

**Information Collection Request Renewal
Supporting Statement for the
Implementation of the Fine Particulate Matter National
Ambient Air Quality Standards
EPA ICR Number 2258.05
OMB Control No. 2060-0611**

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**EPA Information Collection Request Renewal for the
PM_{2.5} National Ambient Air Quality Standards
State Implementation Plan Requirements Rule**

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1. Identification of the Information Collection Request

1(a) Title of the Information Collection

The title of the Information Collection Request is Implementation of the PM_{2.5} National Ambient Air Quality Standards (NAAQS) (Renewal), ICR number 2258.05, and OMB Control Number 2060-0611.

1(b) Abstract/Executive Summary

The EPA has established a suite of PM_{2.5} standards based on numerous health studies and other evidence demonstrating that serious health effects are associated with exposure to elevated levels of PM_{2.5}. Estimates show that attainment of the PM_{2.5} standards would result in tens of thousands fewer premature deaths each year, tens of thousands fewer hospital admissions each year, and hundreds of thousands fewer doctor visits, absences from work and school, and respiratory illnesses in children annually. EPA initially established annual and 24-hour PM_{2.5} standards in 1997. The 24-hour standard was subsequently revised in 2006, and the primary annual standard was revised in 2012.

The EPA finalized the PM_{2.5} NAAQS State Implementation Plan (SIP) Requirements Rule (81 FR 58010) effective October 24, 2016, to describe the Clean Air Act (CAA) requirements that must be met by states with nonattainment areas to develop plans for attaining and maintaining the NAAQS. The intended effect of the PM_{2.5} NAAQS SIP Requirements Rule is to provide certainty to states regarding their planning obligations related to SIP development. Only states with nonattainment areas are required to submit SIPs that meet the requirements of the rule.

On December 18, 2014, the EPA designated fourteen areas as nonattainment for the 2012 PM_{2.5} NAAQS (78 FR 3086). The EPA conducted an analysis for ICR Number 2258.04 using the initial fourteen nonattainment areas. The estimate also included the estimated burden associated with ongoing implementation obligations for the remaining areas designated nonattainment for the 1997 and/or 2006 PM_{2.5} NAAQS. The EPA requested comment on this analysis in the proposed PM_{2.5} NAAQS SIP Requirements Rule (80 FR 18177) and received no comments. After proposing the PM_{2.5} NAAQS SIP Requirements Rule, the EPA revised initial area designations for several 2012 PM_{2.5} NAAQS areas on March 31, 2015 (80 FR 18535). This designation action revised the count from 14 to nine nonattainment areas, while several counties in three states remained deferred. In light of the lack of comments on the initial estimate, and to ensure that the final estimate was not an underestimate in light of uncertainty, the EPA did not revise its estimate for ICR Number 2258.04.

The information collection activities in this proposed renewal have been submitted for approval to the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA). The PRA requires the EPA to assess the administrative burden (in hours and dollars) for state air agencies to develop plans to attain the PM_{2.5} NAAQS, and for EPA to review and take

action on such plans. This proposed ICR renewal covers the period February 1, 2020-January 31, 2023.

The EPA estimates the administrative burden for states with nonattainment areas for the 1997, 2006 and 2012 PM_{2.5} NAAQS to be 76,500 hours. The present value of the total costs for state governments (the respondents) is estimated at \$4.8 million for the 3-year period, or \$1.6 million per year during the 3-year period of the ICR.

The estimated administrative burden for EPA is estimated to be 8,415 hours. The present value of the Agency administrative cost burden is estimated at \$0.53 million dollars for the 3-year period, or \$0.17 million per year during the 3-year period.

2. Need For and Use of the Collection

2(a) Need/Authority for the Collection

The CAA, which was last amended in 1990, requires the EPA to establish National Ambient Air Quality Standards (NAAQS) for air pollutants that may reasonably be anticipated to endanger public health or welfare, and which result from numerous or diverse sources. On July 18, 1997, the EPA revised the NAAQS for particulate matter to add new standards for fine particulate matter (particles of solid and liquid material less than 2.5 microns in aerodynamic diameter, or PM_{2.5}). The EPA established health-based (primary) annual and 24-hour standards for PM_{2.5} (62 FR 38652). The annual standard was set at a level of 15 micrograms per cubic meter, based on the 3-year average of annual mean PM_{2.5} concentrations. The 24-hour standard was set at a level of 65 micrograms per cubic meter, based on the 3-year average of the 98th percentile of 24-hour concentrations. The welfare-based secondary standards were established identical to the primary standards.

