

**INFORMATION COLLECTION REQUEST
FOR THE 40 CFR PART 64
COMPLIANCE ASSURANCE
MONITORING PROGRAM**

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(For OMB Review)

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE OF THE INFORMATION COLLECTION

This document fulfills the Agency's requirements under the Paperwork Reduction Act (PRA) with regards to determining the regulatory burden associated with the promulgation of the Compliance Assurance Monitoring (CAM) Rule, to be codified at 40 CFR part 64. It has been assigned EPA tracking number 1663.02. The title of this Information Collection Request (ICR) is "Information Collection Request for the 40 CFR Part 64 Compliance Assurance Monitoring Program"

1(b) ABSTRACT EXECUTIVE SUMMARY

Part 64 of the Code of Federal Regulations (CFR), as defined in the CAM Rule, requires monitoring, compliance certification, periodic reporting, and recordkeeping information collections by owners and operators of title V sources [57 Fed. Reg. 32250-32312] (1992) (codified at 40 C.F.R. part 70)¹ with controlled pollutant specific emissions units that have a pre-control potential to emit major amounts of regulated air pollutants.

CAM identifies two categories of emission units:

- **"Large" pollutant specific emission units:** units that have the potential to emit, with controls, the applicable regulated air pollutant in an amount equal to or greater than the amount required for a source to be classified as a major source, and
- **"Other" pollutant specific emission units:** the set of remaining affected pollutant specific emission units

This analysis differentiates between these two types of units because they are subject to somewhat different monitoring requirements (e.g., monitoring frequency requirements) and implementation timetables under part 64.

Upon approval by the permitting authority (PA) of the monitoring proposed by the source, sources use the approved monitoring method to collect data. These data provide the basis on which owners or operators can certify, in accordance with the requirements of the operating permit program, the compliance of their emissions units with the applicable requirements. In addition, these data provide the basis on which owners or operators submit monitoring reports on no less than a semi-annual basis. Consistent with the recordkeeping period established in the operating permit program, CAM requires sources to store and maintain these data for at least five years.

In the first three years following promulgation, the information collection and capital investment requirements of the CAM program will involve only some of the affected pollutant points. When fully implemented, the Agency estimates the CAM program will involve approximately 9,000 facilities,

¹ For purposes of simplicity, this ICR applies the terms "owners and operators", "firm", and "sources" interchangeably. References to actions or responsibilities of sources or firms should be interpreted as referring to the owners and operators of that source or firm.

covering 27,000 emissions units. This ICR estimates the annualized costs of the CAM Rule over the first three years following promulgation at \$7.9 million (1995 dollars), and the annual average labor burden of CAM over the first three years following promulgation at 148 thousand hours. The activities at sources leading to these impacts include:

- Determination of a monitoring approach;
- Installation and operation of monitoring equipment, if necessary;
- Administrative burden for recordkeeping and reporting;
- Upgraded operating/maintenance activities;
- Improved quality assurance; and
- Permit fees to cover regulatory costs of the program.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED/AUTHORITY FOR THE COLLECTION

EPA decisions in both the operating permit and CAM programs require this information. The operating permit program requires owners or operators of units that emit air pollutants to submit annual compliance certifications, to submit monitoring results at least semiannually, and to report deviations promptly, but no implementation guidance is provided within the operating permit program. CAM provides the language to implement these requirements of the operating permits program in a cost-effective manner.

CAM rule development began in 1991 under the name enhanced monitoring. The Agency first provided notice of enhanced monitoring in the Federal Register of August 1991. That notice described an approach which addressed the requirement in title VII of the Clean Air Act Amendments of 1990 that the EPA promulgate enhanced monitoring and compliance certification requirements for major sources, and the related requirement in title V that operating permits include monitoring, compliance certification, reporting and recordkeeping provisions to assure compliance. The 1997 part 64 Draft rule represents the most recent effort to respond to these requirements.

The Clean Air Act (Act) Amendments of 1990, Public Law 101-549, enacted on November 15, 1990, establish the legal authority for this information collection. Section 502(b) directs EPA to promulgate regulations that will require the owners or operators of certain stationary sources of air pollution to conduct monitoring and to make compliance certifications. These provisions are set forth in both title V (operating permits provisions) and title VII (enforcement provisions) of the 1990 Amendments.

Title V directs the Agency to implement monitoring and compliance certification requirements through the operating permits program. Section 503(b)(2) requires at least annual certifications of compliance with permit requirements and prompt reporting of deviations from permit requirements. Section 504(a) mandates that owners or operators submit to the PA the results of any required monitoring at least every six months. This section also requires permits to include “such other

conditions as are necessary to assure compliance with applicable requirements” of the Act. Section 504(b) of the Act also allows the Agency to prescribe, by rule, methods and procedures for determining compliance, and states that continuous emission monitoring systems need not be required if other methods or procedures provide sufficiently reliable and timely information for determining compliance. Under section 504(c), each operating permit must “set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.”

Title VII of the 1990 Amendments added a new section 114(a)(3) that requires EPA to promulgate rules on enhanced monitoring and compliance certifications. This paragraph provided, in part:

“The Administrator shall in the case of any person which is the owner or operator of a major stationary source, and may, in the case of any other person, require enhanced monitoring and submission of compliance certifications. Compliance certifications shall include (A) identification of the applicable requirement that is the basis of the certification, (B) the method used for determining the compliance status of the source, (C) the compliance status, (D) whether compliance is continuous or intermittent, (E) such other facts as the Administrator may require.”

The 1990 Amendments also revised section 114(a)(1) of the Act to provide additional authority concerning monitoring, reporting, and recordkeeping requirements. As amended, that section provides the Administrator with the authority to require any owner or operator of a source, on a one-time, periodic or continuous basis to:

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with section 114(a)(3); and
- (G) provide such other information as the Administrator may reasonably require.

Obtaining ongoing compliance is a two-step process. First, the Agency must assure properly designed control measures are installed or otherwise employed. These measures include control devices, process modifications, operating limitations and other control measures as applicable. Furthermore, the Agency must assure the control measures are proven to be capable of achieving applicable requirements. In the past, this step has been addressed through new source review permitting, initial stack testing, compliance inspections and similar mechanisms. The title V permit

application and review process, including the applicant's initial compliance certification and compliance plan obligations, will add another tool for assuring that source owners or operators have adopted proper control measures for achieving compliance.

