

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

AIR STATIONARY SOURCE COMPLIANCE AND ENFORCEMENT INFORMATION REPORTING (Renewal)

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE OF THE INFORMATION COLLECTION

Air Stationary Source Compliance and Enforcement Information Reporting (Renewal),
EPA ICR Number 0107.11, OMB Control Number 2060-0096, EPA-HQ-OECA-2014-0523

1(b) ABSTRACT:

Air Stationary Source Compliance and Enforcement Information Reporting is an activity whereby State, Local, Tribal, Territorial and Commonwealth governments (hereafter referred to as "delegated agencies") report air stationary source compliance and enforcement information to the U.S. Environmental Protection Agency (the EPA or the Agency) on a regular basis. The information is provided to the EPA via input to the Integrated Compliance Information System (ICIS). ICIS replaced the Air Facility System (AFS) as the database of record for this information. The modules within ICIS that are used to report Air related data are collectively referred to as ICIS-Air. ICIS contains compliance and enforcement information on thousands of facilities regulated under numerous federal statutes including the Clean Water Act – National Pollutant Discharge and Elimination System (NPDES) program. The majority of delegated agencies maintain their own data systems and extract data from it and report it to ICIS either electronically or manually. A small number of delegated agencies use ICIS as their only data system. The information provided to the EPA includes source information, compliance monitoring activities, violation determinations, and enforcement activities. The EPA uses this information to assess the health of the compliance and enforcement program established under the Clean Air Act (CAA). The EPA also uses ICIS to record comparable federal activities.

(i) Terms of Clearance

The following Terms of Clearance were given by OMB in the prior ICR, 0107.10:

"In accordance with 5 CFR 1320, the collection is approved for 3 years. The agency has indicated it anticipates system modernization changes as described in the Supporting Statement to occur between 2013-2014 and that it will timely submit a request for revision with substantive changes upon completion of that modernization effort. Upon resubmission, it is further suggested that EPA pay close attention to burden estimates and reassess expected burden changes."

ICIS-Air Implementation:

The EPA Office of Compliance replaced AFS with ICIS-Air, a modern, web-based data system, via a multi-year modernization project to improve the ability of EPA and delegated agencies to share and manage information regarding CAA compliance and enforcement programs. The Agency completed replacement of AFS with ICIS-Air in October 2014. There will be subsequent releases of ICIS-Air as new functionality is developed. Due to the enhanced functionality provided by a web-based system and the superior electronic data transfer process ICIS-Air utilizes, the Agency expects the overall burden of data reporting to be less than what delegated agencies experienced using AFS.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED/AUTHORITY FOR THE COLLECTION

(i) Authority

The CAA calls for state, local, federal and tribal governments to implement the Act in partnership to reduce pollution. It is well understood that working closely with government partners leads to better programs that are more effective and efficient. For regulatory programs, EPA often has discussions early in the rulemaking process with government partners (federal, state, local and tribal) and with interested parties such as affected industries, environmental groups, and communities. After a rule is complete, EPA works with government partners and stakeholders to achieve effective implementation. This ICR supports the partnership established for CAA program implementation by facilitating regular information exchange. Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), establishes that EPA may request information on a one-time, periodic or continuous basis for the purpose of carrying out any provision of the Act. Individually, certain provisions of the Act and its implementing regulations include specific language for the collection of some of the information requested by this ICR. For example, 110(p) of the CAA, 42 U.S.C § 7410(p), establishes that EPA may request information to assess the implementation of any state implementation plan. 40 CFR § 70.4(j)(1) (title V) requires that any information obtained or used in the administration of a title V permit program be available to EPA. This ICR encompasses this information in addition to information that assists with carrying out additional provisions of the Act. Related provisions include but are not limited to New Source Performance Standards (NSPS) in 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61 and Part 63, and New Source Review (NSR) permitting regulations in 40 CFR Part 51 and Part 52. The periodic reporting of regulated source information, compliance monitoring, violation determination, and enforcement information is the subject of this renewal ICR.

(ii) General Need for the Data

The national air stationary source compliance monitoring and enforcement program promotes effective, cooperative, and coordinated efforts among the EPA and the delegated agencies. The Agency recognizes the primary role of the delegated agencies in the prevention and control of air pollution. But, the CAA requires that EPA regularly monitor delegated

agencies to ensure adequate implementation and enforcement of delegated and authorized programs. To do this, the EPA has identified the minimum amount of data or the Minimum Data Requirements (MDRs) it believes is necessary to manage the national air stationary source compliance monitoring and enforcement program within this ICR. Reporting the MDRs, which are listed in Table 1 in Section 4(b), is critical in order to:

- Manage the national CAA compliance and enforcement program to ensure effectiveness and consistency;
- Oversee state/local/tribal efforts and assess progress in achieving protection of the environment and public health;
- Target compliance activities and enhance ability to use advanced monitoring tools;
- Improve efforts to achieve health and environmental benefits envisioned by our regulations and permits;
- Increase transparency and meet public expectations for readily accessible and detailed information; and
- Provide complete and timely responses to inquiries (e.g., Congress, OMB, public).

In addition to the regulatory infrastructure the data supports, it also allows the Agency to effectively implement our compliance and enforcement guidance and policies. These are:

- The Clean Air Act Stationary Source Compliance Monitoring Strategy, July 14, 2014 (CMS) – The CMS establishes a baseline compliance monitoring program with emphasis on CAA Title V major sources (as defined by CAA §501(2)) and a limited subset of synthetic minor sources, while providing delegated agencies with the flexibility to address local air pollution and compliance concerns. The CMS also establishes a framework of minimal data requirements for reporting to the EPA. Data included in this ICR is a critical component of the implementation of the CMS.
- The Clean Air Act National Stack Testing Guidance, April 27, 2009 – The EPA developed the stack testing guidance to improve uniformity in conducting stack tests and promote coordination among the EPA and delegated agencies. ICIS-Air is the Agency’s repository for stack test data regarding compliance with CAA regulations.
- The Guidance on Federally-Reportable Violation for Clean Air Act Stationary Sources, September 23, 2014 (FRV policy)– The EPA developed the 2014 FRV policy to balance a commitment to share information with the public about violations of CAA regulations that affect their communities with the need to prioritize the use of limited resources available to delegated agencies. The FRV policy supports the Agency in managing the national CAA compliance and enforcement program. ICIS-Air is the Agency’s repository for data pertaining to federally-reportable violations, which are violations of federally-enforceable regulations.
- The Enforcement Response Policy for High Priority Violations of the Clean Air Act, August 25, 2014 (HPV policy) – The EPA developed the 2014 HPV policy to help

Federal, state, local and tribal delegated agencies prioritize enforcement efforts with respect to sources of air pollution. The HPV policy addresses a subset of federally-reportable violations, called high priority violations (HPVs) that the Agency believes warrant additional oversight to ensure that delegated agencies respond to such violations in a timely and appropriate manner and, if needed, have access to federal assistance. ICIS-Air fully supports reporting HPV activity: the discovery action, notice/advisement provided to the regulated entity, addressing the violation, and resolution of the violation and enforcement action.

Data concerning stationary source compliance monitoring and enforcement programs is critical to conducting oversight of delegated agency compliance and enforcement programs. The EPA Office of Enforcement and Compliance Assurance (OECA), the Environmental Council of States (ECOS), state media associations, and other delegated agency representatives developed a framework for conducting consistent reviews of core monitoring and enforcement activities pursuant to the CAA, Clean Water Act (CWA), and the Resource Conservation and Recovery Act (RCRA) programs. Reviews were initiated in 2004, and have occurred in 4-year cycles. The data reported to ICIS-Air is paramount for these reviews. Each review begins with an analysis of data metrics to identify any obvious trends or issues. The SRF reviews are a platform for collaborative problem solving regarding compliance monitoring, enforcement, and data management.

Specific data from ICIS-Air will be provided to the EPA Web site, Enforcement and Compliance History Online (ECHO) (<http://www.epa.gov/echo>), which allows the public to access compliance and enforcement information for multiple statutory programs on approximately 800,000 regulated facilities nationwide. ECHO is updated via weekly data extracts from ICIS. ECHO allows the public to retrieve information about CAA regulated sources as well as EPA and delegated agency compliance evaluations, violation determinations, and enforcement actions. In addition to ECHO, data from ICIS is included in the EPA's ENVIROFACTS, a web tool developed and maintained by the EPA Office of Environmental Information (<http://www.epa.gov/enviro/index.html>) that allows the public to retrieve data from a multitude of EPA databases. ICIS-Air data also will be used as part of performance measures satisfying the Government Performance Results Act requirements.

(iii) Reasons for New Data as Part of this Renewal ICR

This renewal introduces the following policy changes that resulted in the way that violations are to be reported. These changes will effectively reduce the reporting burden compared to the current ICR that was approved in January 2012:

- *Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources (FRV policy) and Data:* In coordination with national and regional organizations representing air compliance and enforcement programs as well as with individual delegated agencies, on September 23, 2014, the EPA issued a revised FRV policy which superseded the 2010 FRV clarification memo. The EPA developed the revised FRV Policy in response to

concerns raised by delegated agencies regarding resource constraints and reporting burden associated with the 2010 FRV Clarification Memo.

FRV reporting is important, as it supports the Agency in managing the national CAA compliance and enforcement program. The collected data supports: policy analysis and evaluation; targeting efforts; and meeting public expectations for accessible, detailed information.

The revised policy reduces the overall reporting burden by changing the method for reporting violations and through a change to limit the universe of sources whose violations of federally enforceable requirements are reportable. In AFS, to report a violation, agencies changed the compliance status of a regulated pollutant to “in violation.” The delegated agency then had to change the compliance status back to in compliance once the violation was resolved. This process was a multi-step process that required the same piece of data to be update at least twice. It was referred to as tracking compliance status. The revised FRV policy replaced tracking a compliance status with reporting a violation. Agencies now report the violation one time. Once the violation is reported by selecting a violation type, agencies do not have to touch that specific piece of data again.

In addition to the method of reporting a violation, the new applicable universe of sources is: Title V Major Sources; SM-80 sources; sources included in a CMS plan; and any source at which a HPV has been identified. This source universe provides consistency between compliance monitoring policies and violation reporting for the delegated agencies. The previous applicable universe included: all synthetic minor sources, minor sources subject to a Part 61 NESHAP regulation, and any source subject to a formal enforcement action. The narrowed universe of sources is anticipated to result in improved data completeness and accuracy.

As stated in the revised policy, FRVs are violations of federally enforceable CAA requirements at a source within the applicable universe stated above. FRVs include violations of any emission limit, emission standard, or surrogate parameter. They also include procedural violations such as failure to maintain reports and underlying records as required by permit or regulation; failure to timely test or conduct valid monitoring as required by permit or regulation; failure to timely report; failure to construct, install, or operate facility/equipment in accordance with the permit or regulation; failure to obtain or maintain a permit; work practice violation; and violation of consent decree, court order or administrative order.

To report an FRV into ICIS-Air, a delegated agency creates a Case File. Once the Case File is created, the delegated agency is to report the violation type, the applicable federal air program or the state or local regulation, pollutant(s), where applicable, associated with the violation, and the date the FRV determination was made. If no date is reported, the date the FRV is reported in ICIS-Air will be set as a default date. FRVs are expected to

be reported within 60 days of when the determination is made that a violation occurred. The Case File in which the FRV was reported may be designated as “enforcement sensitive” in ICIS-Air, but once the source is notified of the violation(s) or a formal enforcement action is issued or entered by a court, the designation should be removed by either linking an enforcement action record to the Case File or removing the enforcement sensitive flag from the Case File.

- *The Enforcement Response Policy for High Priority Violations of the Clean Air Act (HPV policy):* The most recent revision to the HPV policy was issued August 25, 2014, superseding the 1998 version. The HPV policy addresses a subset of federally-enforceable CAA violations, called High Priority Violations (HPVs) that the EPA believes warrant additional oversight to ensure that delegated agencies respond to such violations in a timely and appropriate manner and, if needed, have access to federal assistance. The policy provides criteria used to identify an HPV.

The revised 2014 HPV policy reflects two substantial changes from the 1998 policy that will reduce the reporting burden of the delegated agencies. First, the EPA has focused the criteria of what constitutes an HPV on those violations that are the most likely to be significant for human health and the environment or for maintenance of strong CAA programs. In doing so, the Agency has replaced the ten General Criteria and the Matrix Criteria with six Criteria. The EPA expects that fewer violations will be classified as an HPV, and as such there will be a significant reduction in reporting.

Second, the EPA determined that even when a violation falls within a category of HPVs, not every such violation warrants additional tracking and attention at a national level. Although prompt identification and communication is a key element in resolving a violation, if it is later determined that such violation does not warrant additional tracking, delegated agencies can reprioritize their efforts. The revised HPV policy provides explicit mechanisms implemented in ICIS-Air to remove the matter from HPV oversight. Because these decisions will be made explicitly and earlier in the process, the EPA expects that delegated agencies will not need to continue to consult with the EPA and report on violations that no longer warrant the additional oversight.