Part D of Title I of the Clean Air Act sets forth the implementation plan requirements for areas designated nonattainment for a NAAQS. The PM_{2.5} Implementation Rule for the 1997 PM_{2.5} NAAQS was proposed November 1, 2005 (70 FR 65983) and was promulgated on April 25, 2007 (72 FR 20586). The preamble to the proposed and final regulation addressed the administrative burden associated with attainment planning for the 1997 NAAQS in general terms. The preamble to the final rule stated that an ICR would be prepared.

On October 17, 2006, the EPA revised the NAAQS for fine particles. The EPA established new primary 24-hour standards for PM_{2.5} (71 FR 61144). The 24-hour standards (primary and secondary) were set at a level of 35 micrograms per cubic meter, based on the 3-year average of the 98th percentile of 24-hour concentrations. The primary and secondary annual standards remained unchanged at a level of 15 micrograms per cubic meter, based on the 3-year average of annual mean PM_{2.5} concentrations. The initial ICR 2258.01 covered the time period between April 5, 2008 through April 4, 2011. An extension without change of ICR 2258.02 was subsequently issued through April 30, 2012.

On December 14, 2012, the EPA once again revised the NAAQS for fine particles. The EPA established a new primary annual standard for PM_{2.5} (78 FR 3086). The annual standard was set at a level of 12 micrograms per cubic meter, based on the 3-year average of annual mean PM_{2.5}

concentrations. The 24-hour standard remained unchanged at a level of 35 micrograms per cubic meter, based on the 3-year average of the 98th percentile of 24-hour concentrations. The time period covered in the ICR 2258.03 was a 3-year period from May 1, 2012 through April 30, 2015. ICR 2258.03 was issued a 60-day extension from April 30, 2015 through June 30, 2015. The ICR 2258.03 lapsed on July 1, 2015.

Following a January 2013 decision by the U.S. Circuit Court of Appeals for the D.C. Circuit that remanded the 2007 PM_{2.5} Implementation Rule, on March 23, 2015, the EPA proposed the PM_{2.5} NAAQS SIP Requirements Rule and finalized the rule on August 24, 2016. This rule provided the framework for states to follow in developing SIPs to attain the 1997 PM_{2.5} NAAQS, the 2006 PM_{2.5} NAAQS and the 2012 PM_{2.5} NAAQS.

The framework in the rule reflects the applicable requirements described in the CAA part D nonattainment area provisions found in sections 172 (subpart 1) and sections 188-190 (subpart 4). A PM_{2.5} attainment plan must include rules requiring emission reductions and a demonstration showing whether the particular area can attain the standard by its attainment date. A state plan submittal for attaining the PM_{2.5} NAAQS is due to EPA within 18 months after the date the area is designated as nonattainment. After a state submits a plan, the CAA requires the EPA to review the plan, and approve or disapprove it. Once an area is no longer violating the NAAQS, it may request a redesignation from “nonattainment” to “attainment.” This requires the state to develop a maintenance plan to demonstrate that the area will continue to maintain the NAAQS during a 10-year maintenance period.

ICR 2258.04 was included with the final 2016 PM_{2.5} NAAQS SIP Requirements Rule. This proposed ICR 2258.05 covers February 1, 2020-January 31, 2023.

2(b) User/Users of the Data

The data collected from the state and local air agency respondents will include the nonattainment SIP elements and maintenance plan requirements under the CAA that are described in more detail in the PM_{2.5} NAAQS SIP Requirements Rule. Attainment plans for the PM_{2.5} NAAQS nonattainment areas must contain state rules and other requirements designed to achieve the NAAQS by the deadlines established under the CAA. Maintenance plans, should a state choose to pursue redesignation for a nonattainment area once its air quality shows attainment, must contain requirements designed to maintain the NAAQS for a 10-year maintenance period.

The PM_{2.5} attainment plan submitted by the state must meet the various requirements in subpart 1 and subpart 4 and guidance, including the following:

- Baseline emission inventory and projection year inventory for stationary, mobile, and area emissions sources in the nonattainment area consistent with 40 CFR 51.1008.
- For Moderate areas, an analysis of economic and technological feasibility of potential control measures (i.e., reasonably available control measures (RACM) and reasonably available control technology (RACT)) and the adoption of state rules requiring emission

reductions to ensure attainment of the standard “as expeditiously as practicable,” consistent with 40 CFR 51.1007 and 51.1009.