The second step involves monitoring by sources to determine continued assurance that the source's control measures, once installed or otherwise employed, are properly operated and maintained so that they do not deteriorate to the point where the owner or operator fails to remain in compliance with applicable requirements. The Agency believes that monitoring, reporting, recordkeeping and ongoing or recurring compliance certification requirements under titles V and VII should be designed so that owners or operators carry out this second step in assuring ongoing compliance. The Agency has adopted the CAM approach to assure the proper operation and maintenance of control measures employed by sources. CAM establishes monitoring to:

- (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements;
- (2) indicating any excursions from these ranges; and
- (3) responding to the data so that excursions are corrected.

This type of monitoring is an appropriate approach to enhanced monitoring in the context of title V permitting for significant emission units that use control devices to achieve compliance with emission limits. In particular, CAM

- 1) provides cost-effective achievement of air pollution emission reductions;
- 2) establishes voluntary compliance and self-certification by owners or operators; and
- 3) holds owners or operators accountable for regulated air pollutants emitted by units.

2(b) USE/USERS OF THE DATA

Owners or operators of affected emissions units will use the information as the basis for the compliance certification required by the operating permit program, and as the basis for compliance assurance monitoring reports. Sources will also use the information to determine and maintain the efficiency of process or emissions control devices.

PAs will use the information collected and submitted in permit applications in determining acceptability of proposed compliance assurance monitoring. The PAs will use source monitoring data to assess compliance, as input into reports to other agencies, and, when necessary, as evidence in enforcement proceedings. PAs will use the information on excursions and exceedances collected from owners or operators to require the development and implementation by source operators of a Quality Improvement Plan (QIP). The QIP will address the timetable, methods, and procedures for dealing with these excursions and exceedances.

PAs will also collect summaries of information on compliance and will review the information as part of their permitting responsibilities and ongoing compliance activities. The information may be entered into local, regional, or national databases for review and action by air pollution control agencies. Other Federal entities, such as the Department of Energy, may request and use the information collected to fulfill specific mission objectives. Citizens may request the information collected in order to determine the compliance status of any emissions unit or particular group of emissions units.

3. THE RESPONDENTS AND THE INFORMATION REQUESTED

3(a) RESPONDENTS / SIC CODES

CAM applies to most Standard Industrial Classification (SIC) code groups and to certain service industries regulated under the Act.

3(b) INFORMATION REQUESTED

3(b)(i) DATA ITEMS

The following matrices display the types of additional data required by the part 64 CAM Rule, along with the location of the requirement in the rule.

**FIGURE 3-1
DATA REQUIRED BY THE INFORMATION COLLECTION**

Additional Requirements for Permit Applications	Regulation Reference
For all major source pollutant-specific emission units that satisfy the applicability criteria outlined in 64.2, the owner or operator shall submit a proposed monitoring approach to the PA. The monitoring approach shall be submitted as part of the initial, revised, or renewed part 70 or 71 permit application.	64.5

Consistent with the design requirements in 64.3, the submission shall include the following information:

the indicators to be monitored to satisfy 64.3(a)(1)-(2).	64.4(a)(1)
either (i) the ranges or designated conditions for such indicators or (ii) the process by which such indicator ranges or designated conditions shall be established.	64.4(a)(2)

Additional Requirements for Permit Applications	Regulation Reference
the performance criteria for the monitoring to satisfy 64.3(b).	64.4(a)(3)
if applicable, the indicator ranges and performance criteria for a CEMS, COMS, or PEMS pursuant to 64.3(d).	64.4(a)(4)

As part of the information submitted, the owner or operator shall submit:

a justification for the proposed elements of monitoring. The justification shall include any supporting data and may refer to any generally available sources of information such as air pollution engineering manuals or EPA or PA publications. In addition, the owner or operator may base the required justification exclusively on the regulatory precedents cited in 64.4(b)(1)-(5). If the performance specifications proposed to satisfy 64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences.	64.4(b)
control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of applicable compliance or performance tests. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges.	64.4(c)(1)
documentation to certify that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place.	64.4(c)(2)

If existing data from unit-specific compliance or performance testing specified in 64.4(c) are not available, the owner or operator:

shall submit a test plan and schedule for obtaining such data; or	64.4(d)(1)
may submit indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in 64.3(a).	64.4(d)(2)

If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use for the purposes of part 64, the owner or operator shall include:

an implementation plan and	64.4(e)
schedule for installing, testing, and performing any other appropriate activities prior to the use of the monitoring.	64.4(e)

Reporting Requirements	Regulation Reference
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Submit monitoring reports in accordance with 70.6(a)(3)(iii). In addition the monitoring report shall include:

summary information of the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances and the corrective actions taken.	64.9(a)(2)(i)
summary information of the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).	64.9(a)(2)(ii)
a description of the actions taken to implement a quality improvement plan (QIP) specified in 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	64.9(a)(2)(iii)

Recordkeeping Requirements	Regulation Reference
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Records shall be maintained in accordance with the requirements specified in 70.6(a)(3)(ii). In addition the records shall include:

records of monitoring data	64.9(b)
monitor performance data	64.9(b)
any written QIP required pursuant to 64.8	64.9(b)
any corrective actions taken to implement a QIP	64.9(b)
data used to document the adequacy of monitoring	64.9(b)
records of monitoring maintenance.	64.9(b)

Additional Requirements for Compliance Certification	Regulation Reference
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For all affected pollutant-specific units, an annual compliance certification is required. As part of the compliance certification, it is necessary to identify:

each term or condition of the permit that is the basis of the certification.	70.6(c)(5)(iii)(A)
the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or means provide continuous or intermittent data.	70.6(c)(5)(iii)(B)
the status of compliance with the terms and conditions of the permit for the period covered by the certification	70.6(c)(5)(iii)(C)
such other facts as the PA may require.	70.6(c)(5)(iii)(D)

3(b)(ii) RESPONDENT ACTIVITIES

The following list displays typical activities sources will have to perform to meet the additional permit application, recordkeeping, and reporting requirements of CAM:

1. Review requirements;
2. Determine monitoring approach;
3. Specify monitoring plan elements;
4. Prepare documentation;
5. Revise CAM, as applicable;
6. Renew CAM at permit renewal;
7. Maintain records;
8. Submit reports;
9. Certify facility compliance.

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

4(a) AGENCY ACTIVITIES

State and local agencies will perform the following activities:

1. Rule familiarization;

2. Determine applicability;
3. Review and approve/disapprove monitoring chosen by owners/operators;
4. Respond to requests for reviews/revisions to CAM;
5. Review reports;
6. Evaluate CAM renewals;
7. Review annual facility certifications.

The EPA will perform the following activities:

1. Provide oversight and guidance to State and local agencies;
2. Assess requests for alternative monitoring.

4(b) COLLECTION METHODOLOGY AND MANAGEMENT

CAM does not mandate the use of standardized forms for reporting information. §64.9(b)(2) allows recordkeeping in a variety of media as long as all records are available for inspection and there are no conflicts with other recordkeeping requirements. CAM data has the same scope as, and will be collected in accordance with, the submission processes established under the part 70 Operating Permits guidance.