To report an HPV into ICIS-Air, a delegated agency creates a Case File. Once the Case File is created, the delegated agency reports an HPV by selecting a violation type associated with an HPV, the applicable federal air program or the state or local regulation, pollutant(s), where applicable, and the date the violation was determined to be an HPV. This date is referred to as the Day Zero date. HPVs are expected to be reported within 60 days of when the determination is made. The Case File in which the HPV was reported may be designated as “enforcement sensitive” in ICIS-Air, but once a source is notified of the violation(s) or a formal enforcement action is issued or entered by a court, the designation should be removed by either linking an enforcement action record to the Case File or removing the enforcement sensitive flag from the Case File.

(iv) Opportunities for New Data

As agencies become familiar and comfortable with reporting to ICIS-Air, EPA believes opportunities for new data will be realized. Over the course of this ICR, EPA would like to evaluate the following data for possible inclusion in future ICRs:

- *Source Reported Compliance Status* - The requirement to report a compliance status for each review of a title v annual compliance certification was eliminated. In lieu of this, the Agency would like to explore reporting the compliance status reported by the source on the annual certification.
- *Title V Compliance Certification Period Covered* - Because some title V permits require quarterly or semi-annual compliance certifications, it is beneficial for the period covered by each certification to be reported in these cases.
- *Subparts for all sources with a title V permit* – If the subpart is included in a title V permit, it is readily accessible and easily reported.
- *Source Classification* – A source level classification in lieu of a pollutant level classification.
- *Linking a Notification to a Case File* – Currently, the discovery action, addressing action and resolving action are linked to a Case File that includes an HPV. Adding the notification would fill the gap in the pathway.
- *Violation Start and End Date* – Where a start and end date can be determined, it would be beneficial to the public to report this information. The determination may be based on self-reported (e.g., excess emissions reports, etc.) information or determined through compliance evaluations.

(b) USE/USERS OF THE DATA

There are many ways in which the EPA, delegated agencies, and the public use the data included in this ICR. As stated previously, the MDRs represent the minimum amount of data the Agency believes is necessary for effective management of the national air stationary source compliance monitoring and enforcement program. Some of the key uses of the data on a national basis are to:

- Provide an accurate and accessible inventory of sources subject to federally enforceable regulations;
- Support better (“smart”) targeting and enhanced enforcement strategies;
- Provide the public with transparent access to compliance monitoring and enforcement

activities, while providing facilities with an incentive to fix compliance problems;

- Support essential oversight activities;
- Assist in identifying national trends and issues related to the CAA;
- Develop measures of regulatory program success;
- Communicate performance and results on a national, regional, sector, or other level;
- Standardize delegated agency reporting to EPA;
- Assist regulatory analyses and design of new regulations;
- Support multimedia initiatives which integrate quarterly reports of air, water, and land compliance data;
- Provide timely and accurate response to information requests made by citizens, the regulated community, Congress and other information requesters; and
- Provide a forum and model of successful delegated agency compliance programs (that include Federal data reporting) which can be used by other agencies in the development or expansion of their existing programs.

(c) ABOUT ICIS

ICIS is a data system designed to track compliance and enforcement information. It is a modern web-based system which provides easy access to historical and current records for the EPA, and state/local/tribal agency staff involved in compliance and enforcement activities. Within ICIS, there are data modules specifically for reporting compliance and enforcement data pertaining to activities related to the CAA. These modules are collectively referred to as ICIS-Air. The following are important facets of ICIS:

- ICIS provides both electronic submission and Graphical User Interface (GUI) capabilities.
- ICIS provides modern and streamlined methods for electronic transfer of data.
- ICIS implements robust security features to ensure the integrity of the software and data, protect confidentiality of data, and maximize availability to users.
- ICIS follows the EPA standards for software and hardware development, including the use of the Central Data Exchange (CDX) and EPA/ECOS data standards.
- ICIS supports baseline MDRs necessary to support the national air stationary source enforcement and compliance assurance program.
- ICIS contains a set of streamlined data entry screens with maximized system-generation of data based on user permissions and types of records being reported.

ICIS is designed to meet the currently approved MDRs. Hence, the type of information (e.g., basic facility information, CMS data, applicable air programs, regulated pollutants, actions, and violations) reported into the new system remains essentially the same. However, due to the design of the new system, there are changes to how the current MDRs are reported.

To navigate to the appropriate screen on which data is reported, ICIS-Air requires an initial indication of the type of activity to be reported (e.g., Inspection/Evaluation). In spite of this additional step for reporting, we anticipate significant efficiencies in reporting and an overall reduction in reporting burden for both direct users, as well as those using electronic data transfer (EDT) to report MDRs. System efficiencies will be realized through several means such as:

- (1) ICIS-Air auto-populates data fields to the greatest extent possible based on the record type being added or type of agency (e.g., state) associated with the user adding the record.
- (2) Drop-down menus of values and type-ahead functionality are provided wherever possible to facilitate entry of information, provide greater consistency in data entry, eliminate the need to refer to multiple lists of regional action types, and improve overall data quality.
- (3) The technology and capabilities of the new EDT process are a vast improvement over the current AFS direct batch process and the “Universal Interface.”

(d) PROGRAM CHANGES

There are a few changes in the MDRs. For example, the MDR for “Compliance Status” is being streamlined so that the compliance status of an air program pollutant will no longer be required, nor will it be required to subsequently be changed to reflect a return to compliance. Instead, only violations will be reported into the new system. This change is being made at the request of delegated agencies. Also, delegated agencies will no longer be required to report the MDR for “Attainment Status.” The new system will automatically obtain this information from the EPA Facility Registry System (FRS). In addition, as referenced above, the method for reporting MDRs has changed resulting in some new elements of data necessary to report the MDRs. For example, delegated agencies will report whether their enforcement response is administrative or judicial, whereas in AFS, the type of enforcement was inherent in the action reported. While EPA is not covered in this ICR, to ensure complete national tracking and transparency, there is an expectation that EPA will implement this ICR where appropriate. For example, EPA will report compliance monitoring activities for which they were the lead agency, and all enforcement actions issued or entered.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

(a) NON-DUPLICATION

The MDR elements outlined in Table 1 of Section 4(b) represent minimum data

requirements for effective implementation and management of a compliance and enforcement program. For EPA and the public, the ICIS data will be the only national repository of information on CAA stationary source compliance and enforcement activities. This ICR relates to information that delegated agencies generally collect as part of their customary business practice to manage their compliance and enforcement programs. A relatively small number of delegated agencies will use ICIS as their sole data system for managing the MDRs and other data elements. The majority of delegated agencies have their own data management systems and will be reporting information they manage in their own system to ICIS-Air. Roughly one third of the reporting delegated agencies will report data using electronic data transfer (EDT).

Agencies that report data to ICIS-Air via EDT submit their data in Extensible Markup Language (XML) format. To facilitate the submission of data, plug-ins have been developed for agencies to extract the data requested by this ICR and convert it into XML submission files that are submitted to ICIS via the EPA's Central Data Exchange (CDX). To support state agencies with creating their own customized code for extracting, formatting, and submitting their data to ICIS or with using a plug-in for their EDT process, \$3,055,606 was awarded in Exchange Network grants in FFY 13 and 14. Some of the grants awarded included other goals not directly related to ICIS-Air (e.g., support the Air Quality System).

(b) PUBLIC NOTICE REQUIRED PRIOR TO SUBMISSION TO OMB

EPA published a Federal Register notice on August 21, 2014 soliciting public comments for 60 days. EPA received ten comments (see section below for a full discussion of these comments). EPA will publish a second Federal Register notice soliciting comments for 30 days concurrently with the submission of this ICR to OMB.

(c) CONSULTATIONS

The requirements for ICIS-Air were developed by committee that included state and local agencies, EPA regional staff and organizations, like the National Association of Clean Air Agencies, representing multiple delegated agencies. In addition, the design phase of ICIS-Air included two similarly comprised workgroups that focused on migration of data from AFS to ICIS-Air and the design of the web Graphic User Interface (GUI); and an Integrated Project Team that focused on the EDT process. These groups met between July 2013 and October 2014. This collaborative design and development process was initiated to ensure clear communication of Agency plans; hear, understand and consider delegated agency perspectives; encourage delegated agencies to participate as partners in ICIS-Air development tasks; and help the EPA understand the barriers that delegated agencies face in achieving a major information system transition.

EPA initiated additional consultations with air agencies in order to collect estimates of one-time burden associated with transitioning air compliance and enforcement reporting from AFS to ICIS-Air, and separately to collect annual estimates of the relative time to report to ICIS-Air via EDT versus reporting to AFS via batch processes. The feedback EPA received is

summarized in Section 6(a) Estimating Respondent Burden.

The first FR notice for this ICR was published August 21, 2014. Comments were received from six delegated agencies, one association, and three anonymously. Where appropriate these comments were addressed by this ICR. Some of the comments received were directly related to this ICR but EPA will fully respond. In addition, to develop the burden estimate state and local agencies were consulted.

Comments and Agency Responses:

In response to the first FR Notice (79 FR 49511), we received comments from 10 entities. Comments generally focused on two areas: clarification of the federally-reportable universe, and our method for estimating the burden associated with reporting to ICIS-Air. At this time, EPA is not changing the list sources that comprise the federally-reportable universe. However, EPA will discuss further whether the universe should change and how. Specifically, EPA will focus its discussion on sources that are only reportable because they are subject to a formal enforcement action. To clarify the federally-reportable universe and its relationship to the CMS, FRV and HPV policies, we offer the following:

- The federally-reportable universe is broader than the universe of sources included in the CMS, FRV and HPV policies. It is EPA's expectation that all minimum reportable activities (identified in Table 1 of this ICR), which includes informal and formal enforcement actions, would be reported against the federally-reportable universe. The FRV and HPV policies reduce the burden of reporting violation determinations only. For sources that are only reportable because they were subject to a formal enforcement action, any minimum reportable activity that occurs after the formal enforcement action was issued or entered should be reported.
- Because a source is part of the federally-reportable universe does not mean that a FCE must be completed at the source. The EPA Stationary Source CMS policy, which establishes EPA's recommendations for completing FCEs, focuses on title V majors and 80% synthetic minor sources. These facilities are a subset of the federally-reportable universe. But, if an FCE is completed at a federally-reportable source, it is EPA's expectation that the FCE would be reported.

In response to the comments regarding our claim that ICIS-Air will result in an overall burden reduction, see Section 6 of this ICR for the methodology and results of a limited burden assessment. This limited assessment does include a one-time estimate of the resources required to participate in the design and development of ICIS-Air. Some agencies opined that previous assessments significantly underestimated the actual burden of reporting to AFS.

In light of the transition to ICIS-Air, EPA may decide to renew this ICR in less than three years.

(d) EFFECTS OF LESS FREQUENT COLLECTION

During this ICR renewal process, the EPA is not requesting any changes to the reporting timeframes. The 2012 ICR renewal included a change from quarterly reporting to within 60 days of the day of the event. This request was made to ensure that the data used by the Agency was accurate and as timely as possible, and provided the public with current. Data received quarterly did not provide capability for meaningful reviews at mid-year and end of year. Concessions were made in the last ICR for the timeliness of reporting the results of stack tests or performance tests. These activities are to be reported within 120 days of the conclusion of the test. This concession addressed regulatory allowances where the source is provided 60 days from the conclusion of the test to submit the results to the delegated agency. Agencies are then given another 60 days to review the test results to determine if a performance test passed or failed.

If the EPA received data less frequently (e.g., quarterly), there would be an adverse impact on the collaborative process for conducting compliance monitoring evaluations and ensuring violations discovered are addressed and resolved timely. In addition, the timeliness of making this information available to the public would suffer. The lack of timeliness would add to data quality concerns.

(e) GENERAL GUIDELINES

This information collection contains no special circumstances that would conflict with the general guidelines in 5 CFR § 1320.5.

(f) CONFIDENTIALITY

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see also 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 42251, September 20, 1978; and 44 FR 17674, March 23, 1979).

(g) SENSITIVE QUESTIONS

This section is not applicable.

4. THE RESPONDENTS AND THE INFORMATION COLLECTED

(a) RESPONDENTS/NAICS CODES

The respondents for the information collection activity are state, local, territorial, and tribal delegated agencies. These agencies are classified in NAICS 924110. Source compliance data assembled by delegated agencies covers numerous NAICS categories. Most contacts are identified on the EPA Web site (see Contacts List at <http://www.epa.gov/compliance/contact/data-afcontacts.html>). The total number of respondents

is 99 (50 states, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, the Mariana Protectorate and 43 local air pollution control agencies). The classification of small, medium, and large agencies is made based upon the number of major sources included in their federally-reportable universe: > 59 major sources is defined as a small agency, 60 - 349 is defined as a medium agency, and 350 or more major sources is defined as a large agency. But, in addition to major sources of which there are 13,742 active as of the drafting of this ICR, these delegated agencies track a significant number of non-major sources that are federally reportable (25,466 synthetic minors and 3,176 minors).

The list of agencies by category can be found in Appendix 1, Delegated Agency Classification by Size.