- For Serious areas, an analysis of economic and technological feasibility of potential control measures (i.e., best available control measures (BACM) and best available control technology (BACT)) and the adoption of state rules requiring emission reductions to ensure attainment of the standard “as expeditiously as practicable,” consistent with 40 CFR 51.1010.
- For those Serious areas that fail to meet the Serious area attainment date, the state must submit a SIP revision consistent with CAA section 189(d) which provides an annual reduction in PM_{2.5} or its precursor emissions of not less than 5 percent, within 12 months after the applicable attainment date.
- An attainment date consistent with 40 CFR 51.1004.
- An attainment demonstration with air quality modeling showing that existing federal and state emission reduction programs, plus any new emission reduction programs adopted by the state, will result in expeditious attainment by the attainment date, consistent with 40 CFR 51.1011. The attainment demonstration must meet the requirements of 40 CFR 51.112 and Part 51, Appendix W, and must include emission inventory data, modeling results, and emission reduction analyses on which the state has based its projected attainment date.
- An optional precursor demonstration to demonstrate out of the requirements under subpart 4 to regulate PM_{2.5} precursors for attainment and nonattainment new source review purposes.
- A plan showing that future emission reductions will provide for reasonable further progress (RFP) toward attainment of the standard for the period prior to the area’s attainment date, consistent with 40 CFR 51.1012; and reporting every 3 years on quantitative milestones showing progress in the implementation of the attainment plan and associated control measures, consistent with 40 CFR 51.1013.
- Contingency measures to promptly correct NAAQS violations.

If a state chooses to seek redesignation for a nonattainment area that is no longer violating the NAAQS, the PM_{2.5} maintenance plan submitted by the state must include the various requirements in subpart 1 and subpart 4, and guidance including:

- Baseline emission inventory and projection year inventory for stationary, mobile, and area emissions sources in the nonattainment area consistent with 40 CFR 51.1008.
- A demonstration that the area will continue to attain for the 10-year period following the redesignation, including air quality modeling.
- Verification of continued attainment, including tracking progress through updating the inventory, re-evaluate modeling assumptions or inputs or other methods as needed.
- Contingency measures to promptly correct NAAQS violations that occur after the redesignation.

The states use this information and analysis to fulfill federal obligations under Title I, part D of the Clean Air Act and the PM_{2.5} NAAQS SIP Requirements Rule.

The EPA regional and headquarters offices will use the submitted information in determining the adequacy of the various elements of the PM_{2.5} attainment or maintenance plan. The EPA is

required under the CAA to approve or disapprove a SIP revision within 12 months of the submission being found complete. Emission reduction regulations developed by the states become federally enforceable when approved by the EPA.

3. Non-Duplication, Consultations, and Other Collection Criteria

3(a) Non-Duplication

As noted in section 2(b) above, the state respondent will need to include a number of separate and unique elements for each plan submittal. For example, each Serious area attainment plan must include a unique BACM/BACT analysis, attainment demonstration, RFP plan and quantitative milestone reports.

However, there are other activities covered by existing ICRs which complement the elements required in the PM_{2.5} plans. For example, the existing PM_{2.5} monitoring network, covered under a separate ICR, provides essential data for use by states and EPA in identifying key categories of emissions and tracking progress toward attainment.

EPA encourages the states to account for control measures and expected emission reductions from existing regulations and implementation planning processes, such as for the the PM_{2.5} NAAQS, the ozone NAAQS, or the regional haze program. Taking such steps, where appropriate, may enable states to reduce the incremental administrative burden associated with this rule and enable identification of control strategies that achieve multi-pollutant environmental progress at a lower cost.

Relevant ICRs and their titles are identified below.

