or store these data items.

(i) Data Items, Including Recordkeeping Requirements

(a) Allowance Tracking

There are several data items required for allowance tracking activities. First, the affected source must submit account certificates of representation for the CAIR designated representative and (if desired) alternate CAIR designated representative. This documentation, found in 40 CFR §§ 96.113 and .213, must include:

- Identification of the source and unit,
- Dates on which the unit commenced operation and commenced commercial operation,
- Name and contact information for the CAIR designated representative and alternate,
- A list of the owners and operators of each source and unit, and
- A certification statement and signature of the CAIR designated representative and alternate.

Certification applications are to be kept for a period of 5 years pursuant to the general requirements imposed for Title V permitted facilities.

(b) Permitting

The basic requirement for permitting will be an application for a permit revision to a source's operating permit issued under Title V of the Act. Although there is some possibility that a non-Title V source could be affected under the CAIR Trading Program, all affected sources are assumed to be Title V sources for purposes of this ICR. Except for the permit revision application, all of the other monitoring, reporting or recordkeeping requirements associated with Title V permitting are either part of the baseline Title V requirements or are covered separately

under section 4(c). Title V permit applications must be kept for 5 years pursuant to Title V recordkeeping requirements. In addition, coal-fired units that are not part of the Acid Rain Program are expected to have to apply for a permit to construct under Title I of the Act.

(c) Monitoring and Reporting

Affected trading program sources would be required to monitor SO_2 and NO_X mass emissions, and record and report emissions data using the requirements of 40 CFR Part 75. 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, and (3) record hourly operational, pollutant monitor, and flow monitor data for each affected unit and submit quarterly reports of their emissions data to EPA.

Respondents are required by 40 CFR 75.64 to submit the quarterly SO_2 and NO_X mass emissions data electronically, by direct electronic submission to EPA, and must also 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.

(ii) Respondent Activities

The primary tasks that will be performed by trading program respondents to meet the emissions monitoring requirements are (1) completing and submitting appropriate monitoring plan forms for each affected source and each affected unit at a source; (2) conducting tests to certify the operation of monitors, and submitting test results to EPA; (3) recording hourly emissions data (this activity generally is performed electronically); (4) operation and maintenance activities associated with the monitoring, including quality assurance activities; (5) assuring data quality, preparing quarterly reports of emissions data and submitting these reports to EPA; and (6) responding to error messages generated by EPA. In addition, respondents will have to purchase the necessary monitoring hardware and purchase the electronic data reporting software (or software upgrades).

5. THE INFORMATION COLLECTED–AGENCY ACTIVITIES, COLLECTION METHODS, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Emission Reporting Requirements

The EPA activities associated with the rule include:

- Receiving, reviewing, and storing emission inventory data submitted by each State;

- Processing and updating data submitted by States, including performing quality assurance of data, and coordination of efforts to resolve errors and anomalies; and

- Fulfilling information requests.

Emission Trading Requirements

The major EPA activities related to the CAIR Trading Program include (1) maintenance and administration of the SO_2 and NO_X allowance tracking systems, (2) reviewing permit applications, (3) reviewing monitoring plans and certification applications, (4) processing, reviewing and evaluating reports of quarterly emissions data from affected units, (5) calculating/reviewing annual emissions from affected sources, and (6) reviewing total annual emissions data submitted to track each State's progress toward meeting its budgets and creating a summary report of emissions. EPA will use a computer system to track and maintain monitoring and emissions information. EPA will also answer respondent questions and conduct audits of data submissions.

5(b) Collection Methodology and Management

Emission Reporting Requirements

The EPA has establishing a central repository of inventory data for all States termed the National Emissions Inventory (NEI) database. Emissions inventory data reported electronically will be stored in the NEI database and used by the EPA and by other States for air modeling, tracking progress in meeting CAA requirements, setting policy and answering questions from the public.

The EPA has created and maintains the NEI database as a central repository of inventory data for all States, but the data must be supplied by the States in electronic form. The EPA currently requires that States use the NEI Input Format (NIF) for electronic data reporting (EDR).

Emission Trading Requirements

To ensure consistency regionwide and to expedite data entry, EPA will require that standard electronic data reporting (EDR) formats used for Part 75 reporting be used to submit the information collected for the CAIR SO_2 and NO_X Trading Programs.

Several computer systems and associated databases have been developed to (1) track allowances, (2) record quarterly emissions monitoring data, and (3) calculate the number of allowances to be deducted each year. 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 EPA also has established a Clean Air Markets Page on the Internet, which includes

detailed information collected from emissions reports. Those without access to the Internet may use the Clean Air Markets Hotline to request information, including summary reports. The Agency expects to rely on these electronic means to disseminate information about the CAIR Trading Program as the program is developed and implemented.

5(c) Small Entity Flexibility

Emission Reporting Requirements

State and Territorial control agencies are not considered to be small entities. According to EPA's ICR Handbook, OMB's definition for a small entity includes small governmental jurisdictions with populations of less than 50,000. According to 1999 population data from the U.S. Census Bureau, no State or Territory has a population below this threshold. However, certain local air pollution agencies may be in charge of individual counties or multi-county areas whose population is less than 50,000.