4(c) SMALL ENTITY FLEXIBILITY

The Agency has assessed the impacts of the CAM Rule on small businesses, governments, and organizations in Chapter V of the rule's Regulatory Impact Analysis. This assessment indicates the draft CAM Rule will probably not have a significant impact on a substantial number of small entities (SISNOSE). This conclusion is not unexpected since part 64 only affects "major sources" of air pollution. Within most industrial categories, there is a direct relationship among the size of a facility, the number of employees, and the magnitude of emissions. These associations are used in the analysis of the potential small business impacts of CAM, as well as government- and organization-owned facilities that tend to emit relatively small amounts of air pollution. Most of these facilities are hospitals, schools or other facilities that primarily emit air pollution from boilers used for heat and/or steam. Sources of this type which serve smaller populations would tend not to emit enough pollution to qualify as major sources and would not be subject to CAM requirements. For example, analysis of the database created for the CAM economic analysis confirms that major State academic institutions are represented whereas small institutions, such as junior colleges are not. Municipal power plants appear to be an exception to this trend, where even relatively small power plants can be classified as major sources of air pollution. The CAM Rule contains an exemption to help mitigate the impact on these sources. These effects will be more fully discussed in the presentation below. Due to data constraints which

affect the methodological approach, separate sections address small business impacts and small governments/organizations.

4(c)(i) MEASURES TO AVERT IMPACTS ON SMALL ENTITIES

The Agency determined the benefits of additional monitoring requirements on small sources of pollution would not justify the additional cost incurred to achieve them. Section 502(a) of the Act allows that: “The Administrator, may, in the Administrator’s discretion and consistent with the applicable provisions of [the Clean Air Act], promulgate regulations to exempt one or more source categories (in whole or in part) from the requirements of title V if the Administrator finds that compliance with such requirements is impracticable, infeasible, or unnecessarily burdensome on such categories, except that the Administrator may not exempt any major source from such requirements.” Acting under this authority, the Agency exercised its discretionary authority and determined the current level of monitoring performed by small sources of pollution is sufficient to fulfill the requirements of part 64, and decided to not subject these small sources of pollution to part 64 monitoring.

4(c)(ii) MEASURES TO MITIGATE IMPACTS ON SMALL ENTITIES

The impact of permitting costs on small firms can be mitigated in three ways. First, net costs can be reduced through the use of small business stationary source technical and environmental compliance assistance programs as called for in section 507 of the Act (at the Federal and State levels). These programs may alleviate a part of the economic burden on small sources by establishing: 1) programs to assist small businesses with determining what Act requirements apply to their sources and when they apply, and 2) guidance on alternative technologies and pollution prevention practices for small businesses.

Second, the Agency can defer applicability for one or several source categories. Small sources can benefit from deferral because they: 1) pay for installation, operation, and maintenance with cheaper (future year) dollars, and 2) will not be required to obtain a part 70 permit just to fulfill part 64 requirements.

Third, mitigation can be achieved by discretion of the Federal government. So long as the sources can ensure no net loss of environmental quality, the Agency can assess different requirements for different pollution sources based upon different source characteristics. By imposing different requirements on different source categories, those categories that are small business dominated could pay less per ton, with the balance being absorbed by other categories which are primarily large business dominated.

The Agency employed each of the above strategies to minimize the additional cost imposed on small entities. Further discussion of each can be found in the CAM Rule RIA.

4(d) COLLECTION SCHEDULE

Submission of initial source information required under part 64 depends on whether the unit is classified as “Large” or “Other.” If the source’s permit application has not been filed, is being revised, or is not complete, “Large” units must submit monitoring information on or before the 180th day after publication of the final rule in the Federal Register. If these conditions are not met, sources must submit monitoring design criteria at the first significant permit revision, or at permit renewal, whichever occurs first. For all other pollutant-specific emission units subject to part 64 (i.e., “Other” units), the owner or operator shall submit the required information upon renewal of a part 70 or 71 permit.

Upon approval of the permit, sources must collect the information specified in their permits in accordance with the collection frequency specified, maintaining these data for at least five years. Sources must also submit semi-annual monitoring reports and annual compliance certifications.

4(e) ENVIRONMENTAL JUSTICE CONSIDERATIONS

The President’s priorities in promoting environmental justice are contained in Executive Order #12898. In and of themselves, monitoring and enforcement requirements do not provide many opportunities for identifying potential environmental justice concerns. The greatest opportunity for insuring and promoting environmental justice under the CAM Rule actually occur under part 70 and 71, which provide the framework for public participation and empowerment.

5. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) NONDUPLICATION

For approval of a proposed ICR, the Agency must ensure that it has taken every reasonable step to avoid duplication in its paperwork requirements in accordance with 5 CFR 1320.9. The proposed part 64 rulemaking is mandated by the Act, and supports the title V permit program under 40 CFR part 70 as well as title VII enforcement provisions. Recognizing that many sources have already implemented monitoring strategies to fulfill their part 70 requirements, the part 64 monitoring guidelines were carefully crafted by the Agency and OMB to minimize any unnecessary duplication. The part 64 CAM Rule has also been carefully designed to function, as much as possible, in a manner complementary to that of the part 70 operating permit program managed by PAs.

5(b) CONSULTATIONS

The Agency established a workgroup to discuss and review CAM requirements. The workgroup reviewed extensive public input concerning the development of CAM, extending back to the Enhanced Monitoring and Compliance Certification Rule of October, 1993. For example, a public meeting was held on August 22, 1991 (56 FR 37700-01) to explain the scope and impact of an enhanced monitoring program. As a result of the public meeting, environmental and industry groups provided comments which eventually led to a subsequent public meeting in August 1993, with a proposed rule published October 22, 1993 (58 FR 54648).

During the public comment period following proposal, the Agency received approximately 2,000 comment letters. These letters contained several thousand individual comments on more than 500 major and minor issue topics. Because of some of the complex and difficult issues raised, the Agency held a series of stakeholder meetings in the fall of 1994, released draft sections of a possible final rule, and then officially reopened the public comment period on specific issues on December 28, 1994 (59 FR 66844). An additional stakeholder meeting was held near the close of that reopened comment period, and more than 200 additional comment letters were received.