- Requirements for Preparation, Adoption, and Submittal of Implementation Plans
 - o 51.121-51.122 NO_x SIP Call.....2060-0445
 - o 51.160-51.166 New Source Review.....2060-0003
 - o 51.321-51.323 Air Quality Data Reporting.....2060-0088
 - o 51.353-51.354 Inspection/Maintenance.....2060-0252
 - o 51.365-51.366 Inspection/Maintenance.....2060-0252
- Approval and Promulgation of Implementation Plans
 - o 52.21 Prevention of Significant Deterioration.....2060-0003
- Ambient Air Monitoring Reference and Equivalent Methods
 - o 53.42080-0005
 - o 53.9(f),(h),(i).....2080-0005
 - o 53.14.....2080-0005
 - o 53.152080-0005
 - o 53.16(a)-(d),(f).....2080-0005
- Outer Continental Shelf Air Regulations
 - o 55.4-55.82060-0249
 - o 55.11-55.142060-0249
- Ambient Air Quality Surveillance

- o 58.11-58.142060-0084
- o 58.20-58.232060-0084
- o 58.25-58.282060-0084
- o 58.30-58.312060-0084
- o 58.332060-0084
- o 58.352060-0084
- o 58.40-58.412060-0084
- o 58.432060-0084
- o 58.452060-0084
- o 58.502060-0084
- Determining Conformity of Federal Actions to State or Federal Implementation Plans
 - o 91.150-93.1602060-0279
- 8-hour Ozone National Ambient Air Quality Standard Implementation Rule
 - o 2236.02.....2060 – 0594

3(b) Public Notice Required Prior to ICR Submission to the Office of Management and Budget (OMB)

This is a renewal of the existing ICR for the PM_{2.5} SIP Requirements Rule, which is currently approved through January 31, 2020. For the most recent renewal request, public comments were solicited via the *Federal Register* on October 1, 2019, during a 60-day comment period. No comments were received.

3(c) Consultations

In addition to soliciting comments on the proposed PM_{2.5} NAAQS SIP Requirements Rule on March 23, 2015 (80 FR 15339) and the ICR Renewal on October 1, 2019 (84 FR 52104), the EPA regularly consults with state and local air agencies through standing EPA-to-state meetings and monthly EPA, state and local air agency calls. NAAQS implementation updates are a routine agenda item on these calls. Call participants, which typically include well over 20 air agencies, are offered the opportunity to raise questions or offer comments on any agenda or non-agenda items. During the course of calls held during the ICR renewal process, no comments or questions were raised by air agencies regarding the ICR renewal. Furthermore, no comments related to the information collection activities were received on the proposed rulemaking or renewal.

3(d) Effects of Less Frequent Collection

The collections under this rule (as reviewed in section 2(b)) are necessary to comply with Clean Air Act requirements and provide assurances that identified levels of emission reductions are adequate to ensure timely attainment and maintenance of the PM_{2.5} NAAQS.

3(c) General Guidelines

The reporting and recordkeeping requirements for the PM_{2.5} NAAQS SIP Requirements Rule do not violate any of the regulations promulgated by OMB under 5 CFR part 1320,

section 1320.5. This submission meets the current Paperwork Reduction Act guidelines set forth by OMB. Those guidelines reflect the requirements of 5 CFR 1320.6. The PM_{2.5} SIP Requirements Rule does not require:

- reporting more than once a year;
- respondents to participate in a statistical survey;
- responses to Agency inquiries in less than 30 days;
- respondents to receive remuneration for preparation of reports;
- records to be kept more than 3 years;¹
- manual methods of reporting.

3(f) Confidentiality

The information requested from the states to fulfill CAA requirements as described in section 2(b) will rely on emissions levels and control efficiency data provided by certain facilities in the private and public sectors. This information is available from a variety of sources and states should already have information from emission sources, as facilities should have provided this information to meet other NAAQS SIP requirements, operating permits, and/or emissions reporting requirements. It is the assimilation and analysis of that data (e.g., for BACM/BACT control measure determinations, the attainment demonstration, etc.) that is required by the PM_{2.5} NAAQS SIP Requirements Rule.

3(g) Sensitive Information

The anticipated submissions are not expected to include sensitive information.

4.0 The Respondents and the Information Requested

4(a) Respondents and Nonattainment areas

State and local air agencies² are the primary respondents under this ICR. Table 1 lists all 18 area or parts of areas that are currently nonattainment for one or more of the PM_{2.5} NAAQS and the potential submissions that one might reasonably expect from their respective states during the 3-year period covered by this ICR.

Table 1 also includes estimated burden hours for each nonattainment area and an estimated total weighted direct and indirect hourly equivalent salary cost of \$67.96 per hour. For those areas that are expected not to attain by their applicable PM_{2.5} NAAQS attainment date, we estimate 18,000 hours to develop and submit SIP revisions in the form of a new attainment plan. For those areas that will have attained by their applicable attainment dates, we estimate 300 hours for states to develop and submit maintenance plans and requests to redesignate those nonattainment areas back to attainment.