These local agencies have had experience compiling their 2002 inventories that were submitted to EPA in June 2004 as required by the CERR. The emission reporting requirements in CAIR are estimated to result in a net burden reduction for the reporting agencies.

Emission Trading Requirements

The CAIR Trading Program includes fossil fuel-fired units (stationary boilers, combustion turbines, and combined cycle systems) that serve an electrical generator of capacity greater than 25 MWe. Units with a lower capacity are not included because of the high cost of monitoring emissions from these sources and the *de minimis* nature of their emissions.

There is one small unit provision applicable to the CAIR Trading Program which provides for reduced monitoring. The low mass emissions provisions (40 CFR 75.19), allows optional reduced monitoring, quality assurance, and reporting requirements for units that combust natural gas and/or fuel oil and that emit no more than 100 tons of NO_X annually provided that no more than 50 tons of NO_X is emitted in the ozone season (May 1 – September 30) and no more than 25 tons of SO_2 annually and that calculate no more than the same amount based on specified procedures for calculating and reporting emissions. Qualifying utilities are not required to keep monitoring equipment installed on (or conduct fuel sampling for) low mass emissions units, nor are they required to perform quality assurance or quality control tests. Moreover, emissions reporting requirements are significantly simplified for these units.

Even if a gas- or oil-fired unit does not qualify for the "low mass emissions unit" provisions, the monitoring provisions of Part 75 do allow for the use of alternative methods to determine emissions. As discussed in the Regulatory Impact Analysis (RIA) of the final Acid Rain Implementation Regulations (October 19, 1992), smaller utilities are more likely to be dependent on these oil- and gas-fired units, especially very small utilities (see p. 5-14 of that RIA

document). This analysis remains relevant to this rulemaking.

5(d) Collection Schedule

There are two requirements in the proposed CAIR that will impact the reporting schedule for the States. First, EPA is harmonizing the reporting due dates in the CERR and NO_X SIP Call. Instead of having a due date of 12 months following the end of the year for the NO_X SIP Call and 17 months for CERR required reporting, EPA is proposing 17 months for both requirements. The second change is to delete the requirement under the NO_X SIP Call that affected States must report an emission inventory for 2007 which would have been due on December 31, 2008.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Emission Reporting Requirements

The respondent burden for complying with the reporting requirements of the rule is estimated incremental to the burden associated with existing annual inventory and periodic inventory reporting requirements.

In general, States already have mechanisms in place for reporting emissions data to EPA under the existing CERR and NO_X SIP Call inventory requirements. The changes to the existing reporting requirements are specified in Section 4(b)(i) of this supporting statement.

Other ongoing State activities that support existing inventory reporting requirements include:

- Collecting emissions data and other associated information;
- Training staff in coding and submissions techniques;
- Quality-assuring emissions data and resolution of errors and anomalies identified by EPA;
- Maintaining records associated with data submitted by sources; and
- Preparing and submitting required inventory data items in approvable format.

The following sections discuss the assumptions used to develop burden hour estimates for one-time only activities, annual activities, and triennial activities. Table 6-1 lists the burden items included under these categories, and presents their associated burden hours for 1 year. In general, managerial time was estimated to be 5 percent of technical staff time. Burden hours and associated costs were estimated for the first 3-year period that the affected States would have to start reporting emissions data to EPA. In this case, that period corresponds to the years 2006, 2007, and 2008. Table 6-2 shows the required activities that a State must perform each year, beginning in the year 2006 through 2008. Table 6-3 presents the State and local respondent annual burden hours and costs by activity.

One-time activities

The time for States, Territorial, and local agencies to read and interpret the reporting requirements of the rule was estimated to be 1 hour for technical staff and 1 hour for managerial staff.

The remaining one-time activity is the elimination of the requirement in the NO_X SIP Call for a special all-sources report for the year 2007. This supporting statement estimates burden using methods similar to the ones used for the CERR and the NO_X SIP Call. Thus for the NO_X SIP Call there are 22 respondents (21 states plus the District of Columbia). This decrease in burden was estimated by first estimating the burden for each respondent, then multiplying by the number of respondents. The burden per respondent was estimated in the NO_X SIP Call ICR supporting statement to be 8 hours of technical staff time, and 0.4 hour of managerial staff time.

Annual activities

There are two annual burden items associated with this ICR. In the first, the proposed CAIR would adopt the definition of a point source as being a major source under 40 CFR part 70 for the pollutants for which reporting is required, *i.e.,* for CO, VOC, NO_X, SO_2, $PM_{2.5}$, PM_{10} and NH_3 but without regard to emissions of hazardous air pollutants. Annual burden for this proposed change was estimated as follows. EPA has done an analysis of the change in the number of sources that the States would be required to report under this proposed change. This analysis looked at the number of point sources that were actually reported to EPA by the States in their 1999 emission inventory submittals and compared these with the number of sources that would have been required to report under the CERR definition and the number that would be required using the 40 CFR part 70 proposed definition. (Note: States were not required to report under the CERR until the 2002 inventory year. The 2002 point source results were not available in time for this analysis. The 1999 results are believed to be representative.) The results of this analysis are given in Table 6-4. Nationally, the States are reporting a total of 52,277 point sources. The CERR definition would require that 7385 point sources be reported. Using the proposed 40 CFR part 70 definition, the reporting requirement would increase to 17,316, still well below the number of the sources that are being reported. On a State level basis, there are seven states, AK, AR, FL, GA, HI, IA and SD, plus the District of Columbia that report fewer point sources to the NEI than would be required under the proposed definition of 40 CFR part 70. Since each of these eight respondents is required to maintain records on the sources under 40 CFR part 70, the additional burden to estimate emissions from these sources and report them to EPA should be modest. EPA estimates that each respondent would spend 40 hours of technical staff time and 2 hours of managerial staff time.