In April 1995, EPA decided to shift the emphasis of part 64 and issued a press release that indicated the EPA's intent to hold a public meeting to discuss the potential changes to the proposed enhanced monitoring rule. The Agency then contacted various stakeholder groups so that they would have the opportunity to participate. A formal notice of the meeting was also published in the *Federal Register* on May 26, 1995 (60 FR 27943). Approximately 200 people attended the meeting on May 31, 1995, and many additional people attended the follow-up meetings held in June 1995 in Washington, DC; Cincinnati; Dallas; and Portland, Oregon. The Agency then drafted a CAM preamble and rule for public discussion and comment and held another public meeting in September 1995. (See 60 FR 48679, September 20, 1995, for the formal *Federal Register* notice of that meeting and request for comment.) Approximately 150 people attended that meeting, and the EPA received more than 60 written comment letters on the draft rule package. The Agency subsequently issued a draft final part 64 and discussion document in August 1996 and held another public meeting in September 1996. Approximately 200 people attended and 120 written comment letters were submitted during the comment period. The Agency also has held numerous informal stakeholder discussions with interested parties to discuss the CAM approach, and received additional written comments during the period since April 1996.

In April 1997, EPA released a draft Regulatory Flexibility Analysis with supporting cost documentation and solicited public comment. Following this release, EPA revised the CAM rule and prepared the 1997 part 64 Draft rule. It is this version of CAM that is the focus of this Information Collection Request.

5(c) EFFECTS OF LESS FREQUENT COLLECTION

As part of the permit application required under the operating permit program, an owner or operator must submit to the PA monitoring that satisfies the design requirements in §64.3. In addition, it must be demonstrated that the proposed monitoring is sufficient to provide compliance status

information. Without such information, PAs will be unable to issue complete permits. Furthermore, owners or operators will be unable to certify compliance with emissions limitations or standards unless costly reference test methods are employed. Part 64 requires semi-annual reports because the statute requires all monitoring reports to be submitted at least semiannually (section 504(a)). In addition, without timely evaluation of the reports, excess emissions of regulated air pollutants could rise. Consequently, less frequent collection of monitoring information is not permissible under the statute and could result in a net loss of environmental quality and was not considered for this rulemaking.

5(d) GENERAL GUIDELINES

OMB's general guidelines for information collections must be adhered to by all Federal Agencies for approval of any rulemaking's collection methodology. In accordance with the requirements of 5 CFR 1320.5, the Agency believes:

1. The part 64 regulations do not require periodic reporting more frequently than semi-annually.
2. The part 64 regulations do not require respondents to participate in any statistical survey.
3. Written responses to Agency inquiries are not required to be submitted in less than thirty days.
4. Special consideration has been given in the design of part 64 to ensure that the requirements are, to the greatest extent possible, the same for Federal requirements and those permitting authorities who already have monitoring programs in place.
5. Confidential, proprietary, and trade secret information necessary for the completeness of the respondent's permit are protected from disclosure under the requirements of §503(e) and §114(c) of the Act.
6. The part 64 regulations do not require more than one original and two copies of the permit application, update, or revision to be submitted to the Agency.
7. Respondents do not receive remuneration for the preparation of reports required by the Act or part 64.
8. To the greatest extent possible, the Agency has taken advantage of automated methods of reporting.
9. The Agency believes the impact of part 64 on small entities to be insignificant and not disproportionate.

The recordkeeping and reporting requirements contained in the proposed CAM program regulations do not exceed any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.5, except for the guideline which limits retention of records by respondents to three years. The CAM program and the operating permit program require both respondents and State or local agencies to retain records for a period of five years. The justification for this exception is found in 28 U.S.C. 2462, which specifies five years as the general statute of limitations for Federal claims in response to violations by regulated entities. The decision in U.S. v. Conoco, Inc., No. 83-1916-E (W.D. Okla., January 23, 1984) found that the five year general statute of limitations applied to the Clean Air Act.

5(e) CONFIDENTIALITY AND SENSITIVE QUESTIONS

5(e)(i) CONFIDENTIALITY

Confidentiality is not an issue for this rulemaking. In accordance with the Clean Air Act Amendments of 1990, the monitoring information to be submitted by sources as a part of their permit application and update; applications for revisions and renewals is a matter of public record. To the extent that the information required is proprietary, confidential, or of a nature that could impair the ability of the source to maintain its market position, that information is collected and handled subject to the requirements of §503(e) and §114(c) of the Act. Information received and identified by owners or operators as confidential business information (CBI) and approved as CBI by EPA, in accordance with Title 40, Chapter 1, Part 2, Subpart B, shall be maintained appropriately (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

5(e)(ii) SENSITIVE QUESTIONS

The consideration of sensitive questions, (i.e., sexual, religious, personal or other private matters), is not applicable to this rulemaking. The information gathered for purposes of establishing an operating permit for a source do not include personal data on any owner or operator.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section discusses the development of burden estimates and their conversion estimates into costs, which are separated into burden costs and capital and O&M costs. According to the latest guidance for ICRs (EPA 1995), capital and O&M costs display the cost of any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes. For example, if a source had to purchase a new mini-computer to store and manipulate

CEM data, that computer would be a cost of administration subject to reporting in the ICR. In addition, the latest guidance instructs the Agency to differentiate the burden associated with a source's labor and that which it hires through outside contractors. To the extent a source contracts out for administrative purposes (e.g., employing consultants to perform monitoring functions), the burden associated with those contracted tasks are not a burden to the source - they are a cost. Because the Agency began gathering data for this analysis before the development of the new ICR guidance, it did not anticipate a need to differentiate between source and contractor burden. Consequently, the Agency believes an adjustment of the burden and costs associated with the CAM Rule is beyond the scope of this analysis. Given the direction of the 1995 guidance, the reader should read this section with the following considerations in mind:

- The Agency believes the amount of time necessary to perform a task is independent of the origins of its labor. In other words, if a source would employ X hours of burden to fully perform a function, then a contractor hired by the source would also take X hours to perform that same task. Furthermore, the Agency assumes no economies or diseconomies of scale in that the linear combination of any amount of contractor and source effort will also sum to X. Therefore, the burden estimates in this ICR act as an upper bound to the total burden to affected sources and PAs, given the affected entity does not employ contracted labor.
- For some burden categories, the Agency believes the hours assigned to them will be divided between the source and outside contractors. For these categories, the Agency established a composite cost per hour by developing a weighted average of the source and contractor wages, with the weight defined by the percentage of total effort each burden source applied. Consequently, if the Agency were to re-assess the cost of part 64 under the 1995 guidance methodology, the cost would be the same, with a portion of it shifted to capital and O&M costs, rather than included in the bottom line burden and cost estimates. The cost developed in this ICR should be interpreted as an upper bound on the actual cost of administration by the source or PA. The methodology for determining cost per hour can be found in greater detail in section 6(b), below.