¹ However, the states may choose to retain the information for more than 3 years.

² Local, state, and federal agencies are part of the North American Industrial Classification System code number 924110, which includes “administration of air and water resources, and solid waste management programs.” See <http://www.census.gov/naics>.

Table 1. Areas Designated Nonattainment for 1997, 2006 and/or 2012 PM_{2.5} NAAQS: Estimated Burden for Meeting PM_{2.5} NAAQS Attainment Plan or Maintenance Plan Requirements During the Period February 1, 2020-January 31, 2023

Nonattainment Area for PM_{2.5} NAAQS	State	EPA Region	Potential Actions during ICR period 1/2020 to 2/2023	3-year Burden Estimate (Hours)	3-year Burden Estimate (Dollars)
Fairbanks	AK	10	2006 SIP Revision	18,000	\$1,223,280
Nogales	AZ	9	2006 Maintenance Plan	300	\$20,388
West Central Pinal	AZ	9	2006 Maintenance Plan	300	\$20,388
Imperial	CA	9	2006 Maintenance Plan	300	\$20,388
Los Angeles-South Coast Air Basin	CA	9	2006/2012 SIP Revisions; 1997 Maintenance Plan	18,300	\$1,243,668
Plumas County	CA	9	2012 SIP Revision	18,000	\$1,223,280
Sacramento	CA	9	2006 Maintenance Plan	300	\$20,388
San Francisco	CA	9	2006 Maintenance Plan	300	\$20,388
San Joaquin Valley	CA	9	1997/2006/2012 SIP Revisions	18,000	\$1,223,280
Logan	ID	10	2006 Maintenance Plan	300	\$20,388
West Silver Valley	ID	10	2012 Maintenance Plan	300	\$20,388
Libby	MT	8	1997 Maintenance Plan	300	\$20,388
Klamath Falls	OR	10	2006 Maintenance Plan	300	\$20,388
Oakridge	OR	10	2006 Maintenance Plan	300	\$20,388
Allegheny	PA	3	1997/2006/2012 Maintenance Plan	300	\$20,388
Logan	UT	8	2006 Maintenance Plan	300	\$20,388
Provo	UT	8	2006 Maintenance Plan	300	\$20,388
Salt Lake City	UT	8	2006	300	\$20,388

Nonattainment Area for PM _{2.5} NAAQS	State	EPA Region	Potential Actions during ICR period 1/2020 to 2/2023	3-year Burden Estimate (Hours)	3-year Burden Estimate (Dollars)
			Maintenance Plan		
TOTAL				76,500	\$5,198,940

4(b) Information Requested

The information requested, as described in section 2(b) of this ICR, is required to meet the requirements of the CAA. The implementation framework set forth in the PM_{2.5} SIP Requirements Rule does not adopt a “one-size-fits all” approach to meeting these requirements. This additional flexibility enables the states to customize, to the extent allowed by the Clean Air Act, their approach to attaining and maintaining the PM_{2.5} NAAQS.

Data Items. The emissions and control efficiency data required for the attainment demonstration, RFP, BACT, BACM, and quantitative milestone reporting are assumed to have been collected as a result of reporting activities required by other OMB approved ICRs. For example, the collection of emissions information for many stationary sources is required under other programs, such as the Air Emissions Reporting Rule (AERR) (see <https://www.epa.gov/air-emissions-inventories/air-emissions-reporting-requirements-aerr>). In developing PM_{2.5} SIPs, air agencies are expected to use a range of other readily available data sources, such as Regulatory Impact Analyses developed for illustrative purposes to support federal rules that are expected to reduce future emissions of particulate matter precursors, and data sources that provide economic and population growth rates.

Respondents’ Activities. The states will compile and reference air quality and emissions data, establish their analytical methodology, analyze and assess control technology, conduct emissions reduction and air quality modeling analyses, develop initial plan drafts, hold public hearings, adopt rules, regulations, and programs, have discussions with EPA staff as appropriate, refine the draft demonstrations and other plan elements as appropriate, adopt their plans, and formally submit them to the EPA.

Agency Activities. The EPA staff in the Regional offices will facilitate receipt of the draft and final submissions by reviewing materials and answering questions from the states regarding regulatory requirements, potential data sources, analytical tools, draft demonstrations, and other draft SIP or maintenance plan elements. The EPA Regional offices will evaluate the formal plan submissions and take rulemaking actions to approve or disapprove the plan revisions. The EPA headquarters staff will facilitate policy coordination and national consistency in the timely review and evaluation of plans from states around the country. They will also facilitate information flow among the regions and states to promote the development of nationally consistent attainment plan and/or maintenance plan submissions.