The second item will result in a decrease in reporting burden to the States by harmonizing the reporting dates under the CERR and the NO_X SIP Call. To estimate the decrease in burden, EPA estimated that each of the 22 respondents subject to the NO_X SIP Call reporting requirements would save 40 hours of technical staff time and 2 hours of managerial time by

having to make a single emissions report instead of the two currently required.

The proposed CAIR also proposes to eliminate the requirement that all States report emissions for a winter work weekday. While this will result in some reduction in burden, EPA believes that it will be small and did not estimate it.

Triennial activities

The major items that impact triennial burden are the same as for annual burden. The discussion under "annual activities" is repeated here for completeness. The proposed CAIR would adopt the definition of a point source as being a major source under 40 CFR part 70 for the pollutants for which reporting is required, *i.e.,* for CO, VOC, NO_X, SO_2, $PM_{2.5}$, PM_{10} and NH_3 but without regard to emissions of hazardous air pollutants. Annual burden for this proposed change was estimated as follows. EPA has done an analysis of the change in the number of sources that the States would be required to report under this proposed change. This analysis looked at the number of point sources that were actually reported to EPA by the States in their 1999 emission inventory submittals and compared these with the number of sources that would have been required to report under the CERR definition and the number that would be required using the 40 CFR part 70 proposed definition. (Note: States were not required to report under the CERR until the 2002 inventory year. The 2002 point source results were not available in time for this analysis. The 1999 results are believed to be representative.) The results of this analysis are given in Table 6-4. Nationally, the States are reporting a total of 52,277 point sources. The CERR definition would require that 7385 point sources be reported. Using the proposed 40 CFR part 70 definition, the reporting requirement would increase to 17,316, still well below the number of the sources that are being reported. On a State level basis, there are seven states, AK, AR, FL, GA, HI, IA and SD, plus the District of Columbia that report fewer point sources to the NEI than would be required under the proposed definition of 40 CFR part 70. Since each of these eight respondents is required to maintain records on the sources under 40 CFR part 70, the additional burden to estimate emissions from these sources and report them to EPA should be modest. EPA estimates that each respondent would spend 40 hours of technical staff time and 2 hours of managerial staff time.

The second item will result in a decrease in reporting burden to the States by harmonizing the reporting dates under the CERR and the NO_X SIP Call. To estimate the decrease in burden, EPA estimated that each of the 22 respondents subject to the NO_X SIP Call reporting requirements would save 40 hours of technical staff time and 2 hours of managerial time by having to make a single emissions report instead of the two currently required.

In addition to these two items, there are two other items that will impact triennial burden. The proposed CAIR proposes to add five additional states (AR, IO, LA, MS and WI) that would be subject to the NO_X SIP Call reporting requirements. These States would have the additional burden of having to estimate and report NO_X emissions for the five month ozone season in addition to the existing requirement for reporting emissions of all pollutants for the full year.

This requirement is proposed to be effective for the 2008 inventory year. For these States, EPA estimates that each respondent would spend 24 hours of technical staff time and 1 hour of managerial staff time. The second item is the elimination of the CERR reporting requirement that States report annual and ozone season biogenic emissions to EPA. The CERR ICR estimated this burden to be 40 hours of technical staff and 2 hours of managerial staff time for each of the 55 State and Territorial respondents.

There are two additional proposed CAIR changes that would only impact triennial burden. The proposed CAIR proposes to change the requirement for the reporting of summer day emissions. The proposal would require the reporting of summer day emissions only from States that have ozone nonattainment areas, or which can be shown to make a significant contribution to ozone formation in another State, instead of from all States. This will result in a small reduction in burden which was not estimated. The proposed CAIR also proposes to eliminate the requirement that all States report emissions for a winter work weekday. While this will result in some reduction in burden, EPA believes that it will be small and did not estimate it.

Emission Trading Requirements

This section estimates the paperwork burden and cost of submitting permit applications, allowance tracking and transfer materials (including applications for early reduction credits), year-end compliance certifications, submittal of monitoring plans, obtaining certification of each monitoring system, conducting monitor quality assurance activities, and recording and reporting data from CEM systems (or approved alternatives).

To estimate the burden and/or cost of each incidence of the various proposed rule revisions, EPA had available prior estimates of the costs of various activities, estimates provided by affected utilities in comments to the Agency, and estimates based on the Agency's experience in implementing the existing trading programs.