(b) INFORMATION REQUESTED

(i) Specific Data Reporting and Record keeping Items

Reporting: To manage the national air stationary source compliance monitoring and enforcement program, the EPA provides a set of MDRs that identify the specific data elements to be reported and tracked in ICIS-Air. The list of MDRs as reported to ICIS is found in Table 1, MDRs for Renewal. Because this is a transition period, Table 2 provides, for reference, the MDRs as reported to AFS. The data elements include source information, compliance monitoring activities, violation determinations and enforcement actions. Activities can be reported as either planned or completed. In general, the completed or concluded date is the relevant date for this ICR. Minimum reportable activities include compliance evaluations, investigations, performance tests and results, informal enforcement actions, and formal enforcement actions. In this section information is provided on each of these data elements.

A facility¹ is a stationary source, containing one or more pollutant-emitting units. It includes portable sources, which are stationary sources that can be moved from one physical location to another, such as an asphalt processing plant. Each facility is associated with one delegated agency. The delegated agency is identified by a unique combination of characters embedded in a facility's Programmatic Identifier. In ICIS-Air a facility record must exist before users can enter data for activities associated with that facility such as compliance evaluations and enforcement actions. Activities are to be reported when they occur at a facility that is part of the federally-reportable universe, which is comprised of all:

- Title V major sources,
- Synthetic minor sources,
- Sources subject to a Part 61 NESHAP regulation,
- Facilities included in a CMS plan,
- Facilities subject to a formal enforcement action, and
- Facilities with an HPV.

¹ The terms facility and source are used interchangeably throughout this ICR.

The Agency is aware that the federally-reportable universe included in this ICR differs from the universe of sources generally covered by the CMS, FRV and/or HPV policies. The CMS policy focuses on title V majors and 80% synthetic minor sources, the 2014 FRV policy reduced the universe of sources at which FRVs are to be reported to title V majors, 80% synthetic minors, sources on a CMS plan, and any source with an HPV; and the HPV policy generally applies to title V majors. This difference will result in compliance monitoring activities and enforcement actions being reported for sources not covered by these policies.

Compliance monitoring activities are evaluations of the compliance status of the facility. These activities include compliance evaluations (both partial and full), investigations, performance tests, and receipt and review of title v annual compliance certifications.

A compliance evaluation generally includes:

- A review of all required reports and the underlying records;
- An assessment of air pollution control devices and operating conditions;
- Observing visible emissions;
- A review of facility records and operating logs; or
- An assessment of process parameters, such as feed rates, raw material compositions, and process rates.

After a compliance monitoring activity is completed a review of all acquired materials against the regulatory framework and/or permit is conducted to determine if any violations occurred. Some agencies are authorized to make a violation determination during the compliance monitoring activity, while others are not. The 2014 FRV and HPV policies discuss when a violation is reported to ICIS-Air. To report a violation, delegated agencies must first create a Case File activity. Within the Case File, violations are reported by selecting a violation type and air program violated (e.g., New Source Performance Standards). Some violation types also require a pollutant (e.g., Violation of an Emission Limit). FRVs include violations of federally-enforceable rules and regulations, which include all limitations and conditions that are enforceable by the Administrator and citizens under the CAA or that are enforceable under other statutes administered by the Administrator.

If a violation determination is made, then typically a source is notified of such findings via an informal enforcement action. An informal enforcement action notifies or advises the recipient of apparent deficiencies, findings concerning noncompliance, or that the issuing agency believes one or more violations occurred at the referenced source and provides instructions for coming into compliance. An informal enforcement action offers an opportunity for the recipient to discuss with the issuing agency actions they have taken to correct the violations identified or provide reasons they believe the violations did not occur. An informal enforcement action may include reference to an issuing agency's authority to elevate the matter, and/or liability of the recipient to pay a penalty. This data is intended to ensure that the delegated agency informs the source as soon as possible of the agency's findings so that the source is on notice of the need to promptly correct conditions giving rise to the violation(s) or potential violation(s).

A formal enforcement action either requires that a person comply with regulations, requirements, or prohibitions established under the CAA; requires payment of a penalty or establishes an agreement to pay a penalty; initiates an administrative procedure (e.g., file a complaint) or civil action (e.g., referral); or constitutes a civil action. Generally these actions are referred to as complaints, settlement agreements, compliance or penalty orders, referrals, consent agreements, or consent decrees. In other words, formal enforcement actions have legal consequences if the source does not comply.

Additionally, all facilities subject to formal enforcement are to be tracked in ICIS until the resolution of the enforcement action, regardless of classification. For example, should a compliance order be issued to a facility that is not in a reportable universe, all information required to establish a facility record in ICIS-Air, including applicable air programs and pollutants, should be reported. The facility should have all reportable activities entered into ICIS-Air until resolution of the enforcement action.

In addition to the current MDRs, EPA will be soliciting feedback during the period covered by this ICR on existing and new data requirements. We are not requesting that comments be submitted on these elements in response to this ICR. The data elements for which feedback will be solicited, include, but is not limited to the data identified at 2(a)(iv) of this ICR. If warranted, the EPA may renew this ICR in less than three years.

Record keeping: Data provided to the EPA by delegated agencies will be maintained by the EPA in ICIS-Air and when appropriate transferred to the National Archives and Record Administration. Delegated agencies are not required to report these data elsewhere in other federal EPA systems.

(ii) *Respondent Activities*

The respondent (i.e., delegated agency) activities associated with reporting of compliance and enforcement actions include:

1. Process, compile, and review information for accuracy and appropriateness;
2. Transmit information for entry into ICIS-Air, including any necessary changes to delegated agency data systems to facilitate the transfer of MDRs; and
3. Affirm that the data has been transmitted accurately

These tasks generally are to be performed on a 60-day basis. Most of the burdens under Activity 1 are designated as Customary Business Practice, because the delegated agencies collect the majority of information required by the EPA for their own program management purposes.

Record Retention: Delegated agencies should maintain MDR data in ICIS for at least five (5) years with the exception of data pertaining to HPVs. Sources with HPVs are to be kept in ICIS-Air indefinitely regardless of operating status. In addition, ICIS-Air users may delete data

from the system that is no longer valid or that pertains to sources that are no longer federally-reportable or are permanently closed.

TABLE 1

ICIS-AIR: REPORTING MINIMUM DATA REQUIREMENTS – DELEGATED AGENCIES

This table shows provides the CAA stationary source compliance and enforcement minimum data requirements (MDRs) and where they are reported in ICIS-Air.

In some instances there is a difference between reporting requirements for web entry and electronic data transfer (EDT) in ICIS-Air. An example is an activity identifier. In ICIS-Air, agencies that will report using EDT will provide an activity identifier for each activity reported, agencies that will report via the web will have an activity identifier generated for them. This difference exists to allow EDT agencies to report an identifier generated by their state or local agency system. In this table, agencies that will report via the web are referred to as “web agencies,” and agencies that will report using EDT are “EDT agencies.”

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
Source Information			
Source/Facility Record	Facilities	Required Data Fields	A facility is a stationary source of pollutants including portable stationary sources. All sources included in the federally-reportable universe are to be reported.
	Facility ID	Programmatic ID	The Program ID is 18 alphanumeric characters comprised of the State or Tribe, LCON (where applicable), and 13 characters unique within the reporting agency. A facility is uniquely defined by its Programmatic ID. The Programmatic ID is provided by the delegated agency.
	Facility Name	Facility Site Name	The Facility Name would indicate the environmental relevance of the facility or reference the regulated activities (e.g., Joe’s Widget Manufacturing Facility). Name changes should be reported as soon as they are known.
	Street	Address	The address reported is the physical address of a facility. This is the address of the location where the emissions occur; not, for example, the corporate headquarters. If no physical address exists, delegated agencies may report a PO Box along with a latitude and longitude for the physical location of the facility.
	City	City (GNIS City Code or City Name)	The city can be reported in the City free text field or in the City Name (GNIS) field using the GNIS Feature ID. If no city is available, a corresponding value indicating such should be provided in the City text field (e.g., No City) with an accurate latitude and longitude reported.
	State	State	The postal state code that corresponds to the state in which the facility is physically located.
	County	County Name (GNIS)	A county is required if the City text field is used to report the City. If the City Name (GNIS) is used to report the City, the county will be set based on the

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			City Name (GNIS) reported.
	Zip Code	Zip Code	The zip code that corresponds to the physical location of the facility.
	NAICS Code	Primary NAICS Code	The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments. NAICS are assigned based on a facility's primary business activity. A complete and valid NAICS code contains six digits.
	Government Ownership	Facility Type of Ownership	Facility Type of Ownership reflects whether the facility is privately owned or owned by different levels of government. Although identification of the owner/operator can be defined down to the municipal level, at a minimum any federally owned/operated facility should be identified.
Air Programs	All Applicable Federally-Enforceable Air Program(s)	Required Data Fields	Air programs are CAA regulatory programs (e.g., Title V permits). All applicable air program codes are to be reported, but a plant should have at least one air program. Programs that are not delegated or enforced by a state or local agency are not required to be reported by delegated agencies (e.g., Mandatory GHG Reporting Rule, CFC Tracking (CAA title VI)). EPA should report these air programs, where applicable.
	Air Program	Air Program	An Air Program code represents a CAA regulatory program applicable to a facility. In cases where state or local regulations are stricter than federal regulations, reporting of the federal air program is sufficient. Another option available to delegated agencies is to report a general "Federally-Enforceable Requirement" and provide a state or local regulatory citation in a free text field. Typically state and local permits identify the permit conditions that are federally-enforceable. So, this information is readily available.
	Air Program Operating Status	Air Program Operating Status	An operating status must be reported for each air program. The Operating Status represents the operational condition of the unit(s) or processes to which the air program applies or the operational condition of the facility.
	Subparts for NSPS, NESHAP, MACT	Subparts	A subpart is associated with an air program. A subpart is required for NESHAP Part 61 regardless of facility classification. A subpart is required for NESHAP Part 63 and NSPS if the facility is a title V major. Part 63 and NSPS subparts are optional but encouraged for any non-major facility. Where Subpart A – General Provisions are incorporated into a source specific subpart wholly or by reference, delegated agencies do not also have to report Subpart A as an applicable Subpart.
Pollutants	Regulated Pollutant(s) by Air Program	Required Data Fields	All pollutants for which a source is regulated should be reported, but at a minimum each facility should have at least one pollutant.
	Pollutant Code or CASN	Pollutant Name or CASN	Pollutants reported include those for which a source is regulated.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
	Pollutant Classification	Delegated Agency Pollutant Classification	Pollutant classification indicates the rate at which a facility can potentially emit a pollutant. A pollutant classification is required for each pollutant. If a classification is not applicable, agencies may report "Not Applicable" as the classification.
CMS Record	CMS	Required Data Fields	The CMS Record identifies sources that are included on a CMS plan. This data is only reported for sources that are included on a CMS plan.
	CMS Source Category	CMS Source Category	The Source Category corresponds to the category defined by the CMS policy in which a facility is assigned based on its potential to emit (PTE). For the purposes of the CMS policy, PTE is the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.
	CMS Minimum Frequency Indicator	CMS Minimum Frequency	The Minimum Frequency is the minimum number of federal fiscal years recommended between full compliance evaluations at a source covered by the CMS policy. If the CMS policy includes a recommended minimum frequency for the CMS Source Category applied to the facility, the CMS Minimum Frequency will default to the policy recommended minimum frequency on the web. Delegated agencies may overwrite the Minimum Frequency. EDT agencies must submit the Minimum Frequency, it will not default.
Minimum Reportable Activities			
FCE Record	FCEs	Required Data Fields	A Full Compliance Evaluation (FCE) is a comprehensive evaluation of a facility. All FCEs should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the FCE to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency/On or Off Site)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific type of compliance evaluation performed. If any component of the evaluation was performed on-site, the FCE should be reported as on-site.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date	The actual end date is the date the reported activity occurred.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
PCE Record	PCEs	Required Data Fields	A Partial Compliance Evaluation (PCE) is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. PCEs are only required when they are a discovery action for an HPV or are included in a CMS alternative plan.
	Facility ID	Programmatic ID	Delegated agencies must associate the PCE to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency/On or Off Site)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation,). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed. If the PCE was conducted on-site, a delegated agency can report the specific evaluation activity conducted (e.g., PCE On-site Interview).
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date	The actual end date is the date the reported activity occurred.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
Investigations	Investigation Conducted	Required Data Fields	An investigation is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. All investigations conducted should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the investigation to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Actual End Date (for Investigation Conducted)	For an investigation, the Actual End Date corresponds to the date the investigation concluded.
		Actual Start Date (for Investigation Initiated)	Delegated agencies can optionally report the Actual Start Date to identify when the Investigation was initiated (this is required for EPA). If the only the Actual Start Date is reported, the record will be enforcement sensitive.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
Stack Tests	Stack Tests Conducted	Required Data Fields	A stack test, also referred to as a performance or source test, measures the amount of a specific regulated pollutant, pollutants, or surrogates being emitted; demonstrates the capture efficiency of a capture system; or determines the destruction or removal efficiency of a control device used to reduce emissions at facilities subject to CAA requirements. All stack tests conducted for demonstrating or determining compliance with federally-enforceable requirements should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the stack test to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Who Conducted/Who Observed, Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation). Web agencies do this via the Add link. EDT agencies must include this in their submission.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed.
		Conducted By	Conducted By indicates who performed the test or contracted with a third party to perform the test. Since the majority of stack tests reported for compliance purposes are conducted by the owner/operator, the value defaults to owner/operator on the web. Delegated agencies may overwrite this value. EDT agencies must include this in their submission, it will not default.
		Observed By	Observed By indicates whether the delegated agency or EPA was on-site during the test to observe its performance. If an agency was present during the test, delegated agencies should select the agency.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
		Date Achieved	Actual End Date
	Test Results (Pass, Fail, Pending)	Stack Test Status	The status corresponds to whether the measured results indicate the unit was able to meet the emission, parameter or surrogate limit measured; or capture, destruction or removal efficiency required.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
TV ACC Due/Received	All TV ACCs	Required Data Fields	The title V permitting program (Part 70) requires that a compliance certification be submitted not less than annually. All compliance certifications should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the TV ACC to one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type – TV ACC Due/Received (Lead Agency)	Compliance Monitoring Activity Type	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Inspection/Evaluation); for EDT the Compliance Monitoring Activity Type for TV ACC records will be generated based on the XML submission type.
		Compliance Monitoring Type	The compliance monitoring type indicates the specific activity performed. The TV ACC Due/Received indicates the date the compliance certification is due and the date it is received. There are instances where a source is required to submit quarterly or semi-annual certifications. In these instances, all compliance certifications received are to be reported. When multiple compliance certifications are submitted, it is recommended but not required that the delegated agency report the Certification Period in order to show that the full year was covered by the certifications.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Due/Received Date	Planned End Date	The Planned End Date reflects the date the Title V Annual Compliance Certification is due to the permitting authority and/or EPA. Where title V sources submit semi-annual certifications this date should reflect the date each semi-annual certification is due to the permitting authority and/or EPA.
		Actual End Date	The Actual End Date reflects the date the Title V Annual Compliance Certification was received by the permitting authority and/or EPA. Where title V sources submit semi-annual certifications this date should reflect the date each semi-annual certification was received by the permitting authority and/or EPA.
	Air Program(s)	Air Programs	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Compliance Monitoring	The identifier is unique for every record in ICIS. It allows agencies to easily