6(a) ESTIMATING RESPONDENT BURDEN

This section presents estimates of the burden hours expected to be incurred at sources with emission units affected by Compliance Assurance Monitoring (CAM). Applying the same methodology used for this rulemaking's RIA, the Agency established estimates for five sample States and then extrapolated those data to the Nation. Results are contained in Tables 6-1 through 6-4. These tables summarize burden impacts for all pollutants by activity. The burden estimates reflect the expert judgement of EPA staff, contractors, and industry experts. All burden estimates represent the increment over part 70 requirements.

TABLE 6.1
WORKSHEET FOR SOURCE COSTS AND LABOR HOURS
64.5(a) "Large"; Five Sample States - All Pollutants

Task CAM Activities:	Annual - Per Respondent		Cost	Respondents			Annual Average	
	Labor Hours			Year	Cost ^{1 2}		Labor	
	Mgmt.	Tech.	(1995)		1	2		3
1 Review Requirements								
Facilities affected by parts 64 & 70	5	15	\$900	106	0	0	\$34	707
2 Determine Monitoring Approach								
Units without existing monitoring	0.75	2.25	\$135	43	7	29	\$4	78
Units with existing monitoring	0.25	0.75	\$45	49	7	34	\$1	30
3 Specify Monitoring Elements								
Units w/o existing monitoring: non CEM/COM response	4	12	\$720	38	6	26	\$17	369
Units w/o existing monitoring: CEM/COM response	2	6	\$360	5	1	3	\$1	25
Units with existing monitoring: non CEM/COM response	2	6	\$360	28	4	20	\$6	139
Units with existing monitoring: CEM/COM response	1	3	\$180	20	3	14	\$2	50
4 Design Documentation								
Units w/o existing monitoring: non CEM/COM response	0	4	\$160	38	6	26	\$4	92
Units w/o existing monitoring: CEM/COM response	0	2	\$80	5	1	3	\$0	6
Units with existing monitoring: non CEM/COM response	0	2	\$80	28	4	20	\$1	35
Units with existing monitoring: CEM/COM response	0	1	\$40	20	3	14	\$1	13
5 CAM Revisions								
Units w/o existing monitoring	0	4	\$160	0	1	3	\$0	5
Units with existing monitoring	0	2	\$80	0	1	3	\$0	3
6 CAM Renewal	2	6	\$360	0	0	62	\$7	165
7 Recordkeeping Activities								
Incremental recordkeeping burden (upgrade systems)	0	26	\$1,040	0	1	1	\$1	13
Daily record keeping for new work practices	0	390	\$15,600	0	2	2	\$22	584
Incremental recordkeeping burden (VE)	0	26	\$1,040	0	2	2	\$2	39
8 Incremental reporting	0	1	\$40	0	91	106	\$3	66
9 Facility certification	0.71	0	\$42	0	91	106	\$3	46
Burden Activities:							\$108	2,465
Capital and O&M Costs: ³							\$123	
Total Annualized Cost:							\$232	
Subtotal Planning, Revisions, Renewals & Certifications (Tasks #1 - #6, #9):							\$80	1,763
Subtotal Recordkeeping Activities (Task #7):							\$25	636
Subtotal Reporting Activities (Task #8):							\$3	66

- 1 In Thousands of dollars
- 2 Zero values indicate rounded annual costs of less than \$500.
- 3 This number is a gross aggregate of the annualized cost of new equipment, consistent but not separately identified in the RIA.

TABLE 6.2
WORKSHEET FOR SOURCE COSTS AND LABOR HOURS
64.5(a) “Large”; Five Sample States - All Pollutants

Task CAM Activities:	TOTAL HOURS ¹			TOTAL COST ^{2,3}		
	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1 Review Requirements						
Facilities affected by parts 64 & 70	2,120	0	0	\$95	\$0	\$0
2 Determine Monitoring Approach						
Units without existing monitoring	128	20	88	\$6	\$1	\$4
Units with existing monitoring	49	7	34	\$2	\$0	\$2
3 Specify Monitoring Elements						
Units w/o existing monitoring: non CEM/COM response	600	92	414	\$27	\$4	\$19
Units w/o existing monitoring: CEM/COM response	40	6	28	\$2	\$0	\$1
Units with existing monitoring: non CEM/COM response	227	35	157	\$10	\$2	\$7
Units with existing monitoring: CEM/COM response	82	13	56	\$4	\$1	\$3
4 Design Documentation						
Units w/o existing monitoring: non CEM/COM response	150	23	104	\$6	\$1	\$4
Units w/o existing monitoring: CEM/COM response	10	2	7	\$0	\$0	\$0
Units with existing monitoring: non CEM/COM response	57	9	39	\$2	\$0	\$2
Units with existing monitoring: CEM/COM response	20	3	14	\$1	\$0	\$1
5 CAM Revisions						
Units w/o existing monitoring	0	5	11	\$0	\$0	\$0
Units with existing monitoring	0	3	6	\$0	\$0	\$0
6 CAM Renewal	0	0	494	\$0	\$0	\$22
7 Recordkeeping Activities						
Incremental recordkeeping burden (upgrade systems)	0	19	22	\$0	\$1	\$1
Daily record keeping for new work practices	0	808	943	\$0	\$32	\$38
Incremental recordkeeping burden (VE)	0	54	63	\$0	\$2	\$3
8 Incremental reporting	0	91	106	\$0	\$4	\$4
9 Facility certification	0	64	75	\$0	\$4	\$5

- 1 Total hours per respondent multiplied by the number of respondents during a given year.
- 2 (In thousands of \$1995)
- 3 Zero values indicate rounded annual costs of less than \$500.