For the purposes of this analysis, the trading sources are grouped into the following categories:

- Trading units subject to Title IV Acid Rain monitoring requirements (40 CFR Part 75) that are located in the NO_X SIP Call (SIP) region ("AR-SIP");
- Trading units subject to Title IV monitoring requirements that are not located in the NO_X SIP Call region ("AR-NOSIP");
- Trading units not subject to Title IV monitoring requirements that are located in the NO_X SIP Call region ("NAR-SIP"); and
- Trading units not subject to Title IV monitoring requirements that are not located in the NO_X SIP Call region ("NAR-NOSIP")

The NO_X Trading Program requires all affected sources to monitor a NO_X emission rate, SO_2 emission rate and heat input in order to determine NO_X mass emissions and SO_2 mass emissions.

Affected gas- and oil-fired units may elect to use a SO_2 emissions rate CEM and a fuel flowmeter. In addition, peaking units that burn natural gas and/or fuel oil may use an alternative method for calculating NO_X emission rates. EPA will also allow certain low mass emissions units to use assumed emissions factors together with operational data to calculate emissions.

The NO_X SIP Call Program is a regionwide cap-and-trade program that targets utility and large industrial combustion sources to facilitate NO_x emissions reductions in the NO_X SIP Call region. The NO_X SIP Call States include Alabama, Connecticut, Delaware, Georgia, Illinois, Indiana, Kentucky, Maryland, Michigan, Missouri, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Virginia, West Virginia and the District of Columbia. For purposes of this ICR, it is important that the burdens and costs be calculated only in terms of incremental impacts for units located in these states. Similarly, states not in the NO_X SIP Call region have existing requirements for CEMS in some cases that a unit will already be subject to. Thus, it should be noted that the labor hour and cost estimates per unit identified in this document, represent the weighted average burden and cost for all units and do not represent the actual burden and cost for a particular unit.

The following discussion highlights some of the basic differences for the four basic categories of units:

For AR-SIP units, EPA believes that the only labor burdens will be associated with permit applications and certain allowance transactions. These units will not incur additional burdens (or capital and operating and maintenance costs) as a result of the CAIR since they have already installed and are operating a CEMS (or approved alternative) and meet Part 75 requirements for both SO_2 and NO_X.

AR-NOSIP units are monitoring NO_X emission rates in accordance with Part 75. However, these sources are not required to report NO_X mass emissions. They are also measuring and reporting SO_2 mass emissions, which requires heat input measurement that can be used with the NO_X emission rate information to calculate NO_X mass emissions. Therefore, these sources would need to make minor modifications to their reporting practices in order to report NO_X mass emissions for this program, but would not likely need to purchase additional monitoring equipment. This ICR reflects some incremental monitoring costs for these sources.

NAR-SIP units are already required to meet the monitoring and reporting requirements in Part 75 for NO_X. These units are required to calculate and report hourly, quarterly and ozone season or annual NO_X mass emissions. These sources would continue monitoring and reporting NO_X mass emissions. Ozone season only reporting is an option for non Acid Rain sources in the NO_X SIP Call Trading Program but not the CAIR. These sources would need to monitor and report NO_X mass emissions year round; therefore needing to modify operational practices but not purchase any equipment. There will also be labor burdens associated with permit applications, certain allowance transactions, and some additional emission collection and reporting, and the installation of systems to measure SO_2 in accordance with Part 75. These sources will need to

make some additions to their existing monitoring systems to account for SO_2 mass emissions, but will not need to install a full monitoring and reporting system in order to comply with the monitoring and reporting requirements in the CAIR SO_2 Trading Program. As a result, these units will incur additional capital and other operating costs. Finally, NAR-SIP units are expected to incur some costs associated with upgrading the data acquisition and handling system (DAHS) to collect the new SO_2 and additional NO_X data for this program.

For NAR-NOSIP units, the respondents will incur the largest impact with regard to monitoring since these are the sources that currently are not required to monitor according to Part 75. Monitoring will depend on the type of fuel and the amount of time the unit is operated. Therefore, the costs will vary depending on what monitoring alternative is appropriate for the unit and what monitoring requirements apply to the unit under other regulatory programs.

Sources will be subject to the CAIR Trading Programs monitoring and reporting requirements in 2009. Compliance with the emissions caps–with allowance holding requirements--begins in 2010. Table 6-5 shows the burden associated with monitoring SO_2 and NO_X under CAIR trading programs at the various types of sources.

The primary tasks performed by owners and operators of affected units are (1) permitting, (2) monitoring, recording, and reporting emissions data, (3) allowance trading activities and (4) submittal of the year end compliance certification.

(i) Permitting.

Each affected entity will have to submit a permit revision application to include in the source's Title V permit the necessary conditions related to compliance with the CAIR Trading Programs. The Agency believes that this application should be relatively routine, and that a standard method of incorporating the requirements by reference or a standard set of permit conditions will be available. The Agency estimates that, on a per unit basis, about 4 managerial hours will be required to revise the Title V permit.

Some sources will also be required to construct additional facilities, and therefore will need to complete a permit to construct application. The Agency estimates that this requirement will be necessary for all coal-fired units that are not in the Acid Rain Program and that the task will take 20 hours of managerial and 20 hours of technician time, per permit.

(ii) Monitoring.