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
		Identifier	and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
TV ACC Review	All TV ACCs	Required Data Fields	All compliance certifications received should be reviewed, and the review should be reported.
	Action Type – TV ACC Review (Lead Agency)	Reviewer Agency	Part 70 requires that a source submit their compliance certification to both the permitting authority and EPA. Both agencies can report the date and results of a review of a compliance certification on the same Due/Received activity record. Therefore, each agency must identify themselves in order to distinguish between multiple reviews.
	Date Achieved (Review action, Lead Agency)	Reviewed on [Date]	The Reviewed on date corresponds to the date the agency completed their review of the compliance certification.
	Deviations?	Did Facility Report Deviations?	Part 70 requires that a compliance certification identify each deviation. The reviewer agency reports Yes or No to identify whether or not the source reported that deviations occurred during the certification period.
Informal Enforcement Actions	Notification of a Violation	Required Data Fields	An informal enforcement action notifies or advises the recipient of apparent deficiencies, findings concerning noncompliance, or that the issuing agency believes one or more violations occurred at the referenced source and provides instructions for coming into compliance. All informal enforcement actions should be reported.
	Facility ID	ICIS-Air Programmatic ID	Delegated agencies must associate the informal enforcement action to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Enforcement Action Forum	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Judicial Enforcement). Web agencies do this via the Add link. For EDT, the forum for Informal Enforcement Actions will be generated based on the XML submission type.
		Enforcement Action Type	The type of informal enforcement action refers to the method or the vehicle used for notifying a source of a violation. Notification includes any notice of violation required by Section 113 of the CAA or corresponding state, local, or tribal implementation plan as well as other written notices, meetings, teleconferences and electronic correspondence. For HPVs only, the other forms of notice (e.g., teleconference) are to be reported on a Case File, Violation Details as the Method of Advisement and are further referenced below.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Date Achieved	Achieved Date	The Achieved Date reflects the date the notice is issued or provided to the source.
	Air Program Code(s)	Programs Violated	The programs violated are the applicable regulations which a facility was determined to have violated. All air programs violated should be reported on the action record.
	Activity Identifier	Enforcement Action Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Formal Enforcement Actions	Formal Enforcement Actions	Required Data Fields	A formal enforcement action addresses or resolves a violation. Generally these actions are referred to as complaints, settlement agreements, compliance or penalty orders, referrals, consent agreements, or consent decrees. Formal enforcement actions have legal consequences if the source does not comply. All formal enforcement actions should be reported.
	Facility ID	Programmatic ID	Delegated agencies must associate the formal enforcement action to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Enforcement Action Forum	As a result of the structure of ICIS, delegated agencies must first identify the type of activity they wish to report (e.g., Judicial Enforcement). Web agencies will do this via the Add link. For EDT, they must include this in their submission.
		Enforcement Action Type	In order to report a Final Order (e.g., Administrative Compliance Order) users must first create the Enforcement Action Type (e.g., Administrative Order).
		Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
		Milestones: Actual Date	Milestones reference steps in the enforcement response. The milestones vary depending on the type of enforcement (administrative or judicial). When a complaint is filed it is reported as a milestone on an enforcement action. A

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			referral to the State Attorney General or its equivalent is reported as a milestone on a judicial enforcement action. The date that the milestone occurred must be reported.
	Air Program(s)	Programs Violated	The air program is the applicable regulation. All air programs for an activity should be reported on the action record.
	Activity Identifier	Enforcement Action Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Final Order	Formal Enforcement Actions	Required Data Fields	The final order is the vehicle which captures a settlement agreement, compliance schedule, penalty assessment, or conditions to return to compliance.
	Activity Identifier	Final Order ID	Because multiple Final Orders can be reported on the same enforcement action type, a Final Order ID is needed to make the record unique. For web agencies, the Final Order ID will be generated when the record is saved. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
	Facility ID	ICIS-Air Programmatic ID	Delegated agencies must associate the Final Order to at least one facility. The Programmatic ID is the unique identifier for the facility.
	Action Type (Lead Agency)	Final Order Type	The final order is the vehicle which captures a settlement agreement, compliance schedule, penalty assessment, or conditions to return to compliance, which may include injunctive relief.
	Date Achieved	Final Order Issued Date (Admin) Final Order Entered Date (Judicial)	The Final Order Issued Date is the date the final administrative order (e.g., administrative compliance order, administrative penalty order, or consent agreement) was signed by a delegated authority and/or the recipient source. The Final Order Entered Date is the date the final order is entered by a court.
	Resolving Action	Air Resolved Date	For violations addressed administratively or through any non-judicial process, resolved means all penalties have been collected, SEPs completed, and the source is confirmed to be in compliance with respect to violations included in the final order. For violations addressed judicially, resolved means a court of competent jurisdiction has entered an order adjudicating the case and the order is final.

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
	Cash Assessed Penalty	Penalty Assessed to be Paid To:	The Cash Assessed Penalty value is the monetary penalty assessed in the penalty action or settlement offer. A penalty will be required for some enforcement action types, but not all.
Case File	Violation Tracking	Required Data Fields	A Case File must be added for a delegated agency to report a known or suspected violation. A Case File can contain information about more than one violation at a source. Violations should be reported in accordance with the 2014 FRV and 2014 HPV policies. Each of these policies focuses on a subset of federally-enforceable violations.
	Facility ID	Programmatic ID	Delegated agencies must associate the Case File to one facility. The Programmatic ID is the unique identifier for the facility.
	Air Program	Programs	The air program is the applicable regulation that the facility was determined to have violated.
	Pollutant	Pollutants	The pollutant reported is the pollutant that is the basis for the regulation or permit condition that was violated. Multiple pollutants can be reported on a Case File.
	Lead Agency	Lead Agency	The Lead Agency indicates the agency that primarily performed the activity reported. If the reporting agency was not the lead agency for the activity, they must select the Lead Agency. Otherwise, the field will default based on the record type being added (i.e., state, local, etc.).
	Activity Identifier	Case File Identifier	The identifier is unique for every record in ICIS. It allows agencies to easily and accurately identify their records for updating or editing purposes. ICIS-Air will generate the activity identifier automatically when the record is created directly on the web. EDT users must provide the identifier. This was established so that an identifier generated by or recognized by their state or local system could also be used for tracking in ICIS-Air.
Violation Details	Violation Tracking	Required Data Fields	This data is designated as enforcement sensitive.
	Violation	Violation Type	All federally-reportable violations should be reported. The violation type indicates whether the violation is an FRV or HPV.
		Air Program	The air program is the applicable regulation or program that the facility was determined to have violated. Only one air program can be reported per violation type.
		Pollutant	The pollutant reported is the pollutant that is the basis for the regulation or permit condition that was violated. Only one pollutant can be reported per violation type.
	Date Achieved	HPV Day Zero Date	The Day Zero Date is the earliest date that the delegated agency makes the

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			initial identification of a violation as an HPV. It is the date used to evaluate timeliness of actions in accordance with the HPV policy.
	Informal Enforcement	Method of Advisement	The delegated agency should record on the Violation Details that it advised a source of the violation by entering the method of advisement, which includes: any written notices, meetings, teleconferences, and electronic correspondence. If the initial notice is a Notice of Violation or Warning Letter issued pursuant to CAA § 113(a) or a State or Tribal implementation plan, the notice is to be reported using the Enforcement Action module.
	Date Achieved	Date of Advisement	This corresponds to the date when the facility was initially advised of any violation.
HPV	HPV Pathway	Required Data Fields	These actions are either linked to a Case File or reported on the Case File. When a compliance monitoring activity is linked to or reported on a Case File, it is the discovery action. When a formal enforcement action is linked to a Case File it is the addressing and resolving action.
	Discovery Action	Discovery Action/Date	The activity that led to the discovery of a violation. The Discovery Action can either be a compliance monitoring activity reported to ICIS as such and linked to a Case File, or other options for discovery action can be reported (e.g., self-disclosed). The other options are reported on a Case File.
	Addressing Action	Addressing Action/Date	The delegated agency can address a violation using one of the following legally-enforceable actions: (1) issuing a legally enforceable order, (2) issuing a legally enforceable order that imposes penalties, (3) issuing a legally enforceable order that imposes a schedule on the source to comply with the requirement(s) violated and penalties, or (4) transferring the matter to an organization with authority to initiate a civil or criminal judicial action. The addressing action can either be an enforcement action reported to ICIS as such and linked to a Case File, or there are non-enforcement options reported on the Case File as an addressing action (e.g., No Further Action, Lead Change).
	Resolving Action	Resolving Action/Date	Resolved means that: (a) in a filed judicial action (state, local or federal), a court of competent jurisdiction has entered an order adjudicating the case; (b) for violations addressed administratively or through any non-judicial means, all penalties have been collected, all SEPs completed, and the source is confirmed to be in compliance with respect to all HPVs included in the administrative order or non-judicial agreement; or (c) an enforcement agency has proposed revisions to its implementation plan regarding the violation. If the resolution was achieved via enforcement, then the date the violation was

Area	MDR	ICIS-Air Data Field	Further explanation of specific data fields.
			resolved is reported on the enforcement action. If resolution was achieved through non-enforcement means, the resolving action is reported on the Case File (e.g., Proposed SIP Revision).

TABLE 2
SUMMARY OF NATIONAL MINIMUM DATA REQUIREMENTS (MDRs)
FOR CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE-2012 ICR

Note: Unless otherwise noted, both the EPA Regions and delegated agencies report their own data. The universe of facilities for ICIS-Air includes: Major, Synthetic Minor and Part 61 NESHAP Minor facilities, other facilities identified within the CMS Evaluation Plan, any facility with a formal enforcement action, and any facility with an active HPV. Facilities with formal enforcement actions (i.e., administrative orders, consent decrees, civil or criminal referrals and actions) should be tracked until the resolution of the violation, regardless of classification. If a minor source is included in the CMS universe, has a current enforcement action of three (3) years old, or is listed as a discretionary HPV, it is considered reportable. Individual regional/state agreements are not superseded by this listing.