**TABLE 6.3
WORKSHEET FOR SOURCE COSTS AND LABOR HOURS
64.5(b) "Other"; Five Sample States - All Pollutants**

Task CAM Activities:	Annual - Per Respondent			Respondents			Annual Average	
	Labor Hours		Cost	Year			Cost ^{1 2}	Labor
	Mgmt.	Tech.	(\$1995)	1	2	3	(\$1995)	Hours
1 Review Requirements								
Facilities affected by parts 64 & 70	5	15	\$900	1,073	0	0	\$344	7,153
2 Determine Monitoring Approach								
Units without existing monitoring	0.75	2.25	\$135	0	0	254	\$11	254
Units with existing monitoring	0.25	0.75	\$45	0	0	214	\$3	71
3 Specify Monitoring Elements								
Units w/o existing monitoring: non CEM/COM response	4	12	\$720	0	0	247	\$55	1,316
Units w/o existing monitoring: CEM/COM response	2	6	\$360	0	0	7	\$1	20
Units with existing monitoring: non CEM/COM response	2	6	\$360	0	0	187	\$21	500
Units with existing monitoring: CEM/COM response	1	3	\$180	0	0	26	\$1	35
4 Design Documentation								
Units w/o existing monitoring: non CEM/COM response	0	4	\$160	0	0	247	\$12	329
Units w/o existing monitoring: CEM/COM response	0	2	\$80	0	0	7	\$0	5
Units with existing monitoring: non CEM/COM response	0	2	\$80	0	0	187	\$5	125
Units with existing monitoring: CEM/COM response	0	1	\$40	0	0	26	\$0	9
5 CAM Revisions								
Units w/o existing monitoring	0	4	\$160	0	0	0	\$0	0
Units with existing monitoring	0	2	\$80	0	0	0	\$0	0
6 CAM Renewal	2	6	\$360	0	0	468	\$52	1,248
7 Recordkeeping Activities								
Incremental recordkeeping burden (upgrade systems)	0	26	\$1,040	0	0	0	\$0	0
Daily record keeping for new instrumental systems	0	130	\$5,200	0	0	0	\$0	0
Incremental recordkeeping burden (VE)	0	26	\$1,040	0	0	0	\$0	0
8 Incremental reporting	0	1	\$40	0	0	0	\$0	0
9 Facility certification	0.71	0	\$42	0	0	0	\$0	0
Burden Activities:							\$506	11,065
Capital and O&M Costs: ³							\$0	
Total Annualized Cost:							\$506	
Subtotal Planning, Revisions, Renewals & Certifications (Tasks #1 - #6, #9):							\$506	
Subtotal Recordkeeping Activities (Task #7):							\$0	0
Subtotal Reporting Activities (Task #8):							\$0	0

- 1 In Thousands of dollars
- 2 Zero values indicate rounded annual costs of less than \$500.
- 3 This number is a gross aggregate of the annualized cost of new equipment, consistent but not separately identified in the RIA.

TABLE 6.4
WORKSHEET FOR SOURCE COSTS AND LABOR HOURS
64.5(b) “Other”; Five Sample States - All Pollutants

Task CAM Activities:	TOTAL HOURS ¹			TOTAL COST ^{2, 3}		
	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1 Review Requirements Facilities affected by parts 64 & 70	21,460	0	0	\$966	\$0	\$0
2 Determine Monitoring Approach Units without existing monitoring	0	0	763	\$0	\$0	\$34
Units with existing monitoring	0	0	214	\$0	\$0	\$10
3 Specify Monitoring Elements Units w/o existing monitoring: non CEM/COM response	0	0	3,949	\$0	\$0	\$178
Units w/o existing monitoring: CEM/COM response	0	0	59	\$0	\$0	\$3
Units with existing monitoring: non CEM/COM response	0	0	1,499	\$0	\$0	\$67
Units with existing monitoring: CEM/COM response	0	0	106	\$0	\$0	\$5
4 Design Documentation Units w/o existing monitoring: non CEM/COM response	0	0	987	\$0	\$0	\$39
Units w/o existing monitoring: CEM/COM response	0	0	15	\$0	\$0	\$1
Units with existing monitoring: non CEM/COM response	0	0	375	\$0	\$0	\$15
Units with existing monitoring: CEM/COM response	0	0	26	\$0	\$0	\$1
5 CAM Revisions Units w/o existing monitoring	0	0	0	\$0	\$0	\$0
Units with existing monitoring	0	0	0	\$0	\$0	\$0
6 CAM Renewal	0	0	3,744	\$0	\$0	\$168
7 Recordkeeping Activities Incremental recordkeeping burden (upgrade systems)	0	0	0	\$0	\$0	\$0
Daily record keeping for new instrumental systems	0	0	0	\$0	\$0	\$0
Incremental recordkeeping burden (VE)	0	0	0	\$0	\$0	\$0
8 Incremental reporting	0	0	0	\$0	\$0	\$0
9 Facility certification	0	0	0	\$0	\$0	\$0

1 Total hours per respondent multiplied by the number of respondents during a given year.

2 (In thousands of \$1995)

3 Zero values indicate rounded annual costs of less than \$500.

The Agency assigned emission units to one of two categories. The first category, “Large” units, applies to units that have the potential to emit the applicable regulated air pollutant in an amount equal to

or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. The remaining emission units are categorized as “Other.”

Due to the differences in monitoring frequency requirements and implementation schedules for the “Large” and “Other” emission units, the Agency calculated the associated burdens separately. Tables 6-1 and 6-2 report labor burdens for “Large” units, and Tables 6-3 and 6-4 report burden for “Other” units. For each type of unit, the first table summarizes the average annual burdens for each activity. Average annual labor burden is computed as the arithmetic average of annual labor burden across the first three years of the information collection. Annual burden is computed as the product of the annual labor hours per respondent for a specific activity and the number of respondents. The average annual labor burden over the first three years for the large and other emissions units in the five sample States is estimated to be 2,465 hours and 11,065 hours, respectively.

Tables 6-2 and 6-4 report the yearly burden by activity for the five sample States. These tables more clearly identify variations in burden over time by activity. The timing of activities is determined from the implementation schedule presented in the RIA. Because the large units are subject to a faster implementation schedule than the other units, the burden estimates for the early years of implementation are higher for the large units. Estimates for the first three years are shown so as to coincide with the term length of the Information Collection. An artifact of the three-year analysis is that the CAM Rule burden and costs reported in this ICR do not fully reflect the scope of the part 64 requirements. Due to timing considerations, some sources can avoid initial reporting for almost ten years, as shown in Tables IV-22 and IV-23.

6(b) ESTIMATING RESPONDENT COSTS

Tables 6-1 and 6-2 show the costs associated with “Large” emission units and Tables 6-3 and 6-4 show the costs associated with the “Other” emission units. Each pair of tables shows average annual impacts and year-by-year impacts, respectively. Burden costs in Tables 6-1 and 6-2 are classified into one of three categories: costs associated with CAM design activities, recordkeeping activities, or reporting activities. Also, for capital and O&M costs, the tables only report aggregate totals. The nature of the data prohibits any further disaggregation. All cost estimates represent the increment over part 70 requirements.

The RIA methodology relies on a bottom-up methodology to develop most activity costs. Thus, the methodology starts with hour estimates for activities and assumed labor rates to derive consistent cost estimates. This study identifies two labor categories: a management level category with a wage rate of \$60.00/hour (1995 dollars) and a technical staff category with a rate of \$40.00/hour (1995 dollars). For some tasks, a wage rate of \$45.00/hour is assumed. The \$45/hour rate is a weighted average of the two labor category rates, representing a mixture of labor categories and is generally consistent with the wage rate assumptions used in other recent EPA rulemakings. These rate assumptions are also consistent with the CAM RIA.