For monitoring, the burdens differ greatly based on the amount and type of monitoring the unit is already subject to and the particular subtask of monitoring being conducted. The specific elements of burden are:

Start-up Activities. A large part of start-up activities involves capital and test contractor

costs. However, the owner or operator will incur some labor burden for these activities, as applicable. For AR-SIP units, the program imposes no start-up burdens beyond existing programs. For AR-NOSIP units, the owner or operator will incur some small amount of burden associated with DAHS upgrades. For the both NAR-SIP and NAR-NOSIP units, the burdens reflect burdens for arranging for CEMS purchase (as required) and oversight of the certification process. The NAR-SIP units will have a smaller burden since NO_X mass is already being measured and reported.

Regulatory Review. The ICR includes an allocation of time for the managerial and technical staff to review the regulatory requirements and the EDR formats and instructions. The NAR-NOSIP units will have a burden similar to that estimated for Acid Rain Program units in the Acid Rain Program ICR -- 24 hours of managerial time and 24 hours of technician time in year one of the program and 4 hours each for managerial and technician time, per year, after year one. The burden estimates for all Acid Rain units and NAR-SIP units is reduced because of the similar Acid Rain and NO_X SIP Call requirements. The estimates for these units are 5 hours of managerial time and 5 hours of technician time in year one and 1 hour each per year after year one.

Response to Error Messages. The Agency provides feedback to affected sources for errors that are found in monitoring plans or other reports. The Agency estimates that for each NAR-NOSIP unit, an owner or operator will spend approximately 4 hours of managerial time and 8 hours of technician time responding to these error messages each year. (The time for the other sources is accounted for in other ICRs.)

DAHS Debugging. Based on experience with the Acid Rain Program, some effort will be involved to fix problems with the DAHS software used to report in the EDR formats. This burden is assumed to fall primarily on units that are not affected under either the Acid Rain or NO_X SIP Call programs. Consistent with the existing Part 75 ICR, the Agency estimates that about 16 managerial and 88 technician hours will be spent on this task in the first year of implementation, and then 4 managerial and 12 technician hours will be required in the second and subsequent years of implementation.

Monitoring Plans. The regulations require submittal of monitoring plans. Because most of the monitoring plan elements are now part of the EDR format, the effort involved in developing and maintaining the plans are incorporated into the overall reporting burden estimate.

Monitor Certification/Recertification. Initial certification burdens and costs for new monitoring equipment are addressed above under start-up activities since these costs are often part of the overall purchase expense for the equipment. For some non Acid Rain units, however, there will be burdens associated with certifying existing monitors used under other programs for this program, as well as burdens for recertification to the extent a change in a monitoring system requires recertification. EPA estimates that approximately 10% of all 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.

Quality Assurance. Quality assurance (QA) activities and other routine maintenance for monitoring systems is the largest burden item under the CAIR 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 Acid Rain Program ICR, the existing NO_X SIP Call ICR, information provided by Acid Rain Program sources, a CEM cost model developed by EPA, and comments submitted in response to the section 110 SIP Call for ozone transport. 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 Acid Rain Program ICR, the labor burden is expected to be almost entirely technician labor.

Quarterly Reports. 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 managerial review. The existing Acid Rain program ICR was used as the basis for these estimates.

Fuel Sampling. To calculate heat input where the source is using the fuel flowmeter option for an oil or gas-fired unit, the source must obtain gross calorific value data from sampling in accordance with Appendix D of Part 75. For purposes of this ICR, it is assumed that the GCV data would be collected as part of standard business operating procedures to assure compliance with contractual specifications. Thus no additional fuel sampling burdens or costs should be incurred.

(iii) Year-end compliance certification.

Each owner or operator will have to submit an annual compliance certification report. The compliance certification is anticipated to take about two managerial hours per unit.

(iv) Allowance transaction activities.

The Agency anticipates the average number of additional allowance transactions will be approximately 2,500 per year beginning in 2009. A portion of all units will likely conduct transactions in each year solely as a result of this program. The Agency believes that each

transaction will involve about 1 hour each of managerial and technician time.

6(b) Estimating Respondent Costs

Table 6-3 presents state and local respondent annualized hours and costs for each information collection activity. To estimate annualized hours and costs for one-time and triennial activities, the burden estimate is divided by 3 to estimate the burden over a 3-year period. Table 6-4 summarizes the annual industry respondent costs. The following discussion describes how the costs were derived.

(i) Estimating Labor Costs

For this ICR, the labor rate used for technical staff at State agencies is $34.36 per hour, and the labor rate for managerial employees at State agencies is $41.63. These labor rates include benefits and overhead. These labor rates are derived from data shown on the U. S. Department of Labor, Bureau of Labor Statistics, web site at http://stats.bls.gov/news.release/ecec.toc.htm. Wage and salary rates are given in Employee Costs for Employee Compensation "Table 3. State and local government, by major occupation and industry group (March 2004)." The wage and salary rates from this table account for benefits provided to workers. When considering both technical and managerial hours, labor costs for State and Territorial agencies are estimated to be $46,000 per year per respondent, and labor costs for local agencies are estimated to be $30,000 per year per respondent for the emissions reporting requirements.

In estimating labor costs, EPA used the following amounts: $73.42 per hour for managers and $50.44 per hour for technicians. These rates were used in the existing Acid Rain Program ICR using the Bureau of Labor Statistics Employment Cost Index.