<u>Identification</u>	<u>AFS Acronym</u>
1. Facility Name	PNME
2. State	STAB/STTE
3. County	CNTY
4. Facility Number	PCDS
5. Street	STRS
6. City	CYNM
7. Zip Code	ZIPC
8. NAICS Code	NIC1
[Note: While SIC Codes can be reported to AFS, reporting of the NAICS code is required.]	
9. Government Ownership	GOVT
10. HPV Linkage and Key Action (Day Zero)	Linked from Action Data
<u>Compliance Monitoring Strategy (CMS)</u>	
11. CMS Source Category	CMSC
12. CMS Minimum Frequency Indicator	CMSI
Note: Generally EPA enters these fields into AFS; delegated agencies provide this information per agreement with the EPA Region. An EPA Region may delegate data entry rights to a delegated agency.	
<u>All Regulated Air Program(s)</u> [Note: All applicable air programs should be reflected at the plant level of AFS.]	
13. Air Program	APC1
14. Operating Status	AST1
15. Subparts for NSPS, NESHAP and MACT	SPT1
Note: Any applicable subpart for the NSPS, NESHAP or MACT air program at major and synthetic minor sources, minor source NESHAP and all other facilities reported as MDR. Reporting of minor source NSPS and MACT subparts are optional, but recommended.	
<u>Regulated Pollutant(s) within Air Programs(s)</u>	

16. Pollutant(s) by Code or Chemical Abstract Service Number	PLAP/CAPP
17. Classification(s): EPA/ST	ECLP/SCLP
18. Attainment Status: EPA/ST	EATN/SATN
[Note: The 2011 ICR restricts the values necessary for the Attainment Status to N = Nonattainment, A = Attainment, and U = Unknown]	
19. Compliance Status: EPA/ST	ECAP/SCAP
Actions Within Air Programs (includes Action Number, Type, Date Achieved)	
20. Minimum Reportable Actions:	
<ul style="list-style-type: none"> • Informal Enforcement Action: Notice of Violation(s) • Formal Enforcement Actions: Administrative Order(s) and Assessed Penalties, Consent Decrees and Agreements, Civil and Criminal Referrals, Civil and Criminal Actions • HPV Violation Discovered: Linked actions are FCEs, PCEs, Stack Tests (Observed or Reviewed), Title V Annual Compliance Certifications, Stack Test Notification Receipt • HPV Addressing Actions: Linked actions include but are not limited to State/EPA Civil or Criminal Referrals, State/EPA Civil or Criminal Actions, Administrative Orders, Consent Decrees, Source Returned to Compliance by State/EPA with no Further Action Required. • HPV Resolving Actions: Linked actions include but are not limited to Violation Resolved, Closeout Memo Issued, Source Returned to Compliance by State/EPA with no Further Action Required. • Full Compliance Evaluations (On or Off Site) • Stack Tests: Date of the test is reported in the Date Achieved field, Pass/Fail/Pending codes (PP/FF/99) are reported in the results code field, must be reported to AFS within 120 days. • Title V Annual Compliance Certification Due/Received: Reported by EPA unless otherwise negotiated. The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the “Title V Annual Compliance Certification Due/Received by EPA” action, and is not enforcement sensitive. • Title V Annual Compliance Certification Reviewed: Includes Results Codes for Annual Compliance Certification reviews: in compliance (MC), in violation (MV), and unknown (MU). Annual Compliance Certification deviation(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated). • Investigations: EPA Investigation Initiated (started) and State/EPA Investigation Conducted (finished). State Investigation Initiated is added for optional use. EPA and State Investigation Initiated (started) action types are enforcement sensitive. 	
Additional Action Information:	
21. Results Code	RSC1
Note: Pass/Fail/Pending (PP/FF/99) codes are reported for Stack Test actions. Compliance Results Codes of “In Compliance (MC), In Violation (MV), or Unknown (MU)” are entered for Title V Annual Compliance Certification reviews.	
22. RD08 (Certification Deviations)	RD81

Note: EPA reports into AFS unless otherwise negotiated. Compliance Codes of “In Compliance (MC), In Violation (MV), or Unknown (MU)” are entered for Title V Annual Compliance Certification reviews.	
23. Date Scheduled	DTS1
Note: The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the “Title V Annual Compliance Certification Due/Received by EPA” action, and is not enforcement sensitive.	
24. HPV Violation Type Code(s)	VTP1
Note: To be identified when the Day Zero action is established	
25. HPV Violating Pollutant(s)	
Note: To be identified when the Day Zero action is established.	
<u>Timeliness Standard</u>	
26. Action Reported within 60 Days of Event reported in the Date Achieved (DTA1) field of the action record for delegated agencies, with a minimum upload of six (6) times per year. Monthly updating is encouraged. Federal Data is to be reported on a monthly basis.	
<u>OPTIONAL/DISCRETIONARY DATA REPORTING: NON-MDR DATA</u>	
The following items cover data that are not considered MDRs, but as useful and helpful for program implementation, evaluation, and oversight. Delegated agencies are encouraged to report the following items whenever practicable.	
<ul style="list-style-type: none"> Minor Facility information: For minor sources that are not MDR (MDR for minor facilities is defined as: Minor NESHAP, a minor facility identified within the CMS plan for evaluation, minor facilities with an enforcement action less than three (3) years old, or any HPV case regardless of class) reporting is optional but encouraged. Minor source information would include NSPS and MACT subpart applicability. 	
<ul style="list-style-type: none"> Stack Test Pollutant (PLC1) 	
<ul style="list-style-type: none"> Partial Compliance Evaluations (PCEs) and specific reporting of On-Site PCE activity defined as: Complaint Partial Compliance Evaluation, Permit Partial Compliance Evaluation, Process Partial Compliance Evaluation, and Partial Compliance Evaluation On-Site Observation. (Note: All PCEs are required to be reported by EPA Regional offices. Also, any negotiated PCEs that are part of an alternative frequency which is part of an agency’s CMS plan are required to be reported.) 	
<ul style="list-style-type: none"> Reporting more frequently than every 60 days. 	
<ul style="list-style-type: none"> State Investigations initiated (Enforcement Sensitive). 	
<ul style="list-style-type: none"> Title V Permit Program Data Elements (PPDEs): Required for reporting to AFS by the 	

Office of Air Quality Planning and Standards (OAQPS), used by the Office of Enforcement and Compliance Assurance (OECA) for major source universe population. To be established when the title V permit is issued. AFS will require the establishment of an AFS ID, the individual permit number, category, and event type for permit issued plus the date achieved. Permit Program Data Elements (PPDEs) include the Permit Number (ASPN), Permit Category (PMTC), and Permit Issuance Event Types (IF – Permit Issued and IR – Permit Renewal) and the date (PATY/PDEA).

- Automatic Generation of the Compliance Status for High Priority Violator (HPV) Pathways: Agencies have the option of using AFS software to generate the compliance status for sources with HPV pathways.

5. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

(a) AGENCY ACTIVITIES

Activities performed by EPA personnel involve both EPA regional and headquarters staff. The regional offices generally serve as the primary liaison with respondents, and, if applicable, assume the primary role of any EPA reporting of data. Headquarters staff focus primarily on data system issues, data management practices, and other national program management activities. The EPA activities include²:

- Interaction with delegated agencies (e.g., answer respondent questions, train respondents on the use of the system, liaison with delegated agencies, participate in national data management discussions)
- Facilitate access to the database
- Audit and review of data submissions
- Data entry and verification
- Report preparation
- Program review (including review of user needs and suggestions of software revisions, or identification for delegated agencies of best/efficient data management and quality assurance practices)
- Data interpretation and analysis (including targeting activities)
- Quality assurance guidance

(b) COLLECTION METHODOLOGY AND MANAGEMENT

(i) Overview

² For purposes of estimating burdens, the first five items are considered the primary Regional Office activities and the last three items are considered the primary Headquarters activities.

Management of the compliance and enforcement information collected from delegated agency respondents for entry into a national data system is a well-established process. Reporting source information, violation determinations, and compliance and enforcement activity data to ICIS-Air and its predecessors, AFS and the Compliance Data System (CDS), has existed for the past 33 years. The MDRs have been developed as essential components of a compliance and enforcement tracking program and have been adopted into delegated agency data systems. Many delegated agencies will electronically update ICIS-Air from their database, while the remaining agencies will enter data into ICIS-Air directly. In some instances, EPA Regional Offices will enter compliance and enforcement data on behalf of EPA as well as for a specific delegated agency.

The EPA data collection guidance and technical support for respondents during the past 33 years has focused on supporting agencies in their collection methodology to minimize the total burden associated with meeting their reporting requirements. The Agency will continue to focus on these efforts.

The Agency also has developed documents and memoranda to explain the collection and reporting of MDRs, such as user manuals and a business rule compendium. New reporting, training, and user guidance documents have been developed for ICIS-Air. In addition to continuing to improve these documents, EPA will continue to provide services in support of optimizing the collection and reporting of MDRs, including the following:

- An ICIS-Air telephone help line providing users with data collection transmittal and quality assurance, supplemented by contractual, Regional and Headquarters staff.
- User training, both to ensure a smooth transition to ICIS-Air and to support the training of future ICIS-Air users on an ongoing basis.
- Support for development and use of plug-in technologies that greatly simplify the electronic transfer of data from delegated agency databases to ICIS-Air.
- Periodic webinars to disseminate news and information to all registered users.

The EPA presents these tools in plain English to provide novice and experienced personnel with suggestions as to how their reporting burden can be minimized. More specific guidance is provided as each EPA Regional Office enters into specific agreements with delegated agencies on CAA stationary source compliance and enforcement information reporting.

(ii) Data Quality Checking Procedures

ICIS-Air data that are directly entered via the web interface are edited and validated by the system upon submission for range, context, and appropriate database record identification and cross referencing. Analogous data quality checks are made within the EPA Central Data

Exchange (CDX) when delegated agencies transfer data electronically to ICIS-Air. On a weekly basis, the EPA downloads data from ICIS-Air and loads it into multiple applications providing data to the public: the ECHO system and ENVIROFACTS. These systems maintain procedures for error resolution and correction; thereby, improving the quality of data in ICIS-Air.

Many delegated agencies have written Standard Operating Procedures or have expanded Quality Assurance Project Plans that define their reporting process. These procedures contain a data correction mechanism, define data ownership, and outline each step taken to report timely, accurate, and useable data to the EPA. Additionally, the OECA Office of Compliance has a Quality Management Plan requiring that data quality requirements be built into each information system managed by the Office.

The EPA reviews a comprehensive set of data retrievals on a cyclic basis to review delegated agency progress within the CMS, review implementation of CAA FRV and HPV policies, examine milestone completion with HPV pathways, and enable overall review of data elements for accuracy.

The OECA State Review Framework (SRF) utilizes MDR data to document activity for air compliance and enforcement oversight on a periodic basis. Delegated agencies have an opportunity during their reviews to validate the data, make corrections as appropriate, or develop processes to address identified program concerns.

(iii) Machine and Processing Technology

ICIS-Air resides on EPA's Enterprise Servers at the National Computer Center (NCC) in North Carolina and is accessible to all delegated agency users via the internet.

(iv) Data Entry and Storage

Once compliance data are submitted to EPA, either directly online or via an electronic data transfer process by delegated agency data stewards, the data are managed and maintained by EPA. If either EPA staff or a delegated agency data steward identifies any concerns with the data or the system, EPA staff and the data steward discuss and resolve the concern. EPA policy specifies the security and retention requirements for its databases, in addition to the specific program requirements and archiving protocols associated with each compliance data collection program. Users of ICIS-Air should maintain reportable MDR data in the system for at least five (5) years with the exception of data pertaining to HPVs. Sources with HPVs are to be kept in ICIS-Air regardless of operating status.

(v) Public Access

The public may access CAA stationary source compliance and enforcement information through:

- Review of ICIS-Air data available through EPA-supported Web sites such as ECHO (echo.epa.gov) and ENVIROFACTS (http://www.epa.gov/enviro/)
- Freedom of Information Act requests made to EPA

(c) SMALL ENTITY FLEXIBILITY

The respondents for this information collection activity are state, local, tribal, and territorial delegated agencies. The Regulatory Flexibility Act (RFA), incorporated in the 1995 Paperwork Reduction Act, defines a “small governmental jurisdiction as governments of cities, counties, towns, townships, villages, school districts, or special districts with a population of less than 50,000.” The delegated agencies covered by this renewal ICR are above that threshold, and therefore no small entities will be affected by this information collection. The respondents defined as local agencies are recipients of Clean Air Act Section 105 grants, or have assumed reporting responsibility from their respective state agency.

(d) COLLECTION SCHEDULE

Since the 2012 ICR, data from delegated agencies is collected on a 60-day schedule (except for stack test dates and results), associated with the Federal fiscal calendar. EPA Regional and HQ data is to be reported to ICIS-Air on a monthly basis. Data is extracted weekly and provided to EPA systems for use in analysis and to provide data to the public. On a routine basis Regional and Headquarters EPA program staff develop trend and status reports utilizing ICIS-Air data and assess the completeness of the data submitted.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Please note that the EPA is providing a limited burden assessment in this ICR renewal. The EPA will develop a more robust burden assessment for the next ICR renewal. The assessment in this ICR is limited because delegated agencies have just begun using ICIS-Air and, at the time of this ICR renewal, not all agencies that will be reporting electronically are currently doing so. In addition, the EPA completed key revisions to the HPV and FRV policies that EPA expects will result in burden reductions.

For this ICR renewal, the burden estimate is based on the expected relative change in burden associated with reporting to ICIS-Air versus to AFS. EPA completed a time study to compare the amount of time required to enter data in AFS to ICIS-Air. EPA also interviewed agencies that have submitted data electronically to ICIS to compare the batch upload process they used for AFS to the EDT process they use for ICIS-Air. EPA also interviewed agencies to measure the one-time burden imposed by the transition from AFS to ICIS-Air.

(a) ESTIMATING RESPONDENT BURDEN

Comparing AFS and ICIS-Air Direct Data Entry Burden

To estimate the relative change in burden associated with directly entering required data to ICIS-Air versus to AFS, EPA conducted a time study comparing forty-seven (47) different AFS direct data entry scenarios to the equivalent ICIS-Air direct entry scenarios (Appendix 2). The study, conducted in October 2014, included 28 different business processes within the databases.