For each response activity, Tables 6-1 and 6-3 display the Annual Labor Hours per Respondent (by labor category) assumed necessary to complete the activities. In this ICR, a

respondent is generally a pollutant specific emissions unit. For each activity, the Annual Cost per Respondent is computed by applying the appropriate wage rate to the number of labor hours in that category. Total Respondents for each of the three years of the ICR is derived by applying the schedule of implementation to the total number of respondents (for the five sample States), as found in the RIA. Applying the Annual Cost per Respondent to the number of respondents in each of the three years in the ICR, discounting the annual totals at a real rate of 7 percent per OMB guidance, and annualizing their sum yields the Annualized Cost for each burden activity. From Tables 6-1 and 6-3, the total annualized cost (\$1995) for burden activities for the five sample States is \$232 thousand for “Large” units and \$506 thousand for the “Other” units.

Burden activity subtotals are reported for Recordkeeping Activities and Reporting Activities in Tables 6-1 and 6-3. Annualized recordkeeping costs are \$25 thousand and \$0 for the “Large” and “Other” units respectively. Annualized reporting costs are calculated to be \$3 thousand and \$0 for the “Large” and “Other” emission units respectively. The recordkeeping and reporting costs for the other sources are estimated to be zero over the first three years because of the longer implementation timetable for these sources.

The Agency calculates capital and O&M costs separately for items associated with the collection request. All capital equipment costs for durable monitoring equipment are annualized over the expected life of the equipment and discounted at a seven percent real rate, which is consistent with the RIA. Tables 6-1 and 6-3 show the Capital and O&M costs associated with the “Large” and “Other” units respectively for the five sample States. Table 6-1 lists the capital and O&M costs associated with the “Large” as \$123 thousand per year. This brings the total annualized ICR costs for the five sample States for the “Large” units to \$233 thousand per year. Table 6-3 lists “Other” emissions units as having no incremental capital or O&M costs over the first three years. Therefore, total annualized ICR costs for the five sample States for the other units are \$506 thousand.

Tables 6-2 and 6-4 display the year-by-year costs for completion of each activity. Total Hours is computed across labor categories by multiplying the annual labor hours by the corresponding annual number of respondents (found in Tables 6-1 and 6-3). Total Cost is computed analogous to Total Hours from the multiplication of Annual Cost with the corresponding annual number of respondents for the “Large” and “Other” units, respectively. The information provided in Tables 6-2 and 6-4 illustrates the variation in burden and costs in the first three years of the information collection. As discussed in the RIA, only a portion of all CAM affected emissions units will begin monitoring activities within the three year period covered by this information collection.

6(c) ESTIMATING AGENCY BURDEN AND COST

Tables 6-5 through 6-8 show the burden and costs for State and Local Agencies associated with the five sample States. Tables 6-5 and 6-6 display the annual and yearly summaries of the burden and costs for actions related to large pollutant specific emissions units, while Tables 6-7 and 6-8 display this summary information for actions related to the other pollutant specific emissions units. Seven activities are shown in the tables which the Agency believes fully defines the State and Local Agencies’

burden under part 64. The methodology used to derive the State and Local burden hours and costs parallels the procedures described in the RIA. The approach is a “bottom-up” approach with the estimates of the labor hours needed to perform each activity combined with an estimate of the number of respondents. The labor hour estimates for each activity are based on the expert knowledge of EPA staff. Column 2 of Tables 6-5 and 6-7 reflects the estimates of the annual labor hours required for each respondent to complete the six activities under consideration. For the first activity, applicability is defined on an Agency basis. Applicability for the other activities is expected to be related to the number of pollutant points. The labor estimates for these activities reflect the PA hours required to complete the activities for one pollutant specific emissions unit. Depending on the activity, the labor hours required may be broken out by the type of existing monitoring and the type of response.

Column 3 of Tables 6-5 and 6-7 shows the annual cost per respondent. This estimate is obtained by multiplying the annual labor hours in column 2 by a PA hourly labor rate of \$40.00 (1995 dollars). Columns 4, 5, and 6 of Tables 6-5 and 6-7 report the numbers of respondents for each of the three years under consideration. Task 1, which is an Agency specific activity, will occur only in the first year of the analysis. The respondent estimates for the remaining tasks are for pollutant specific emissions units and are dependent on the timing of the units’ completion of the permit application. Column 7 reports the average annual labor hours. The annualized costs for each activity are shown in column 8. The costs are reported in 1995 dollars and reflect a time horizon of three years and a real discount rate of 7 percent. Total annualized costs for the PAs are estimated to be \$12,619 and \$38,893, respectively, for the large and other sources.

Tables 6-6 and 6-8 report the yearly summaries of the labor hours and costs associated with each of the tasks for the three year period under consideration. Labor hours for each year are obtained by multiplying the annual labor hours per respondent by the number of respondents in each year. Total costs in each year are calculated by multiplying the total hours in each year by the labor rate of \$40.00.

The operating permits program requires State permit program costs to be paid for through permitting fees. Therefore, most, if not all of the State and Local agency cost for CAM can be shifted to the respondents.

Burden estimates for Federal activities focus on the provision of guidance and oversight to State and local agencies and to review requests for alternative monitoring practices. EPA estimates that 2 percent of affected pollutant points will request alternative monitoring annually. This estimate is based on historical data for related actions under other regulations. Each request can be processed with two hours of labor at a rate of \$34/hour. Because of the small number of sources initiating monitoring within the three year period covered by this ICR, the impact of these actions is expected to be negligible.

Table 6.5
PERMITTING AUTHORITY ANNUAL LABOR HOURS AND COSTS
64.5(a) "Large"; Five Sample States - All Pollutants

Task CAM Activities	Per Respondent		Respondents			Total Annual	
	Labor ³	Cost	Year 1	Year 2	Year 3	Labor ³	Costs ^{2,4}
1 Rule Familiarization	54	\$2,158	5	0	0	90	\$4
2 Applicability Determination	0.67	\$27	0	91	15	24	\$1
3 Initial CAM Review							
Units w/o existing monitoring: non CEM/COM response	2	\$80	0	38	6	29	\$1
Units w/o existing monitoring: CEM/COM response	1	\$40	0	5	1	2	\$0
Units with existing monitoring: non CEM/COM response	1	\$40	0	28	5	11	\$0
Units with existing monitoring: CEM/COM response	0.5	\$20	0	20	3	4	\$0
4 CAM Revisions							\$0
Units w/o existing monitoring	1	\$40	0	1	3	1	\$0
Units with existing monitoring	0.5	\$20	0	1	3	1	\$0
5 Review Reports	2	\$80	0	91	107	132	\$5
6 CAM Renewals	1	\$40	0	0	0	0	\$0
7 Certifications	0.33	\$13	0	91	107	22	\$1
Total Cost and Burden:						316	\$13