Federal Agency labor rates were assumed to be $43.44 per hour. This labor rate was derived from the federal government's 2004 General Schedule published by the U.S. Office of Personnel Management using the factors in the following table.

Determination of Federal Wage Rates		
Annual Salary of Technical Staff, GS 11 Step 3		$47,078
Annual Cost of Supervisory Staff, GS 13, step 3	$67,099	
Factor (1/11)	0.09	
		$6,039
Annual Cost of Support Staff, GS 6, step 6	$31,311	
Factor (1/8)	0.13	

		$4,070
Annual Applicable Salary of Permit Staff		$57,187
Benefits (at 16%)		$9,150
Sick Leave/ Vacation (at 10%)		$5,719
General Overhead (at 32%)		$18,300
Total Cost per FTE		$90,366
Total Hourly Cost (total per FTE dividend divided by 2,080 hours per year)		$43.44

(ii) Estimating Capital and Operations and Maintenance Costs

Emission Reporting Requirements

EPA has concluded that the Capital and Operations and Maintenance Costs estimated under the CERR and the NO_X SIP Call are sufficient to accommodate the modest changes in reporting burden for the proposed CAIR. Therefore, no estimate of Capital and Operations and Maintenance Costs were made for this ICR.

Emission Trading Requirements

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 Acid Rain and NO_X SIP Call programs, and supplemental estimates provided by affected utilities and others related to the various cost items.

The AR-SIP and AR-NOSIP units are not expected to incur any non-labor costs associated with this program. The total non-labor cost for capital/start-up items is estimated at $4,000 per unit for most AR-NOSIP units (to account for a DAHS upgrade). For NAR-SIP units, most units will require a DAHS upgrade, estimated at $4,000 per unit and an SO_2 analyzer for $42,525. For NAR-NOSIP units, the units using fuel flowmeters are expected to incur DAHS and SO_2 analyzer costs, while the other units will require some combination of a NO_X, diluent, SO_2 and/or flow CEMS. The costs for these units ranges from $15,000 to $192,000. The variance is due to the monitoring methodology used and what monitoring equipment may already be in place at the unit.

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 for 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.

The Agency also notes that this ICR does not include a cost for the purchase of monitoring equipment for all affected units. Many sources covered by the CAIR Trading Programs are already required to have CEMS under other regulatory programs. Therefore, to the extent that no new equipment is needed by these sources, capital costs are not included because those costs were included in the ICRs of those other programs. Thus, the capital and other costs included in Table 6-5, represent weighted average costs for each respondent, not the total individual cost for any particular respondent.

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

Capital costs for emissions trading 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.

(iv) Annualizing Capital Costs

The relevant capital costs for the emissions trading portion of this ICR were annualized at a rate of 7%, (i.e., the annualized capital cost was calculated assuming money to purchase the capital equipment was borrowed at a 7% annual interest rate). The cost of the loan was amortized over the life of the loan to repay original borrowed amount plus interest. The result is the annualized capital cost reported.) The annualized cost of the necessary capital purchases varies from $2,250 to $22,500, per year, per unit, depending on the type of monitoring methodology. Tables 6-5 contains a breakdown of annual costs by monitoring methodology.

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

Emission Reporting Requirements

The number of respondents is estimated to be 51 States (including DC), 4 Territories and 49 local agencies, resulting in 104 total respondents. Most of the activities detailed in Table 6-1

apply to a subset of the 104 potential respondents. The total hourly burden for all respondents is estimated to be a decrease of 1309 hours per year from the approved ICRs for the CERR and the NO_X SIP Call. During the first 3-year period that the rule is in effect, the respondents should save $135,657.

Emission Trading Requirements

The number of industry respondents varies depending on the activity in question. Activities such as title V permit application or processing allowance transfers can involve over two thousand sources. The number of sources which will be required to install a particular type of monitoring equipment will be less since many sources already have monitoring equipment especially if they are in the NO_X SIP Call region. Tables 6-1, 6-2, and 6-3 give estimates of State burden. These burdens include preparation of the SIP revision in response to the CAIR, activities associated with participating in an emissions trading programs, and reporting information to EPA under §51.122 . Table 6-5 gives estimates of industry burden beginning with the first expected monitoring year, 2009. This burden includes monitoring, reporting and other activities involved in participating in an emissions trading programs. The total number of respondents is estimated to be 1,750 facilities.

6(e) Bottom Line Burden Hours and Cost Tables

Emission Reporting Requirements

Total Estimated Respondent Burden and Cost Summary

	Number of Respondents	Number of Activities[1]	Total Hours Per Year	Total Labor Costs Per Year
State Respondents	Varies from 5 to 104	224	(1309) DECREASE	($45,219) DECREASE

[1]On average, each State respondent is assumed to perform 8 discrete activities associated with the CAIR emission reporting requirements, as indicated in Table 6-3. This total is the sum of the "Number of Respondents" column in Table 6-3.