The time study was conducted by a contractor who has supported AFS for several decades and therefore knows the most efficient means to enter data into AFS. The contractor staff gained familiarity with ICIS-Air as they were involved in the ICIS-Air development effort as a sub-contractor and participated in training on ICIS-Air. Overall, given their deep AFS expertise and their modest degree of expertise in using ICIS-Air, the study likely has a bias toward underestimating the relative burden experienced by AFS users.

The results provide a strong indication that ICIS-Air direct entry users will experience a discernable reduction in overall burden. In summary, the study found that:

- 12 of the AFS data entry scenarios (including establishing connectivity through Host on Demand, changing compliance status, archiving/de-archiving facilities, looking up table values, updating plant ids) no longer needed to be performed at all within ICIS-Air.
- 22 ICIS-Air direct data entry scenarios took less time than the equivalent AFS process.
- 6 direct data entry processes took the same amount of time in AFS and ICIS-Air.
- 7 AFS direct data entry scenarios took less time than the equivalent process in ICIS-Air.

EPA is currently preparing several enhancements to ICIS-Air application software that will improve the efficiency of Case File/HPV data entry. These enhancements to ICIS-Air will address several of the 7 direct data entry processes in which AFS entry was more efficient during the time study. The time study demonstrates that replacing AFS with ICIS-Air will result in reduced burden to delegated agencies entering data directly to ICIS-Air. Therefore, we expect the actual burden estimate for ICIS-Air to be less than previous burden estimates calculated for AFS.

Comparing AFS and ICIS-Air Electronic Data Transfer (EDT) Burden

Calculating burden associated with ICIS-Air electronic data transfer is very difficult at this time, since less than ten agencies have successfully transferred data to ICIS-Air since it was put into production on October 27, 2014. EPA recognizes that a comprehensive assessment of EDT burden cannot be performed at this time, as over thirty agencies have not yet successfully transferred data. EPA expects that approximately forty agencies will be able to successfully transfer to ICIS-Air by mid-2015.

EPA requested initial feedback from the small number of agencies that have successfully

transferred data to ICIS-Air via EDT. These agencies were asked to estimate their burden for transferring data to ICIS-Air, given their initial experiences doing so, and compare it with their estimated previous year burden for submitting required data to AFS. EPA received responses from six agencies. The results, as referenced below, were inconclusive:

- One agency stated that they believed the burden would be about the same annually. (Approximately 312 hours per year)
- Two agencies both estimated that reporting to ICIS-Air would take twice as long as reporting to AFS (50 hours/year for ICIS-Air to 25 for AFS; and, 48 ICIS-Air to 24 AFS)
- Two agencies estimated that their reporting burden would drop by up to 2/3 (30-36 hours for AFS to 10-15 hours for ICIS-Air) and precipitously to near zero (12-36 hours for AFS to minutes for ICIS-Air) since the process was fully automated from that agency system to ICIS-Air.
- And, one agency estimated that their reporting burden will go up (from 48 hours to AFS to 60 hours for ICIS-Air)

EPA recognizes the importance of limiting reporting burden for delegated agencies. ICIS-Air was designed with that goal in mind. Our experience with the CWA/NPDES program, which made a similar transition from an aging mainframe database to ICIS-NPDES several years ago, indicates that the burden associated with reporting via EDT was reduced dramatically for many state agencies. EPA will continue to work with delegated agencies that will report to ICIS-Air via EDT to help them streamline and automate their reporting processes and achieve the dramatic reductions in burden experienced by two of the aforementioned agencies.

Estimating One Time Burden Associate with the Transition from AFS and ICIS-Air

EPA is appreciative of the sustained and extensive time commitments made by delegated agencies to transition from AFS to ICIS-Air. To understand the extent of the one-time transition burden associated with this system modernization effort, EPA solicited and received responses from eight delegated agencies regarding their estimated burden to participate in ICIS-Air workgroup activities, perform ICIS-Air testing, prepare their AFS data to successfully migrate to ICIS-Air, and prepare to flow data from their data base to ICIS-Air (if applicable).

Based upon the estimates EPA received from the eight state/local agencies, the average one-time burden for transition from AFS to ICIS-Air was 124 hours for direct entry agencies (based on 3 responses) and 1103 hours for agencies reporting to ICIS-Air via EDT (based on 5 responses). There are approximately 64 agencies that report to ICIS-Air directly and 35 agencies that plan to report via EDT. Using those figures as multipliers, EPA estimates that approximately 46,500 hours of one-time burden was experienced by employees of the 99 agencies that transitioned their reporting of CAA stationary source compliance and enforcement data from AFS to ICIS-Air.

- The basis of the reportable universe is 13,742 major sources, 25,466 synthetic minor sources

(sources with the potential to emit at the major threshold, but emit under this threshold due to process or operating restrictions), and 3,176 minor or other sources.

- The average respondent hours for reporting activities will depend on the number of sources for which a delegated agency must collect and report source information, and compliance and enforcement data.

(b) ESTIMATING RESPONDENT COSTS

Because this burden estimate is limited in that it reflects very little user experience with the production ICIS-Air system, the EPA is providing the quantified estimates used for previous ICR renewals. The Agency did adjust the hours spent based on the redistribution of the size of agencies.

(i) Estimating Labor Costs

The last column in Worksheet 1 reports the total costs of respondent burden activities. The costs reflect the use of appropriately skilled labor at \$47.89 per hour. This hourly rate is in 2010 dollars reflecting average delegated agency government wages and salaries taken from the Bureau of Labor Statistics, US Department of Labor web site at <http://stats.bls.gov/NEWS.RELEASE/ECEC.T04.HTM>. This average wage incorporates 95% of Management, Professional, and Related rates and 5% Office and Administrative Support rates from the Occupational Group of Delegated agency Government Employer costs per hour, to reflect the mix of skills required for data oversight. The 2008 ICR used a rate of \$45.90 per hour. The burden cost by activity is computed as the product of burden hours and cost per hour. Added to cost are appropriate travel costs to meetings and workshops. The total annual burden cost for delegated agencies is estimated to be approximately \$2.8 million. The burden per response is approximately 92 hours.

(ii) Estimating Capital and Operations and Maintenance Costs

There are no capital and maintenance costs associated with this reporting activity. Delegated agencies maintain computers for their own tracking needs and this reporting activity only involves reformatting and transmission of that data.

(c) ESTIMATING AGENCY BURDEN AND COST

Section 5(a) identifies several Agency activities for this information collection. Worksheet 2 presents the Federal EPA burden and cost estimates for each of these activity categories. Hours are allocated for data base management on the basis of 1.5 full-time equivalent positions dedicated to ICIS-Air activities in each Regional Office and 2 full time equivalents at the Headquarters level. The estimates are based on information from Regional Offices and on prior experience with the program. Estimates are formulated on a monthly basis versus bi-

monthly basis (every 60 days) required of delegated agencies. Cost estimates for Regional activities are based on the salary of a GS-12 (step 5) staffer in 2010. An overhead factor of 1.6 is applied, and an average locality adjustment pay is available via the Salary Table on the Office of Personnel Management's web site to determine a full loaded hour rate for Regional activities or \$2,036,369 annually across the nation (<http://www.opm.gov/oca/10tables/indexGS.asp>). The cost also includes travel expenses for Regional employees to attend data meetings and workshops.

The bottom half of Worksheet 2 shows the burden and costs for EPA Headquarters staff. Direct labor costs are based on a GS-14 (Step 5) System Administrator, and a GS-13 (Step 5) Security Manager. The fully loaded staffing cost, with Washington DC locality pay, using the 1.6 benefit factor, is \$355,037. The cost also includes travel expenses for Regional employees to attend data meetings and workshops.

WORKSHEET 1
ANNUAL DELEGATED AGENCY RESPONDENT BURDEN
ESTIMATES (2010; EPA-HQ-OECA-2010-0777; EPA ICR No. 0107.10, OMB
Control No. 2096-0096.) Updated in 2014 to reflect a slight shift from the previous
ICR in the distribution of agencies based on size.

Respondent Activities: Process, compile and review information; transmit information to AFS. Maintain records for AFS reporting compatibility.	Number of Enforcement Agencies	Annual Responses (6x per year)	Annual Hours per Respondent	Total Hours	Total Cost
Small Delegated agencies (less than or equal to 59 major sources)	54	324	1,685.00	10,110.00	\$527,339.55
Medium Delegated agencies (60-349 major sources)	33	198	2,312.75	13,876.52	\$689,240.78
Large Delegated agencies (greater than or equal to 350 major sources)	12	72	4,571.00	27,425.98	\$1,472,320.36
Totals	99	594	8,568.75	51,412.50	\$2,688,900.69

Total Cost is taken from Department of Labor statistics found at: <http://stats.bls.gov/NEWS.RELEASE/ECEC.T04.HTM>
Costs include median dollar amounts for travel costs to data management meetings and workshops.

WORKSHEET 2
FEDERAL ANNUAL AGENCY BURDEN
ESTIMATES (2010; EPA-HQ-OECA-2010-0777; EPA ICR
No. 0107.10, OMB Control No. 2096-0096.)

EPA REGION	# OF RESPONSES	HOURS PER RESPONSE	TOTAL HOURS	HOURLY COST	FULLY LOADED COST	TOTAL COST	
REGION 1	12	260.00	3,120.00	\$40.85	\$65.36	\$205,923.20	Boston, MA
REGION 2	12	260.00	3,120.00	\$42.13	\$67.41	\$212,312.96	New York, NY
REGION 3	12	260.00	3,120.00	\$39.86	\$63.78	\$200,981.12	Philadelphia, PA
REGION 4	12	260.00	3,120.00	\$39.05	\$62.48	\$196,937.60	Atlanta, GA
REGION 5	12	260.00	3,120.00	\$40.95	\$65.52	\$206,422.40	Chicago, IL
REGION 6	12	260.00	3,120.00	\$39.50	\$63.20	\$199,184.00	Dallas, TX
REGION 7	12	260.00	3,120.00	\$37.37	\$59.79	\$188,551.04	Kansas City, MO
REGION 8	12	260.00	3,120.00	\$40.10	\$64.16	\$202,179.20	Denver, CO
REGION 9	12	260.00	3,120.00	\$44.24	\$70.78	\$222,846.08	San Francisco, CA
REGION 10	12	260.00	3,120.00	\$39.87	\$63.79	\$201,031.04	Seattle, WA
Totals	120	2,600.00	31,200.00			\$2,036,368.64	

EPA HEADQUARTERS SYSTEM	# OF RESPONSES	HOURS PER RESPONSE	TOTAL HOURS	HOURLY COST	FULLY LOADED COST	TOTAL COST	
ADMINISTRATOR	12	173.33	2,080.00	\$57.13	\$91.41	\$192,128.64	GS-14/5
SECURITY MANAGER	12	173.33	2,080.00	\$48.35	\$77.36	\$162,908.80	GS-13/5
Totals	24	346.67	4,160.00			\$355,037.44	
Total Federal Burden	144	2,946.67	35,360.00			\$2,391,406.08	

Federal Wage Scales found at: <http://www.opm.gov/oca/10tables/indexGS.asp>

Fully loaded wage is hourly wage multiplied by 1.6. Total cost includes travel costs for meetings and workshops.

(d) ESTIMATING RESPONDENT UNIVERSE AND TOTAL BURDEN

See Worksheet 1 (above).

(e) BOTTOM LINE BURDEN HOURS AND COSTS

Worksheet 3 summarizes the total annual burden hours and costs for AFS collection activity. The data for Worksheet 3 represents totals computed across activities identified in Worksheets 1 and 2.

Respondent Type	Total Hours	Total Costs
1. Delegated agencies	51,412	\$ 2,688,900
2. EPA Regions	31,200	\$ 2,036,369
3. EPA Headquarters	4,160	\$ 355,037
Totals	86,772	\$ 5,080,306

(f) REASONS FOR CHANGE IN BURDEN

Under the previous renewal ICR (2010; EPA ICR No. 0107.10, OMB Control No. 2060-0096.), total annual delegated agency respondent burden decreased to 54,384 hours. In this renewal, the total estimated annual decrease in respondent burden is 2,971 hours. The decrease occurred as a result of slight shifts in the distribution of agencies by size (see Worksheet 1), due to a continued reduction in the universe of major air sources.

(g) BURDEN STATEMENT

The average burden per response for this collection of information is estimated to be 92 hours, though this estimate varies according to the type of respondent. Reporting by delegated agencies on source compliance and enforcement actions is estimated based on the number of major sources. It is estimated that agencies will collectively spend a total of 51,412 hours per year for the transmittal, management and quality assurance of their data. The EPA will require a total of 35,360 hours per year for EPA oversight, data quality assurance, reporting, and other Agency activities, for an overall total of 86,772 hours for both Federal and delegated agency effort. These estimates are completely extrapolated based on data submitted under the previous ICR renewal.

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; 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 regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OECA-2014-0523, which is available for online viewing at www.regulations.gov, or in person viewing at the OECA Docket in the EPA Docket Center (EPA/DC), William Jefferson Clinton West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202)566-1744, and the telephone number for OECA Docket is (202)566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. 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-OECA-2014-0523 and OMB Control Number 2060-0096 in any correspondence.