1 In real \$1995.

2 In thousands of real \$1995.

3 In hours.

4 Total hours per respondent multiplied by the number of respondents during a given year.

Table 6.6
PERMITTING AUTHORITY LABOR HOURS AND COSTS
64.5(a) "Large"; Five Sample States - All Pollutants

Task CAM Activities	Total Hours Per Year ¹			Total Costs Per Year ^{2,3}		
	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1 Rule Familiarization	270	0	0	\$11	\$0	\$0
2 Applicability Determination	0	61	10	\$0	\$2	\$0
3 Initial CAM Review						
Units w/o existing monitoring: non CEM/COM response	0	75	13	\$0	\$3	\$1
Units w/o existing monitoring: CEM/COM response	0	5	1	\$0	\$0	\$0
Units with existing monitoring: non CEM/COM response	0	28	5	\$0	\$1	\$0
Units with existing monitoring: CEM/COM response	0	10	2	\$0	\$0	\$0
4 CAM Revisions						
Units w/o existing monitoring	0	1	3	\$0	\$0	\$0
Units with existing monitoring	0	1	2	\$0	\$0	\$0
5 Review Reports	0	183	213	\$0	\$7	\$9
6 CAM Renewals	0	0	0	\$0	\$0	\$0
7 Certifications	0	30	36	\$0	\$1	\$1

- 1 Total hours per respondent multiplied by the number of respondents during a given year).
- 2 In thousands of 1995 dollars.
- 3 Total hours per respondent multiplied by the number of respondents during a given year.

TABLE 6.7
PERMITTING AUTHORITY LABOR HOURS AND COSTS
64.5(a) "Other"; Five Sample States - All Pollutants

Task CAM Activities	Per Respondent		Respondents			Total Annual	
	Labor ³	Cost	Year 1	Year 2	Year 3	Labor ³	Costs ^{2,4}
1 Rule Familiarization	546	\$21,842	5	0	0	910	\$39
2 Applicability Determination	0.67	\$27	0	0	0	0	\$0
3 Initial CAM Review							
Units w/o existing monitoring: non CEM/COM response	2	\$80	0	0	0	0	\$0
Units w/o existing monitoring: CEM/COM response	1	\$40	0	0	0	0	\$0
Units with existing monitoring: non CEM/COM response	1	\$40	0	0	0	0	\$0
Units with existing monitoring: CEM/COM response	0.5	\$20	0	0	0	0	\$0
4 CAM Revisions							\$0
Units w/o existing monitoring	1	\$40	0	0	0	0	\$0
Units with existing monitoring	0.5	\$20	0	0	0	0	\$0
5 Review Reports	2	\$80	0	0	0	0	\$0
6 CAM Renewals	1	\$40	0	0	0	0	\$0
7 Certifications	0.33	\$13	0	0	0	0	\$0
Total Cost and Burden:						910	\$39

- 1 In real \$1995.
- 2 In thousands of real \$1995.
- 3 In hours.
- 4 Total hours per respondent multiplied by the number of respondents during a given year.

TABLE 6.8
PERMITTING AUTHORITY LABOR HOURS AND COSTS
64.5(a) "Other"; Five Sample States - All Pollutants

Yearly Summary	Total Hours Per Year ¹			Total Costs Per Year ^{2,3}		
	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1 Rule Familiarization	2,730	0	0	\$109	\$0	\$0
2 Applicability Determination	0	0	0	\$0	\$0	\$0
3 Initial CAM Review						
Units w/o existing monitoring: non CEM/COM response	0	0	0	\$0	\$0	\$0
Units w/o existing monitoring: CEM/COM response	0	0	0	\$0	\$0	\$0
Units with existing monitoring: non CEM/COM response	0	0	0	\$0	\$0	\$0
Units with existing monitoring: CEM/COM response	0	0	0	\$0	\$0	\$0
4 CAM Revisions						
Units w/o existing monitoring	0	0	0	\$0	\$0	\$0
Units with existing monitoring	0	0	0	\$0	\$0	\$0
5 Review Reports	0	0	0	\$0	\$0	\$0
6 CAM Renewals	0	0	0	\$0	\$0	\$0
7 Certifications	0	0	0	\$0	\$0	\$0

- 1 Total hours per respondent multiplied by the number of respondents during a given year).
- 2 In thousands of 1995 dollars.
- 3 Total hours per respondent multiplied by the number of respondents during a given year.

6(d) SUMMARY BURDEN HOUR AND COST ESTIMATES

Tables 6-9 and 6-10 display the annual average burden hours and annualized costs incurred for the five sample States and Nation, respectively. Results are reported for the “Large” and “Other” sources and for PA activities related to these sources. Table 6-9 presents the summary burden and cost estimates for the five sample States. These data include the annualized costs for reporting and recordkeeping activities as well as the annualized costs for capital equipment and O&M. Table 6-10 displays annual average burden hours and costs incurred for the nation. The results of Table 6-10 are based on the five sample states results found in Table 6-9. The results from the five sample States are extrapolated by a factor of ten to arrive at the totals representative of the nation. This corresponds to the approach used in the RIA to develop national results.

**Table 6-9
SAMPLE STATE RESULTS**

Respondent	Annual Burden Hours	Annualized Cost ¹	Annualized Capital and O&M ¹
Large Units	2,465	\$108	\$123
Other Units	11,065	\$506	\$0
PAs (large units)	316	\$13	\$0
PAs (other units)	910	\$39	\$0
Federal Authorities ²	--	-	-
Total	14,756	\$666	\$123

- 1 In thousands of \$1995.
- 2 Burden hours and costs are expected to be negligible.

**Table 6-10
NATIONAL RESULTS**

Respondent	Annual Burden Hours	Annualized Cost ¹	Annualized Capital and O&M ¹
Large Units	24,650	\$1,080	\$1,230
Other Units	110,650	\$5,060	\$0
PAs (large units)	3,160	\$126	\$0
PAs (other units)	9,100	\$389	\$0

Federal Authority ²	--	-	-
Total	147,560	\$6,655	\$1,230

1 In thousands of \$1995.

2 Burden hours and costs are expected to be negligible.

6(e) REASONS FOR CHANGE IN BURDEN

This is an initial request for clearance for the information collection required for the part 64 Compliance Assurance Monitoring Rule. Therefore, the request contains no changes from a previously existing request.

6(f) BURDEN STATEMENT

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. The 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.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St. 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, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.