Emission Trading Requirements

Total Estimated Respondent Burden and Cost Summary

	Number of Respondents	Total Hours Per Year	Total Costs Per Year
State Respondents	29	440	$138,683
Industry Respondents	1,750	607,216	$67,900,210

6(f) Reasons for Change in Burden

Emission Reporting Requirements

The net change in emission reporting burden as compared with the approved ICRs for the CERR and NO_X SIP Call is a decrease of 1309 hours. The change in the CAIR point source definition resulted in an increase in burden, but this change only impacted 8 respondents. By combining the reporting dates for both the CERR and the NO_X SIP Call, a burden reduction has resulted that impacts 22 respondents. The elimination of the CERR triennial requirement that States report biogenic emissions impacts 55 respondents.

Emission Trading Requirements

The large burden associated with this rule is a result of the costs of monitoring, certifying, quality assuring and reporting emissions data from large electric generating units regulated under CAIR. This burden is tempered however by the integration of these monitoring and reporting requirements with those already required under the Acid Rain and NO_X SIP Call trading programs. Otherwise, the burden would be significantly higher and the number of sources would be greater.

6(g) Burden Statement

Reporting of emissions data required by the CAIR is estimated to involve an average reduction of 8 hours per year for each State, Territorial and local air pollution control agency. Monitoring and reporting emissions under the CAIR Trading Programs is estimated to involve up to 1043 hours per year for industrial sources. This estimate considers the most hours expected for a source. With acceptable variations in monitoring methodologies, many sources will spend much less time each year meeting these requirements.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. 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 No. OAR-2003-0053, which is available for public viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 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, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at http://www.epa.gov/edocket. Use EDOCKET 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. Once 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. OAR-2003-0053 in any correspondence.

Table 6-1. Emission Reporting Requirements - State Respondent Burden Hours by Activity

Information Collection Activity	Hours Per Respondent		
	Managerial Hours	Technical Hours	Total
One-time			
Read the reporting requirements of the rule	1	1	2
Elimination of the NO_X SIP Call requirement for a special all-sources report for the year 2007 (DECREASE)	0	8	8
Annual			
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants	2	40	42
Harmonize reporting dates under the CERR and NO_X SIP Call (DECREASE)	2	40	42
Triennial			
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants	2	40	42
Harmonize reporting dates under the CERR and NO_X SIP Call (DECREASE)	2	40	42
Add AR, IO, LA, MS and WI to the NO_X SIP Call reporting requirements	1	24	25
Elemination of the CERR reporting requirement for biogenic emissions (DECREASE)	2	40	42

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Table 6-2. Emission Reporting Requirements - Activities Required by States Every Year During the Period 2006 through 2008

Information Collection Acitivity	2006	2007	2008
One-time (Annualized)			
Read the reporting requirements of the rule	✓		
Annual			
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants]	✓	✓	
Harmonize reporting dates under the CERR and NO_X SIP Call (DECREASE)	~~✓~~	✓	
Triennial			
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants			✓
Harmonize reporting dates under the CERR and NO_X SIP Call (DECREASE)			✓
Add AR, IO, LA, MS and WI to the NO_X SIP Call reporting requirements			✓
Elemination of the CERR reporting requirement for biogenic emissions (DECREASE)			✓

Table 6-3. Annual State Respondent Burden and Cost by Activity

Information Collection or Trading Rule Activity	Hours and Costs Per Respondent				Total Hours and Costs		
	Mgr. $41.63/Hr[1]	Tech. $34.36/Hr[1]	Respondent Hours/Year	Labor Cost/Year	Number of Respondents	Total Hours/Year[2]	Total Cost/Year[3]
One-time (Annualized)							
Read the reporting requirements of the rule	0.33	0.33	0.66	25.08	104	69	2608
Elimination of the NOX SIP Call requirement for a special all-sources report for the year 2007 (DECREASE)	-0.13	-2.67	-2.80	-97.15	22	-61.6	-2137
Revise SIP if necessary to obtain required reductions	50	250	300	10671.50	9	2700	96,044
Annual							
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants	1.33	26.67	28.00	971.75	8	224	7774
Harmonize reporting dates under the CERR and NOX SIP Call (DECREASE)	-1.33	-26.67	-28.00	-971.75	22	-616	-21378
Trading Program related (monitoring certifications, audits)	40	400	440.00	15,409	9	3960	138,683
Triennial							
Revised definition of a point source to conform to the definition in 40 CFR part 70 exclusive of hazardous air pollutants	0.67	13.33	14.00	485.91	8	112	3887
Harmonize reporting dates under the CERR and NOX SIP Call (DECREASE)	-0.67	-13.33	-14.00	-485.91	22	-308	-10690
Add AR, IO, LA, MS and WI to the NOX SIP Call reporting requirements	0.33	8.00	8.33	288.62	5	41.65	1443
Elimination of the CERR reporting requirement for biogenic emissions (DECREASE)	-0.67	-13.33	-14.00	-485.91	55	-770	-26725
Total	89.86	642.33	732.19	25,811.33	varies	5,351	189,508

[1] See Section 6 (b) (i) for labor and overhead rates.

[2] Hours per year are rounded to the nearest hour.

[3] Costs per year are rounded to the nearest dollar.