APPENDIX 1
DELEGATE AGENCY CLASSIFICATION BY SIZE
99 AGENCIES

AGENCY	MAJORS	Synthetic Minor	Minors	AGENCY	MAJORS	Synthetic Minors	Minors
SMALL AGENCIES < 59 MAJORS							
AMERICAN SAMOA	0	0	0	CA-MONTEREY BAY	19	1	0
NV-WASHOE	2	4	0	OR-LANE	18	16	0
WA-BENTON	2	4	0	AL-HUNTSVILLE	6	12	1
MARIANNAS PROTECTORATE	4	2	0	WA-NORTHWEST	22	10	0
WA-YAKIMA	4	1	0	VI	10	3	0
CA-FEATHER RIVER	5	0	3	VT	14	84	1
CA-KERN	6	1	0	CA-SAN DIEGO	27	8	0
CA-SAN LUIS OBISPO	6	11	0	CA-VENTURA	24	7	0
IA-POLK	18	420	5	NV-CLARK	27	6	0
NM-ALBUQUERQUE	9	15	2	NC-ASHEVILLE	31	73	0
WA-SPOKANE	9	19	0	NV	29	35	0
NC-FORSYTH	10	22	5	WA-PUGET SOUND	32	75	33
CA-IMPERIAL	11	7	0	DC	40	0	16
IA-LINN	17	124	3	PA-ALLEGHENY	30	37	24
NC-MECKLENBURG	9	76	5	TN-MEMPHIS	30	105	1
AZ-PINAL	16	3	0	KY-JEFFERSON	35	100	0
CA-YOLO SOLANO	14	0	0	AL-JEFFERSON	35	101	2
AZ-PIMA	15	4	0	AZ-MARICOPA	33	46	17
CA-SACRAMENTO	15	6	0	PA-PHILADELPHIA	32	75	19
TN – KNOX	8	40	5	TN – NASHVILLE	11	94	1

WA – OLYMPIC	12	9	1	WA – SOUTHWEST	14	20	1
NE – LINCOLN	16	30	1	GU	18	3	1
WA	28	19	1	NH	35	119	72
RI	37	87	6	PR	40	14	10
CA – MOJAVE DESERT	51	1	0	ID	45	200	22
ME	57	168	6	AZ	58	72	12
CA – CARB	48	21	2	NE – OMAHA	15	35	1
MEDIUM = 60 – 349 MAJORS							
MT	66	170	14	ND	76	102	8
CA – SANTA BARBARA	75	53	0	CT	72	194	25
SD	89	66	1	CA – BAY AREA	84	30	2
NE	98	96	18	UT	99	212	53
MD	120	211	15	HI	133	6	2
OR	110	21	0	MA	140	924	150
AK	144	213	10	DE	60	80	3
WY	125	30	90	NM	145	407	73
WV	163	62	30	AR	196	623	65
CA – SAN JOAQUIN	303	180	1	VA	254	1588	9
IA	249	1473	5	CO	236	1266	290
MS	276	278	17	KY	278	356	3
KS	307	759	55	MN	287	230	58
OK	291	2141	6	TN	230	405	108
MO	268	232	57	NJ	279	1024	56
SC	271	402	11	NC	332	763	16
AL	315	253	12				
LARGE => 350 MAJORS SOURCES							

FL	372	562	13	GA	376	1270	23
NY	423	2954	104	MI	390	853	7
CA – SOUTH COAST	441	0	32	WI	419	248	8
IL	480	225	251	LA	517	82	568
PA	523	721	217	IN	600	550	23
OH	605	847	57	TX	1310	0	207

APPENDIX 2: Business Processes for Reporting Stationary Source information into Data System of Record

NOTE: The ICIS-air processes listed in this document, have been described in just one way. Users may navigate through ICIS-air and enter or change records via alternative routes

Process #	Process	Relative Degree of Use	Explanation	Steps needed to Achieve Process in AFS	Amount of time taken to perform process in AFS	Steps needed to Achieve Process in ICIS-Air	Amount of time taken to perform process in ICIS-air
1	Download and install Host on Demand (HOD)	Infrequent	This software necessary to communicate with the mainframe	Go to https://trex.rtpnc.epa.gov and follow download and installation.	2-10 minutes depending on connection speed	Not needed for ICIS-air	N/A
2	Download and install Host on Demand (HOD)	Infrequent	Periodic upgrades to HOD	Go to https://trex.rtpnc.epa.gov and follow instructions to remove previous version and then install new version.	2-10 minutes depending on connection speed	Not needed for ICIS-air	N/A
	Execute Host On Demand (HOD)	Frequent	Necessary to communicate with the AFS	Execute Host on Demand	15 seconds - 2 minutes depending on connection speed	Not needed for ICIS-air	N/A
3	Logon to application	Frequent use	Used each time a user logs onto AFS	Access the mainframe using HOD. Enter AIRS on the Command line and the User ID and password on mainframe screen	15 seconds - 2 minutes depending on connection speed	Go to //https://icisairtest.epa.gov/icis and logon using WAM User ID and password	1 minute

4	Add a facility	Moderate use	Used when a federally reportable facility is added	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Enter information for Plant General fields (Plant Name, Street Address, City Name, Zip Code, NAICS & Governmental Facility Code); Air Program fields (Air program code and Air Program Status) & Air Program Pollutant fields (Air Program, Pollutant Code, State Compliance Status, State Classification and State Attainment Indicator). Press ENTER to SAVE</p>	8 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then ADD A FACILITY; provide Programmatic ID, Facility Site Name, State, Zip Code, Address, City, County Name & Primary NAICS. Select SAVE AND ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.</p>	3 minutes
				<p>If already logged into AFS, go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Enter information for Plant General fields (Plant Name, Street Address, City Name, Zip Code, NAICS & Governmental Facility Code); Air Program fields (Air program code and Air Program Status) & Air Program Pollutant fields (Air Program, Pollutant Code, State Compliance Status, State Classification and State Attainment Indicator). Press ENTER to SAVE</p>	5 minutes	<p>If already logged into ICIS-air, select AIR then ADD A FACILITY; provide Programmatic ID, Facility Site Name, State, Zip Code, Address, City, County Name & Primary NAICS. Select SAVE AND ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.</p>	2 minutes
5	Add Regulated Air Program	Infrequent	Used whenever a Regulated AIR Program is added to an existing facility	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Enter information for Air Program fields (Air program code and Air Program Status) & Air Program Pollutant fields (Air Program, Pollutant Code, State Compliance Status, State Classification and State Attainment Indicator). Press ENTER to SAVE</p>	4minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE.</p>	2 minutes

				<p>If already logged into AFS, go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Enter information for Air Program fields (Air program code and Air Program Status) & Air Program Pollutant fields (Air Program, Pollutant Code, State Compliance Status, State Classification and State Attainment Indicator). Press ENTER to SAVE</p>	2 minutes	<p>If already logged into ICIS-air, select AIR then Search for Facility. Select facility from Search list. Select ADD AIR PROGRAM; Provide Air Program, Operating Status and any applicable subparts. Select SAVE.</p>	1minute
6	Add a regulated Pollutant	Infrequent	Used whenever a new pollutant is added to an air program on an existing facility	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Enter information for Air Program Pollutant fields (Air Program, Pollutant, State Compliance Status, State Classification & State Attainment Indicator). Press ENTER to SAVE</p>	4minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.</p>	3 minutes
				<p>If already logged into AFS, goto AIRS Main Menu and select Update AFS Online. Update Plant Air Program Pollutant fields (Air Program, Pollutant, State Compliance Status, State Classification & State Attainment Indicator). Press ENTER to SAVE</p>	2 minutes	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select ADD POLLUTANT. Provide Pollutant and Classification. Select SAVE.</p>	1.5 minutes

7	Add a Compliance Monitoring action	Frequent use	Used to add PCE's, FCE's, Stack Tests, TVACC & Investigations to an existing facility	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Supply information for Plant Action (Action Number, Action Air Program(s), Action Type, Date Achieved, and possibly Results code, RDE8 and Pollutant Code). Press ENTER to SAVE.</p>	5 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select Compliance Monitoring-Inspection/Evaluation for State. Supply information for Compliance Monitoring Identifier, Compliance Monitoring Type, Linked facilities, Actual End Date, Air Program(s). If the CM activity is a stack test, provide Stack Test Status. Scroll to bottom and select SAVE.</p>	3 minutes
				<p>If already in AFS, Update Plant Action (Action Number, Action Air Program(s), Action Type, Date Achieved, and possibly Results code, RDE8 and Pollutant Code). Press ENTER to SAVE.</p>	3 minutes	<p>If already logged into ICIS-air, select Compliance Monitoring-Inspection/Evaluation for State. Supply information for Compliance Monitoring Identifier, Compliance Monitoring Type, Linked facilities, Actual End Date and Air Program(s). If the CM activity is a Stack Test, provide Stack Test Status. Scroll to bottom and select SAVE.</p>	2 minutes

8

Add a Enforcement action	Frequent use	Used to add Informal and formal enforcement actions to an existing facility	If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Supply information for Plant Action (Action Number, Action Air Program(s), Action Type, Date Achieved, possibly Results code, RDE8 and Pollutant Code. Press ENTER to SAVE.	5 minutes	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select Enforcement Actions and choose Formal, Judicial or Informal for your agency. For a Formal Enforcement action, (1) check Administrative Order, link facility(s) and provide Air Program(s) Violated. Click SAVE; (2) Select ADD FINAL ORDER sublink. Supply Final Order Type & Issued date. Click SAVE; (3) Select PENALTY sublink, supply Assessed cash Penalty in the Penalty to be Paid to field. Click SAVE. (4) Select Milestones sublink. Provide Complaint Filed/Proposed Order Final Date. Click SAVE	4 minutes
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				<p>If already logged into AFS, Update Plant Action (Action Number, Action Air Program(s), Action Type, Date Achieved, possibly Results code, RDE8 and Pollutant Code. Press ENTER to SAVE.</p>	<p>3 minutes</p>	<p>If already logged into ICIS-air select Enforcement Actions and choose Formal, Judicial or Informal for your agency. For a Formal Enforcement action, (1) check Administrative Order, link facility(s) and provide Air Program(s) Violated. Click SAVE; (2) Select ADD FINAL ORDER sublink. Supply Final Order Type & Issued date. Click SAVE; (3) Select PENALTY sublink, supply Assessed cash Penalty in the Penalty to be Paid to field. Click SAVE. (4) Select Milestones sublink. Provide Complaint Filed/Proposed Order Final Date. Click SAVE</p>	<p>3 minutes</p>
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9	Add Comments to a Facility or Action	Infrequent use	Used whenever a comment is added to either a facility or an action	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Supply information for Plant Comment (Action Number (if for an action), Comment number and Comment text). Press ENTER to SAVE</p>	5 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Search for and select the CM activity or Enforcement active that is receiving the comment. If the Comment is non-sensitive, scroll down to the Comment field on the activity record. Enter Comment and click SAVE. If the Comment is sensitive, select the Sensitive Comment sublink of the activity receiving the comment. Enter Comment text and click SAVE.</p>	2 minutes
				<p>If already logged into AFS, Update Plant Comment by providing an Action Number (if for an action), Comment Number and Comment Text). Press ENTER to SAVE.</p>	2 minutes	<p>If already logged into ICIS-air, search for and select the CM activity or Enforcement active that is receiving the comment. If the Comment is non-sensitive, scroll down to the Comment field on the activity record. Enter Comment and click SAVE. If the Comment is sensitive, select the Sensitive Comment sublink of the activity receiving the comment. Enter Comment text and click SAVE.</p>	1 minute

10	Add a facility to CMS	Once a year or whenever CMS Plan is modified	Used whenever a facility is added to the biannual CMS Plan	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Supply information for Plant CMS (CMS Category and CMS Frequency). Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select CMS. Select ADD CMS. Enter CMS Source Category and CMS Minimum Frequency. Select SAVE.</p>	2 minutes
				<p>If already logged into AFS, Update Plant CMS (CMS Category and CMS Frequency). Press ENTER to SAVE.</p>	1 minute	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select CMS. Select ADD CMS. Enter CMS Source Category and CMS Minimum Frequency. Select SAVE.</p>	1 minute

