

Chapter 7 ESTIMATED ADMINISTRATIVE BURDEN AND COSTS ASSOCIATED WITH THE FINAL REGIONAL HAZE RULE

7.1 Introduction

This chapter summarizes the information contained in the Environmental Protection Agency's (EPA) Information Collection Request (ICR) (EPA #1813.02). Under the Paperwork Reduction Act, the EPA is required to assess the burden hours and dollar cost for governments to administer the Regional Haze (RH) rule as well as the periodic reporting and recording keeping necessary to maintain the rule once it has been approved.

An ICR must be renewed every 3 years and cannot extend more than 3 years into the future without resubmittal for renewal. For the time period mid-1999 to mid-2002 covered by the RH ICR, data items are primarily limited to those of section 309(d)(4) of the Clean Air Act for nine western States. Those States and associated Tribes have created the Western Regional Air Partnership to foster coordination in addressing visibility issues. Those States are ahead of others in the nation in the RH goal establishment and emission strategy development process.

For the other States and Tribes, more of the administrative burden hour and cost burdens will accrue during the first long-term planning and strategy period (e.g., ~2004 to 2018). However, imposition of such burdens cannot be approved, even in part, until future review cycles and subsequent ICR submittals

As explained in Section 7.3, relative to control strategy costs, the estimated administrative burden hour and other costs are small.

7.2 Administrative Burden Hour and Cost Estimates for the First Information Collection Request (ICR) Period (1999 to 2002)

Nine western States are ahead of most other parts of the country in terms of their planning, analysis, and emission management strategy assessment. That fact is reflected in the ICR submittal to the Office of Management and Budget (OMB).¹

¹ The Regional Haze control strategy analysis abstracted from the substantial progress made by the western States in their cooperative venture to address visibility impairment.)

As noted in Section 7.1, the ICR is developed and approved in compliance with the Paperwork Reduction Act. Such requests are approved for a 3-year period and are submitted to OMB with updates and approval requests for future years. Consequently, the EPA does not have an ICR pertinent to 2015, a year near the end of the first long-term strategy period.

Because the ICR which has been prepared for submittal to OMB reflects just the early years of rule implementation, it understates the administrative costs associated with the RH rule during the first long-term strategy period. In the first ICR request period (1999 to 2002), most of the burden hour and cost estimates are related to the activities of nine western States who are further along in the rule implementation process. During that period, it is anticipated the other States will have some costs, these will be related to activities such as familiarizing themselves with the general nature, milestones, and framework of the rule.

According to the ICR submitted with the final RH rule, the first 3 years will result in an estimated total labor burden on the States of from 22,200 to 37,025 hours. The corresponding estimates for the federal government are 1,890 to 3,983 hours. The estimated cost for the States and associated federal government activities is \$0.8 to \$1.4 million annually. These estimates are in 1990 dollars.

7.3 Bounding of Estimated Administrative Costs for the 2015 Analytical Year

It should be recognized that there is a sequencing regarding the administrative and control cost outlays. Planning, monitoring, analysis, goal establishment, and emission strategy development for the first long-term planning and strategy period come before design, construction, installation, and operation of control measures. But, regardless of that timing difference, there may be an upper bound that one could place on the administrative costs to put them in context relative to the costs associated with control measures and strategies.

The administrative costs are expected to be less than ten times the estimates in the current ICR submittal toward the end of the first long-term strategy period. However, if they are ten times as high as those in the ICR submittal, they would range from \$8 million to \$11.4 million annually. This is clearly an upper bound estimate, since so many Class I areas can meet a variety of progress goals in the first long-term strategy period without additional control measures mean less planning and administrative activities on the part of the governmental sector. However, were such costs to be incurred, those administrative costs would represent between 0.2 percent and 1.5 percent of estimated control strategy costs. This range reflects the range of control strategy costs resulting from consideration of different control strategy cases and illustrative progress goals. See Chapter 6, Tables 6-13 and 6-14.