Reporting Protocols. The dates for plan submissions and milestone reports are as set forth in subpart 4 of Part D of the CAA (sections 188-190), in the PM_{2.5} NAAQS SIP Requirements Rule, and in other regional and national rulemakings that may reclassify areas or find that areas failed to attain a PM_{2.5} NAAQS by the applicable attainment date.

5.0 The Information Collected—Agency Activities, Collection Methodology, and Information Management

5(a) States, EPA Regional Offices, and EPA Headquarters Offices

States. The state agencies' activities include:

- Develop baseline emissions inventory and projected year inventory.
- Conduct analyses of economic and technological feasibility of potential control measures and adopt state rules requiring emission reductions to ensure attainment of the standard “as expeditiously as practicable” or maintenance of the NAAQS during the applicable 10-year maintenance period.
- Develop and evaluate emissions reduction strategies, and conduct air quality modeling showing that existing federal and state emissions reduction programs, plus any new emissions reduction programs adopted by the state, will result in expeditious attainment by the attainment date or maintenance of the NAAQS.
- Develop plans to ensure that future emissions reductions will provide for reasonable further progress toward attainment of the standard for the period prior to the area's attainment date.
- Submit quantitative milestone report within 90 days of a quantitative milestone date that demonstrates the area met its implementation milestones.

EPA Regional Offices. The Regional office activities include:

- Respond to inquiries from air agencies and provide guidance on plan development.
- Review technical data, analyses, and draft plan elements developed by air agencies.
- Evaluate formal plan submissions and conduct rulemaking actions approving or disapproving the submissions.

EPA Headquarters. The EPA headquarters office activities include:

- Answer questions regarding application and interpretation of rule provisions.
- Facilitate policy coordination and national consistency in the timely review and evaluation of plans from states around the country.
- Coordinate information flow between the regions and states to promote the development of approvable plan submissions.

5(b) Collection Methodology and Management

The PM_{2.5} attainment and optional maintenance plans submitted by air agencies will set forth the data sources, analytical methods, and emission reduction and air quality improvement verification procedures used in their development and implementation.

5(c) Small Entity Flexibility

The PM_{2.5} NAAQS SIP Requirement Rule does not provide a direct administrative burden on small entities.

5(d) Collection Schedule

The deadlines for implementing the PM_{2.5} NAAQS under subpart 4 are set consistent with CAA requirements. BACM/BACT requirements for Serious area SIPs are due within 18 months of the date an area is reclassified as Serious. For an area reclassified to Serious by operation of law under CAA section 188(b)(2), a state must submit a new attainment demonstration no later than 18 months after reclassification. For an area reclassified to Serious pursuant to the agency's discretionary authority provided under CAA section 188(b)(1)(B), a state must submit a new attainment demonstration within 18 months after the required date for the State's submission of a SIP for the Moderate area. CAA section 189(d) plan revisions are due within 12 months after the missed Serious area attainment date. Quantitative milestone reports, as required under the CAA, are due every 3 years until the area is redesignated to attainment, no later than 90 days after a milestone date. To receive a redesignation from "nonattainment" to "attainment," a state must submit a maintenance plan with its redesignation request. However, there is no requirement for a state to submit a redesignation request or maintenance plan; such requests are at the state's discretion.

6. Estimating the Burden of the Collection

This section provides information on the hours and costs associated with the information collection for the respondents (the affected state and local air agencies) and the EPA (regional and headquarters offices). Hours and costs are presented for the activities associated with each collection item for a nonattainment area (or portion thereof) in a given state, as well as the equivalent annual and present value cost estimates.

6(a) Estimating Respondent Burden

The estimated respondent burden represents the estimated staff time associated with the activities required to develop the relevant PM_{2.5} attainment plan or maintenance plan and redesignation request.

The estimated burden in this ICR is incremental to the estimated burden of other EPA environmental reporting obligations. The actual incremental burden is expected to vary across areas for a number of reasons, such as the severity of the nonattainment problem and whether existing federal and state emission reduction programs are projected to attain or maintain the NAAQS.

