1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection
Ambient Air Quality Surveillance Siting Criteria for Open Path Analyzers--Concurrent Monitoring Requirement

1(b) Short Characterization (Abstract)

This Information Collection Request (ICR) includes ambient air monitoring activities and data reporting activities associated with a 40 C.F.R. 58 rule-making package "Ambient Air Quality Surveillance Siting Criteria for Open Path Analyzers." Part 58 is being amended to define the appropriate ambient air monitoring network design, siting, and quality assurance criteria for open path analyzers, a recently available technology, with the intention of integrating this method into the existing ambient air monitoring programs. Open path analyzers provide path-averaged ambient air pollutant concentrations. In contrast, a traditionally-used point analyzer measures ambient air pollutant concentrations at a discrete point by extracting an air sample from the atmosphere through an inlet probe.

Due to this fundamental difference in measurement principles of open path and point analyzers, there will be tradeoffs in using each type of instrument for certain applications. Because of the ability of open path analyzers to measure pollutant concentrations over a path, these new techniques are expected to provide better spatial coverage, and thereby a better assessment of a general population's exposure to air pollutants for some applications. However, due to this same path-averaging characteristic, open path analyzers could underestimate high pollutant concentrations at specific points within the measurement path for situations with spatially variable pollutant gradients. To take advantage of both types of ambient air methods, this rule will provide the affected State/local/tribal air quality management agencies with the flexibility of using either technique within their ambient air monitoring programs, provided that they follow the network design, siting, and quality assurance criteria defined with this same rule.

A portion of the rule associated with this ICR contains provisions for concurrent monitoring. Concurrent monitoring is the practice of operating both a traditional point analyzer and a new open path analyzer in the same location for a limited duration in order to assess if, and how, the data collected by the two different measurement techniques might affect local air quality management program decisions. The concurrent monitoring requirement would be in effect when a State/local/tribal agency decides to replace an existing point analyzer with an open path analyzer at an ambient air monitoring site where significant regulatory impacts have been realized, such as a site used in a nonattainment designation for a National Ambient Air Quality Standard. Concurrent monitoring would not apply to situations where a new ambient air monitoring site is established or to sites where no significant regulatory action has occurred. Waivers from the concurrent monitoring requirement are provided within the regulation for situations involving unavoidable logistical problems in operating a monitoring site, or where technical analyses indicate no need for concurrent monitoring.
Concurrent monitoring data would be provided to the EPA by the State/local agencies conducting the ambient air monitoring program. This data would include ozone, carbon monoxide, and/or sulfur dioxide ambient air concentration data and any associated quality assurance information. The State/local agencies and the EPA Regional Offices will use this data to review the adequacy of the subject ambient air monitoring network design and to recommend improvements as necessary to these networks. In accordance with previously established regulation, this concurrent monitoring data will be submitted to and stored electronically within the EPA’s Aerometric Information Retrieval System, Air Quality Subsystem. This Information Collection is estimated to involve 10 respondents at $140,250.

2. **NEED FOR AND USE OF THE COLLECTION**

2(a) Need/Authority for the Collection
The information requirements included within this ICR are necessary to ensure that the ambient air monitoring methods used to assess the nation’s air quality are appropriately implemented. The design of each ambient air monitoring network must be carefully evaluated using an appropriate combination of technical tools, including concurrent monitoring. The impetus for these examinations of the monitoring networks’ adequacy stems from various factors including the recognition that new and refined techniques for collecting ambient air data are continually emerging and available for application within our well-established programs. In the case of using open path analyzers to replace existing point analyzers in situations where significant regulatory activity has resulted, we are using concurrent monitoring to smooth the transition between the new and older technologies. The legal authority for this requirement is the Ambient Air Quality Surveillance Regulation, 40 C.F.R. §§ 58.20, 58.21, 58.25, 58.30, 58.31, and 58.36 (See Attachment 2).

2(b) Practical Utility/Users of the Data
The Office of Air Quality Planning and Standards uses ambient air monitoring data to determine attainment or nonattainment with the National Ambient Air Quality Standards, to assist in developing necessary control strategies to ensure attainment, to assess national trends in air pollution, to determine ambient concentrations of an air pollutant, and to determine a population's exposure to a particular ambient air pollutant. With so many significant activities tied to the quality of our ambient air data, the 40 C.F.R. 58 regulations must preserve the quality of the ambient air monitoring programs. Concurrent monitoring is one tool that will help with this task by providing data to be used to assess the adequacy of a particular monitoring site and any variations on measured air quality due to changed in measurement methodology. During a period of concurrent performance of both open path and point analyzers, the EPA will use data from both to compare with established National Ambient Air Quality Standards. The collection of concurrent monitoring data is necessary for the proper performance of the functions of the Agency, and the information collected will have practical utility as a data analysis tool.