11	Add HPV	Frequently used	Used whenever an HPV is added	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, CNTY, PCDS. Update Plant Action as a Key action by providing Action Number, Air Program(s), Action Type, Date Achieved, Pollutant Code and linking information that may include Discovering Agency, and Violation Type Code(s). Press ENTER to SAVE.</p>	6 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Select facility from search list. Select Case Files. (1) Select ADD CASE FILE. Provide Case File Identifier, Link facility if needed, Air Program(s), Applicable Pollutants. Scroll to bottom and click SAVE AND ADD AIR VIOLATIONS. (2) Enter HPV/FRV details by clicking on the ADD AIR VIOLATION link on the Air HPV/FRV Details TAB. Select Violation Type, Pollutant & Program from drop down list. Enter FRV or HPV date. Select SAVE.</p>	4 minutes
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				<p>If already logged into AFS, Update Plant Action as a Key action by providing Action Number, Air Program(s), Action Type, Date Achieved, Pollutant Code and linking information that may include Discovering Agency and Violation Type Code(s). Press ENTER to SAVE.</p>	3 minutes	<p>If already logged into ICIS-air, select AIR then search for desired facility. Select facility from search list. Select Case Files. (1) Select ADD CASE FILE. Provide Case File Identifier, Link facility if needed, Air Program(s), Applicable Pollutants. Scroll to bottom and click SAVE AND ADD AIR VIOLATIONS. (2) Enter HPV/FRV details by clicking on the ADD AIR VIOLATION link on the Air HPV/FRV Details TAB. Select Violation Type, Pollutant & Program from drop down list. Enter FRV or HPV date. Select SAVE.</p>	3 minutes
12	Add/Link Discovery action to Day Zero	Frequently used	Used whenever a Discovery action is linked to it is Day Zero	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County and Plant ID. Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Discovery Action on the action linking screen. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If Discovery action has already been entered, Click Case Files. Select Case File Id from list. Click Compliance Monitoring activities. Click LIST TO LINK. Select desired CM activities to be linked to Case file. Click LINK. If Discovery action has not already been entered, first add CM activity and then link it to the Case File.</p>	2 minutes if Discovery action already exists; 3.5 minutes if Discovery action does not exist

				<p>If already logged into AFS, Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Discovery Action on the action linking screen. Press ENTER to SAVE.</p>	1 minute	<p>If already logged into ICIS-air, select AIR then search for desired facility. If Discovery action has already been entered, Click Case Files. Select Case File Id from list. Click Compliance Monitoring activities. Click LIST TO LINK. Select desired CM activities to be linked to Case file. Click LINK. If Discovery action has not already been entered, first add CM activity and then link it to the Case File.</p>	<p>1 minutes if Discovery action already exists; 1.5 minutes if Discovery action does not exist</p>
13	Add/Link NOV action to Day Zero	Frequently used	Used whenever an NOV is Added/linked to it is Day Zero	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the NOV Action on the action linking screen. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If NOV action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Informal Enforcement activities to be linked to Case file. Click LINK. If NOV action has not already been entered, first add NOV activity and then link it to the Case File.</p>	<p>2 minutes if NOV action already exists; 3.5 minutes if NOV action does not exist</p>

				<p>If already logged into AFS, Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the NOV Action on the action linking screen. Press ENTER to SAVE.</p>	1 minute	<p>If already logged into ICIS-air, select AIR then search for desired facility. If NOV action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Informal Enforcement activities to be linked to Case file. Click LINK. If NOV action has not already been entered, first add NOV activity and then link it to the Case File.</p>	<p>1 minutes if NOV action already exists; 1.5 minutes if NOV action does not exist</p>
14	Add/Link Addressing action to Day Zero	Frequently used	Used whenever an Addressing is Added/linked to it is Day Zero	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Addressing action on the linking screen. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. If Addressing action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Enforcement activities to be linked to Case file. Click LINK. If Addressing action has not already been entered, first add addressing activity and then link it to the Case File.</p>	<p>2 minutes if addressing action already exists; 3.5 minutes if addressing action does not exist</p>

				<p>If already logged into AFS, Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Addressing action on the action linking screen. Press ENTER to SAVE.</p>	1 minute	<p>If already logged into ICIS-air, select AIR then search for desired facility. If Addressing action has already been entered, Click Case Files. Select Case File Id from list. Click Enforcement activities. Click LIST TO LINK. Select desired Enforcement activities to be linked to Case file. Click LINK. If Addressing action has not already been entered, first add addressing activity and then link it to the Case File.</p>	<p>1 minute if addressing action already exists; 3.5 minutes if addressing action does not exist</p>
15	Add/Link Resolution action to Day Zero	Frequently used	Used whenever a Resolution action is Added/linked to it is Day Zero	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Resolution action on the linking screen. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. Click on the Addressing Action to edit the record and navigate to the Final Order sublink. Click the desired Final Order and an Air Resolved date on the Dates tab. Scroll to bottom of page and click SAVE.</p>	2.5 minutes

				<p>If already logged into AFS, Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Resolution action on the linking screen. Press ENTER to SAVE.</p>	1 minute	<p>If logged into ICIS-air, select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. Click on the Addressing Action to edit the record and navigate to the Final Order sublink. Click the desired Final Order and an Air Resolved date on the Dates tab. Scroll to bottom of page and click SAVE.</p>	1.5 minute
16	Add/Link Lead change action to Day Zero	infrequently used	Used whenever a Lead changes takes place for an HPV	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Lead Change action on the linking screen. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. If Case has not been Addressed, point to the Addressing Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE. If Case has already been Addressed, point to the Resolving Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE.</p>	2.5 minutes

				<p>If already logged into AFS, Update Plant Action by providing the Key action Number, Action Type & Date Achieved of the Lead Change action on the linking screen. Press ENTER to SAVE.</p>	1 minute	<p>If already logged into ICIS-air, select AIR then search for desired facility. Click Case File. Select desired Case file. Scroll down to Pathway Activities. If Case has not been Addressed, point to the Addressing Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE. If Case has already been Addressed, point to the Resolving Action and to the pull down list for OTHER. Select LEAD CHANGE & supply a date. Scroll to bottom of page and click SAVE.</p>	1.5 minutes
17	Change Plant General	Moderate use	<p>Used when a Plant Name, Street address, City Name, Zip Code, NAICS or Governmental Facility Code changes are needed in AFS</p>	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Update Plant Identification and Update desired Plant General fields (Plant Name, Street Address, City Name, Zip Code, NAICS or Governmental Facility Code. Press ENTER to SAVE.</p>	5 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Update Plant Name, Street Address and Zip Code. Select SAVE.</p>	3 minutes
				<p>If already logged into AFS, Update desired Plant General fields (Plant Name, Street Address, City Name, Zip Code, NAICS or Governmental Facility Code. Press ENTER to SAVE.</p>	2 minutes	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Update Plant Name, Street Address and Zip Code. Select SAVE.</p>	1.5 minutes

18	Change to Operating status	Moderate use	Used whenever the operating status of a regulated air program changes	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Go to Plant Air Program and supply the desired air program. Update the Operating Status field. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Air Programs. Select the Air Programs Description link. Enter Operating Status in Edit Current Operating Status. Select SAVE.</p>	3 minutes
				<p>If already in desired facility, go to Update Plant Air Program and supply the desired Air Program. Update the Operating Status field. Press ENTER to SAVE.</p>	1 minute	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select Air Programs. Select the Air Programs Description link. Enter new Operating Status in Edit Current Operating Status. Select SAVE.</p>	1 minute
19	Change Compliance Status	Frequent	Used whenever the Compliance status of a pollutant or facility changes	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Go to Update Plant Air Program Pollutant, supply Air Program and Air Program Pollutant and update State Pollutant Compliance Status. Press ENTER to SAVE.</p>	4 minutes	Not needed for ICIS-air	N/A

				If already in desired facility, go to Update Plant Air Program Pollutant, supply Air Program and Air Program Pollutant and update State Pollutant Compliance Status. Press ENTER to SAVE.	1 minute		
20	Change a Compliance Monitoring action	Moderate use	Used to modify the results of a stack test or add the received date to a TVACC; also used to correct data entry errors on an action	If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County & Plant ID. Go to Update Plant Action, supply Action Number, update Results Code and Date Achieved. Press ENTER to SAVE.	4 minutes	If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Compliance Monitoring. Filter to find Stack Tests. Select Compliance Monitoring ID/Activity Id from filtered list. Select new Stack Test Status. Select SAVE.	3.5 minutes
				If already in desired facility, go to Update Plant Action, supply Action Number, update Results Code and Date Achieved. Press ENTER to SAVE.	1 minute	If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select Compliance Monitoring. Filter to find Stack Tests. Select Compliance Monitoring ID/Activity Id from filtered list. Select new Stack Test Status. Select SAVE.	1 minute

21	Modify CMS data for a facility	Moderate use	Used to modify CMS Category (class changes)	<p>If not already logged into AFS, execute HOD and logon to mainframe. Go to AIRS main menu and select Update AFS Online. Supply the State, County and Plant ID. Go to Compliance Monitoring Strategy and update CMS Category. Press ENTER to SAVE.</p>	4 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select CMS. Select CMS Start Date link. Change CMS Category. Select SAVE.</p>	3 minutes
				<p>If already in desired facility, go to Compliance Monitoring Strategy and update CMS Category. Press ENTER to SAVE.</p>	1 minute	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list. Select CMS. Select CMS Start Date link. Change CMS Category. Select SAVE.</p>	1 minute
22	Archive/Dearchive a facility	Infrequent use	Used when a facility has inactive for >5 years	<p>If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Select Option 4 of the Main Menu than Utility Menu Option 6 (Archive) or Option 7 (De-archive). Supply State, County and Plant ID. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File to process the file.</p>	5 minutes	Not needed for ICIS-air	N/A

				<p>If already logged onto the mainframe, Select Option 4 of the Main Menu than Option 6 (Archive) or Option 7 (De-archive) on the Utility menu. Supply State, County and Plant ID. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File) to process the file.</p>	2 minutes		
23	Delete information	Moderate use	Used to remove duplicates or data entry errors	<p>If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Select Option 4 of the Main Menu than Utility Menu Option 2 (Delete Information), Plant Level. Supply the State, County & Plant ID. If not deleting the entire facility, also provide key information for desired record. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File) to process the file.</p>	5 minutes	<p>If not already logged into ICIS-air, point browser to https://icisairtest.epa.gov/icis and logon using WAM User ID and password. Select AIR then Search for Facility. Select facility from Search list. Select Compliance Monitoring. Filter to find action. Select Delete for action to be deleted on filtered list. Select YES to delete.</p>	4 minutes

				<p>If already logged onto the mainframe, select Update AFS Online and Option 4 of the Main Menu; Select Utility Menu Option 2 (Delete Information), Plant Level. Supply the State, County & Plant ID. If not deleting the entire facility, also provide key information for desired record. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File) to process the file.</p>	2 minutes	<p>If logged into ICIS-air, search for desired facility. Select AIR then search for desired facility. Select facility from search list Select Compliance Monitoring. Filter to find action. Select Delete for action to be deleted on filtered list. Select YES to delete.</p>	2 minutes
24	Source Swap	Infrequent use	Used to change the geographic location or plant ID	<p>If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Option 4 of the Main Menu than Utility Menu Option 5 (Source Swap). Supply current State, County and Plant ID and new State, County and Plant ID. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File) to process the file.</p>	5 minutes	Not needed for ICIS-air	N/A
				<p>If already logged onto the mainframe, Select Option 4 of the Main Menu than Option 5 (Source Swap) on the Utility menu. Supply current State, County and Plant ID and new State, County and Plant ID. Press ENTER to SAVE. If manual Utility User, select Option 11 (submit Current Utility File) to process the file.</p>	2 minutes		

25	User JCL Parameters	Infrequent use	Used to provide or changes defaults user JCL parameters	If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Select Option 4 of the Main Menu; Option Utility Menu Option 8 (User JCL Parameters). Enter new JCL parameters. Press ENTER to SAVE.	6 minutes	Not needed for ICIS-air	N/A
				If already logged onto the mainframe, Select Option 4 of the Main Menu; Option Option 8 (User JCL Parameters) on the Utility menu. Enter new JCL parameters. Press ENTER to SAVE.	3 minutes		
26	Table File Lookup	Frequent use	Used to obtain valid table values either online or hard copy	If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Select Option 4 of the Main Menu than Utility Menu Option 9 (Table File Lookup). Select desired table, List On-line or Batch. Supply desired filter fields. Press ENTER to view table values or run batch report.	5 minutes	Not needed for ICIS-air	N/A
				If already logged onto the mainframe, select Option 4 of the Main Menu than Utility Menu Option 9 (Table File Lookup). Select desired table, List On-line or Batch. Supply desired filter fields. Press ENTER to view table values or run batch report.	2 minutes		

27	Update AFS Plant ID	Infrequent use	Used to add/change an AFS ID for a facility (used for TV Permit information)	If not logged on, use HOD to LOGON to the mainframe, select Update AFS Online and Select Option 4 of the Main Menu than Utility Menu Option 10 (Update AFS Plant ID). Supply current and new AFS ids. Press ENTER to SAVE. If a manual Utility user, select Option 11 from the Utilit menu to process the request.	4 minutes	Not needed for ICIS-air	N/A
				If already logged onto the mainframe, Select Option 4 of the Main Menu than Option 10 (Update AFS Plant ID). Supply current and new AFS ids. Press ENTER to SAVE. If a manual Utility user, select Option 11 from the Utility menu to process the request.	2 minutes		
28	Submit Utility File	Moderate use	Used whenever a Manual Utility User needs to submit a utility request	If not logged on, use HOD to LOGON to the mainframe, select Option 4 of the Main Menu than Utility Menu Option 11 (Submit Current Utility File). Supply Utility file name or accept default name, supply reject file name. Press ENTER to continue to JCL page to process.	5 minutes	Not needed for ICIS-air	N/A

			<p>If already logged onto the mainframe, Select Option 4 of the Main Menu than Option 11 (Submit Current Utility File). Supply Utility file name or accept default name, supply reject file name. Press ENTER to continue to JCL page to process.</p>	<p>2 minutes</p>		
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