6(b) Remaining Nonattainment Areas for 1997, 2006 and 2012 PM_{2.5} NAAQS

Table 1 provides the list of areas and states that remain nonattainment for the 1997, 2006 and 2012 PM_{2.5} NAAQS that potentially may need to develop Serious area SIP revisions or

CAA section 189(d) SIP revisions, or could qualify for and choose to develop redesignation requests with a maintenance plan during the ICR renewal period. The bulk of the anticipated work for the majority of the nonattainment areas consists of developing maintenance plans. The total estimated burden hours for states that choose to develop and submit maintenance plans and redesignation requests for qualifying areas is 300 hours over 3 years.

However, the Fairbanks, AK; Los Angeles-South Coast, CA; Plumas, CA; and San Joaquin Valley, CA, nonattainment areas may be determined to have missed applicable Serious area attainment dates during the ICR period, and could have one or more Serious area CAA section 189(d) SIPs (or portions thereof) due within 12 months of the applicable attainment date (also within the period for this ICR renewal). For the purposes of this analysis, the estimated burden for development of SIP revisions required to address Serious area requirements is 18,000 hours over 3 years.

Table 2 below summarizes the number of collection items (e.g. Serious area attainment plans and redesignation requests) that states may be anticipated to develop, and it provides a 3-year breakdown of expected burden hours by state.

As a starting point for developing burden estimates for this analysis, the Agency looked at the total hours expended in related EPA level of effort work assignments for meeting the 1997 ozone NAAQS, exclusive of the air quality modeling. The total estimate for ozone areas classified as Marginal was about 2,000 hours in level of technical effort.³ The estimated burden for a subpart 4 PM_{2.5} SIP revision was considered similar to the burden for ozone areas classified as Moderate, and estimated at 9,000 hours. The estimated burden for a subpart 4 PM_{2.5} SIP revision after an area was reclassified to Serious was considered similar to ozone areas with higher classifications and estimated at 18,000 hours.

For the purposes of this analysis, the assumed allocation of total incremental burden across the 3 years is divided evenly. Table 2 provides a 3-year breakdown of expected burden hours by state and by year.

Table 2. Nonattainment Areas for 1997, 2006 and 2012 PM_{2.5} NAAQS: Estimated Incremental Burden Hours by State and Year

State	EPA Region	No. of Areas or Parts of Areas	Additional hours Year 1	Additional hours Year 2	Additional hours Year 3
AK	10	1	6,000	6,000	6,000
AZ	9	2	200	200	200
CA	9	6	18,400	18,400	18,400
ID	10	2	200	200	200
MT	8	1	100	100	100
OR	10	2	200	200	200
PA	3	1	100	100	100
UT	8	3	300	300	300

³ EPA Contract No. 68-D-00-283; Work Assignments 3-53 and 4-66.

State	EPA Region	No. of Areas or Parts of Areas	Additional hours Year 1	Additional hours Year 2	Additional hours Year 3
Total		18	25,500	25,500	25,500

6(c) Estimating Respondent Cost

Labor costs are estimated for state and local governments using the total of projected burden hours for current nonattainment areas for the 1997, 2006, and 2012 PM_{2.5} NAAQS. These estimates do not reflect staff experience or economies of scale. The hourly rates are the result of estimated direct and indirect cost per employee. The main source of the information is <http://www.opm.gov/oca/payrates/index.htm>.

The estimated weighted direct salary cost per employee is \$43.02 per hour. This results from a summation of the professional, managerial, and support staff components.

- Hourly equivalent 2019 salary of permanent professional staff at GS 11, Step 3 is \$35.47 This is the average of hourly equivalent rates for the San Francisco, CA and Washington, D.C. areas.
- To account for permanent managerial staff, 1/11 or 9.1% of the hourly rate for GS 13, Step 3 is added to the professional staff hourly rates. The average hourly equivalent rate for GS-13 using rates for San Francisco, CA and Washington, D.C. is \$50.46, of which 9.1 percent is \$4.60.
- To account for permanent support staff at GS-6, Step 6, 1/8 or 12.5% of the hourly rate is added to the professional staff hourly rates. The average hourly equivalent rate for GS-6, Step 6 using rates for San Francisco, CA and Washington, D.C. is \$23.60, of which 12.5 percent is \$2.95.

The estimated hourly indirect cost per employee is \$24.95. This amount is the sum of the following:

- Benefits at 16% of the weighted direct hourly equivalent salary cost per employee, or \$6.88.
- Sick and annual leave at 10% of the weighted direct hourly equivalent salary cost per employee, or \$4.30.
- General overhead at 32% of the weighed direct hourly equivalent salary cost per employee, or \$13.77.