3. **THE RESPONDENTS AND THE INFORMATION REQUESTED**

3(a) Respondents/SIC Codes
This information request will affect State, local, and tribal governments (#951) that are currently operating and maintaining established ambient air quality networks.

3(b) Information Requested
(i) Data Items, Including Recordkeeping Requirements
Report on these data items to be submitted to and stored within the U.S. EPA’s Aerometric Information
(ii) Respondent Activities
A model respondent would engage in the following activities to comply with this information request:

- Read the 40 C.F.R. 58, Appendix D provisions for concurrent monitoring.
- Continue to maintain and operate an existing point analyzer for a minimum of one year of concurrent monitoring.
- Gather hourly ambient air pollutant concentration data electronically.
- Review the hourly ambient air data for quality assurance considerations.
- Submit the hourly ambient air data to the AIRS-AQS data repository.
- During and after the period of concurrent monitoring, review the data with assistance from the EPA Regional Office to evaluate the methodology used at the site and any other quality assurance issues that arise during this time.

Each of these activities will be conducted using existing reporting and recordkeeping practices, including electronic submittal to the AIRS-AQS. Modifications to these existing practices are not necessary for this collection.

4. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

4(a) Agency Activities
The Agency will review the concurrent monitoring data AIRS-AQS submissions, assist with these submittals as necessary, and answer respondent questions.

4(b) Collection Methodology and Management
All State/local/tribal ambient air monitoring networks, including those affected by concurrent monitoring, have access to and use well-established quality assurance procedures as outline in the Quality Assurance Handbook for Air Pollution Measurement Systems, Volumes I and II, EPA/600/R-94/038a & b, April 1994. These documents ensure that all ambient air quality data are accurate and reliable.

The EPA has provided and will continue to provide resources for the maintenance and operation of the AIRS-AQS national data repository. All data, including that required by this collection, are submitted electronically to reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. In submitting ambient air data into the AIRS-AQS national repository, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State/local/tribal agencies and the EPA have been submitting data to this system since its inception in 1987.

4(c) Small Entity Flexibility
Small entities and small businesses are not expected to be impacted by this collection requirement. In consideration of all affected entities, the rule associated with this ICR provides waiver provisions from part or all of these concurrent monitoring requirements for cases where concurrent monitoring is not possible or is not
technically necessary. The rule also allows for variations in the time period that a State/local agency would conduct concurrent monitoring.

4(d) Collection Schedule
Data generated by concurrent monitoring would be submitted with all other ambient air monitoring data according to the schedule defined in 40 C.F.R. §§ 58.28 and 58.35. (See Attachment 2.) This current regulation includes quarterly data reporting periods.

5. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) Nonduplication
This collection is not unnecessarily duplicative of information otherwise reasonably accessible to the agency.

5(b) Consultations
The State Air Monitoring Work Group, a subgroup of the State and Territorial Air Pollution Program Administrators/Association of Local Air Pollution Control Officers (STAPPA/ALAPCO), was provided with general information on open path monitoring and the 40 C.F.R. 58 rule-making package. The main concern expressed by these State/local representatives was what, if any, impact would be realized when the open path technology is introduced into existing ambient air programs. Concurrent monitoring should help alleviate many of these concerns since it will help with the transition between established point analyzer technology and open path technology.

5(c) Effects of Less Frequent Collection
The data collected via concurrent monitoring would be submitted by the State/local/tribal air quality management agencies to the AIRS-AQS data repository on the same schedule as all other ambient air quality data. We believe that maintaining the same quarterly reporting schedule for concurrent monitoring as we do for all other data reporting would be less burdensome to State/local agencies than if we established a different schedule, even if that different schedule were on a less frequent basis than quarterly.

5(d) General Guidelines
This section does not apply. This ICR does not violate the OMB's general guidelines for information collections.

5(e) Confidentiality and Sensitive Questions
(i) Confidentiality
This section does not apply.

(ii) Sensitive Questions
This section does not apply.
6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a-b) Estimating Respondent Burden and Costs
We estimated the burden hours based on current costs for operating and maintaining an ambient air quality monitoring station as detailed in "Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants”, EPA-454/R-93-042, October 1993.