Table 6-4. Analysis Results of Point Source Definition Change

State	Facilities Reported to '99 NEI	Facilities Required by CERR	Facilities Required Using 40 CFR part 70
AL	989	231	301
AK	**28**	**13**	**245**
AZ	283	49	115
AR	**180**	**127**	**292**
CA	9642	261	1193
CO	4661	134	131
CT	175	36	95
DE	106	20	85
DC	**9**	**5**	**34**
FL	**1063**	**194**	**1653**
GA	**304**	**169**	**374**
HI	**84**	**36**	**128**
ID	59	41	51
IL	7843	354	723
IN	1201	305	716
IA	**67**	**60**	**294**
KS	698	230	363
KY	1829	181	315
LA	953	401	578
ME	159	41	73
MD	179	59	165
MA	2167	79	164
MI	1620	228	489
MN	833	123	329
MS	608	269	317
MO	718	124	390
MT	206	48	59
NE	635	44	133
NV	102	16	48
NH	90	27	53
NJ	717	83	405
NM	323	136	183
NY	553	151	532
NC	2307	281	415
ND	58	27	50
OH	713	261	712
OK	1047	224	376
OR	168	62	150
PA	1461	287	786
RI	77	14	49
SC	690	115	299
SD	**16**	**13**	**200**
TN	913	294	322
TX	1891	856	1532
UT	426	55	74
VT	53	13	20
VA	779	175	289
WA	318	81	129
WV	413	123	178
WI	1677	136	557
WY	186	93	152
TOTAL	***52277***	**7385**	**17316**

Table 6-5. Annual Industry Respondent Burden and Cost by Activity, 2009 and subsequent years

Information Collection Activity	Mgr. $73.42 /Hour 2009	Tech. $50.44 /Hour 2009	Respondent Hours/Year 2009	Respondent Labor Cost/Year 2009	Annual Capital/ Startup Costs 2009	O & M Cost 2009	Number of Respondents 2009	Total Hours/ Year 2009	Total Cost/Year 2009
Title V pemit application	4	0	4	$294	$0	$0	1767	7,068	$518,933
Permit to Construct Application	20	20	40	$2,477	$0	$0	93	3,720	$230,380
Startup/Capital Items									
1. AR-NOSIP									
a. DAHS modification	2	4	6	$349	$600	$0	700	4,200	$664,020
2. NAR-SIP									
a. SO2 monitor	13	3	16	$1,106	$6,379	$0	200	3,200	$1,496,956
b. DAHS modification	2	4	6	$349	$600	$0	719	4,314	$682,331
3. NAR-NOSIP									
a. NOx and Flow CEMS	24	3	27	$1,913	$22,500	$0	279	7,533	$6,811,339
b. NOx CEMS & Fuelmeter	64	10	74	$5,203	$18,750	$0	344	25,456	$8,239,928
c. App. E & Fuelmeter	20	10	30	$1,973	$2,250	$0	100	3,000	$422,280
d. SO2 monitor	10	20	30	$1,743	$6,379	$0	300	9,000	$2,436,600
EMISSIONS MONITORING									
Review Instructions and Requirements									
1. NAR-SIP	5	5	10	$619	$0	$0	719	7,190	$445,277
2. NAR-NOSIP	24	24	48	$2,973	$0	$0	724	34,752	$2,152,191
Respond to EPA Generated Error Messages									
1. NAR-NOSIP	4	8	12	$697	$0	$0	724	8,688	$504,773
Debug Computer Software									
1. NAR-SIP	1	4	5	$275	$0	$0	719	3,595	$197,854
2. NAR-NOSIP	16	88	104	$5,613	$0	$0	724	75,296	$4,064,131
Certify Existing monitors and App. E Methods									
1. NAR-NOSIP									
a. NOx and Flow CEMS	10	32	42	$2,348	$0	$2,800	28	1,176	$144,152
b. NOx CEMS & Fuelmeter	10	32	42	$2,348	$0	$2,800	34	1,428	$175,042
c. App. E	8	24	32	$1,798	$0	$10,000	10	320	$117,979
d. SO2 monitor	5	16	21	$1,174	$0	$2,800	30	630	$126,810
2. NAR-SIP									

a. SO2 monitor	5	16	21	$1,174	$0	$2,800	20	420	$84,540
Peform QA Testing and Maintenance									
1. NAR-NOSIP									
a. NOx and Flow CEMS	40	400	440	$23,113	$0	$20,800	279	122,760	$12,251,671
b. NOx CEMS & Fuelmeter	20	375	395	$20,383	$0	$17,400	344	135,880	$12,997,490
c. App. E & Fuelmeter	5	30	35	$1,880	$0	$1,800	100	3,500	$368,030
d. SO2 monitor	10	200	210	$10,822	$0	$10,400	300	63,000	$6,366,600
2. NAR-SIP									
a. SO2 monitor	10	200	210	$10,822	$0	$10,400	200	42,000	$4,244,400
Assure Data Quality, Prepare Reports (Inc. monitor plan update), Submit Reports									
1. NAR-NOSIP	16	42	58	$3,293	$0	$0	724	41,992	$2,384,277
Year End Compliance Certification	2	0	2	$147	$0	$0	1443	2,886	$211,890
Allowance Transfers	1	1	2	$124	$0	$0	2500	5,000	$309,650
TOTAL								607,216	$67,900,210