The estimated total weighted direct and indirect hourly equivalent salary cost per employee is therefore \$67.96 (= \$43.02 + \$24.95, with any differences due to rounding). The estimated annual incremental respondent burden for the state respondents to make the anticipated plan submissions in current year dollars is provided in Table 3.

Table 3. Estimated Annual Incremental Hour and Cost Burden for the States (Respondents) to Fulfill the PM_{2.5} SIP Submittal Requirements (including Optional Maintenance Plans)

No. of Areas or Parts of Areas	Burden for the 3-year ICR period	Annual Cost for Year 1	Annual Cost for Year 2	Annual Cost for Year 3
18	76,500 hours	\$1.73 million	\$1.73 million	\$1.73 million

6(d) Estimating Agency Burden and Cost

The estimated agency burden is derived from the same estimates used for estimating respondent costs in section 6(c).

The respondent burden was summed for each EPA Regional office and a percentage factor was applied to the yearly respondent burden estimate to reflect the burden associated with EPA Regional office activities for each SIP submission. Once yearly burdens were estimated for the Agency's Regional offices, a percentage of those amounts was used to derive estimates for the Agency's headquarters office burden.

Agency Regional Office Burden. The Agency Regional office burden is presumed to be 10% of the estimated total incremental burden for respondents. The total incremental burden allocation for the Agency Regional offices is divided evenly over the 3-year period.

Agency Headquarters Burden. The Regional office burden estimates for years 1, 2, and 3 are multiplied by 10% to arrive at an estimate for headquarters burden for the same 3 years.

Total Incremental Burden for the Agency. The EPA regional and headquarters office burden estimate for each year is 2,805 hours.

Total Annual Cost for the Agency. Using the weighted direct and indirect salary equivalent hour rate derived in section 6(c), the total incremental burden hours are multiplied by that rate for a total annual cost to the Agency of \$190,627.

Table 4. PM_{2.5} NAAQS Total Incremental Agency Universe Burden and Cost Estimates

Entity	Average Yearly Burden (hours)	3-Year Burden (hrs)	Present Value of Costs for 3-Year Burden
Agency	2,805	8,415	\$0.53 million

Costs for years 2 and 3 are calculated using the equation $\text{Present Value} = \text{Future Value} / (1 + \text{interest rate})^t$, where “t” is the number of years hence (i.e., 0 for year 1, 1 for year 2, 2 for year 3). The adjusted values for years 1, 2, and 3 are then summed.

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

Table 5. PM_{2.5} NAAQS Total Incremental State and Agency Universe Burden and Cost Estimates

Entity	Average Yearly Burden (hours)	3-Year Burden (hrs)	Present Value of Costs for 3-Year Burden
States	25,500	76,500	\$4.8 million

Costs for years 2 and 3 are calculated using the equation $\text{Present Value} = \text{Future Value} / (1 + \text{interest rate})^t$, where “t” is the number of years hence (i.e., 0 for year 1, 1 for year 2, 2 for year 3). The adjusted values for years 1, 2, and 3 are then summed.

6(f) Reason for Change in Burden

The EPA expects there to be a reduction of 65,100 hours in average annual burden during the period covered by this ICR (February 1, 2020-January 31, 2023) compared with the information collection that is currently approved by OMB. This decrease is due to the fact that the number of areas for which states have ongoing attainment planning obligations has decreased greatly. For the three-year period from February 1, 2017 to January 31, 2020, EPA estimated that 31 nonattainment areas would have planning requirements for the current. For this renewal, the EPA estimates that only 18 nonattainment areas will have planning requirements to meet during the renewal period (February 1, 2020-January 31, 2023). Three of the areas are nonattainment for multiple PM_{2.5} NAAQS, thus allowing those affected states to take a streamlined approach to meeting their ongoing planning requirements.

The estimates in this renewal have been calculated using 2019 dollars and some assumptions regarding overhead, O&M costs, and capital costs have been adjusted to meet current guidelines and common procedures for preparing ICRs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 3,188 hours per state/respondent. 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.

The EPA has established a public docket for this ICR under Docket ID Number: EPA-HQ-OAR-2013-0691, which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744. An electronic version of the public docket is available at www.regulations.gov. This site can be used to view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number: EPA-HQ-OAR-2013-0691 and OMB Control Number 2060-0611 in any correspondence.