Worksheet 1: Annual Respondent Burden/Cost Estimates

<table>
<thead>
<tr>
<th>Collection Activities</th>
<th>Burden Level</th>
<th>Hours (Hour(s))</th>
<th>Annual Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Read the 40 C.F.R. 58, Appendix D requirements</td>
<td>PRO3</td>
<td>32</td>
<td>$1,728</td>
</tr>
<tr>
<td>2. Operate &amp; maintain existing point analyzer for a minimum of 1 year of concurrent monitoring. Includes site visits, maintenance, quality assurance audits &amp; calibrations, QA coordination, training, plan update, and procurement of supplies. See Attachment 2.</td>
<td>PRO3, PRO2, PRO1, TEC2</td>
<td>12, 42, 8, 114</td>
<td>$648, $1,905, $311, $4,064</td>
</tr>
<tr>
<td>3. Gather hourly ambient air pollutant concentration data electronically.</td>
<td>PRO1</td>
<td>26</td>
<td>$1,011</td>
</tr>
<tr>
<td>4. Review the hourly ambient air pollutant concentration data for quality assurance purposes.</td>
<td>PRO2</td>
<td>34</td>
<td>$1,542</td>
</tr>
<tr>
<td>5. Submit the hourly data to AIRS-AQS.*</td>
<td>PRO2</td>
<td>24</td>
<td>$1,088</td>
</tr>
<tr>
<td>6. Review the data with EPA to evaluate methodology.</td>
<td>PRO3</td>
<td>32</td>
<td>$1,728</td>
</tr>
<tr>
<td>TOTALS</td>
<td></td>
<td>324</td>
<td>$14,025</td>
</tr>
</tbody>
</table>

*Annual Recordkeeping Burden: Hr. Total (24) x No. of Res.(10) = 240 hours.
Annual Reporting Burden: Hr. Total (300) x No. of Res. (10) = 3000 hours.
Annual Burden: Hr. Total (324) x No. of Res. (10) = 3240 hours.
Annual Cost: Cost Total ($14,025) x No. of Res. (10) = $140,250
**Explanation of Labor Rates and Categories**

<table>
<thead>
<tr>
<th>Professional/Technical Level</th>
<th>Labor Rate in 1995 dollars ($/hour)</th>
<th>Loaded Labor Rate ($/hour) (Includes benefits &amp; overhead costs, using a 2.5 factor, 1995 dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Junior Technician (TEC1)</td>
<td>12.96</td>
<td>32.40</td>
</tr>
<tr>
<td>Senior Technician (TEC2)</td>
<td>14.26</td>
<td>35.65</td>
</tr>
<tr>
<td>Junior Professional (PRO1)</td>
<td>15.55</td>
<td>38.88</td>
</tr>
<tr>
<td>Mid-level Professional (PRO2)</td>
<td>18.14</td>
<td>45.35</td>
</tr>
<tr>
<td>Staff Professional (PRO3)</td>
<td>21.60</td>
<td>54.00</td>
</tr>
<tr>
<td>Senior Professional (PRO4)</td>
<td>28.51</td>
<td>71.28</td>
</tr>
</tbody>
</table>


6(c and d) Estimating Agency Burden and Cost

**Worksheet 2: Annual Agency Burden/Cost Estimates**

<table>
<thead>
<tr>
<th>Collection Activities</th>
<th>Burden Level</th>
<th>Hours</th>
<th>Annual Cost¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Review the concurrent monitoring data.</td>
<td>GS-13</td>
<td>10</td>
<td>$403</td>
</tr>
<tr>
<td>2. Answer respondent questions...</td>
<td>GS-13</td>
<td>8</td>
<td>$322</td>
</tr>
<tr>
<td>Agency Total Annual Burden and Cost</td>
<td></td>
<td>18</td>
<td>$725</td>
</tr>
</tbody>
</table>

¹*GS rates are subject to some variation due to locality pay differences. The cost above is based on an estimated pay rate of $52,396 for a GS-13.*

6(e) Reasons for Change in Burden

Since our last clearance, we have decided to revise and update the ambient air monitoring regulations to incorporate open path analyzer concurrent monitoring requirements. We have added a 324 hour annual burden for each of 10 expected respondents. This is a program change.

6(f) Burden Statement

Form Approved
OMB Control No. 2060-0084
Approval Expires __/__/__

The public reporting burden for this collection of information is estimated to average 300 hours per response, and to require 24 hours recordkeeping. This estimate includes the time needed for review of the associated regulation, operating and maintaining an ambient air monitor, gathering and processing data, quality assurance considerations, submitting the data to AIRS-AQS, and reviewing the data. 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.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Chief, Information Policy Branch, PM-223Y, U. S.
Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street N.W., Washington, D.C. 20503.