



August 4, 2025

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2004-0489
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To Whom It May Concern:

This letter is submitted on behalf of the members of the Western States Air Resources Council (WESTAR), to provide comments on the U.S. Environmental Protection Agency's (EPA's) information collection request (ICR), "Air Emissions Reporting Requirements (Renewal) posted on June 5, 2025. WESTAR is a regional, non-partisan, non-profit association representing the 15 western state air pollution control agencies. Emissions inventory data work has always been a foundational technical focus for WESTAR. Our member agencies support accurate estimation, collection, and reporting of emissions data while being mindful of the resources required to do so. Therefore, WESTAR often assists member agencies by sharing resources to collect regional emissions inventory data that can be used for planning and analysis, submitted to the National Emissions Inventory (NEI), and used as inputs for emissions and photochemical modeling. Our member agencies acknowledge that the Air Emissions Reporting Rule (AERR) is an important rule that supports EI data collection and subsequent dissemination to agencies and the public for use in air quality management across all jurisdictions. WESTAR supports EPA's continued effort to collect and maintain high-quality emissions inventory data, which supports these important planning and public health functions.

With that, WESTAR is providing a few comments and points on this ICR renewal, specifically. First, EPA's use of publicly available data sources to estimate the cost burden estimates is helpful and in keeping with previous ICRs, making it easier for stakeholders to verify updates and changes. For example, the updated labor costs, while for some western states are somewhat high, seem reasonable overall. We recognize that a conservative approach to calculating the overall cost burden can ultimately support states in operating their programs effectively.

Also, we appreciate that EPA has tried to estimate in the ICR the actual costs associated with an air agency's own IT systems that collect EI data. Tasks such as internal EI database management and maintenance, as well as data formatting and QA/QC, all require significant time and resources. The fact that EPA has attempted to include these costs in the ICR is helpful to agencies. Also appreciated are the estimated costs to industry to comply with state rules that are aligned with the AERR. Together, these new data points provide a better picture of the cost burden of the AERR.

This ICR also attempts to estimate the cost burden of reporting voluntary data elements such as HAPs, smaller point sources, and fire emissions data. In past ICRs, the cost burden to the states for

voluntary reporting has not been characterized, and WESTAR member agencies appreciate the new direction. However, EI reporters have noted that, in practice, these elements are often treated as expected parts of a complete emissions inventory submission. For example, while the AERR allows agricultural fires to be reported as nonpoint sources, EPA's data reporting systems request that these be submitted as events, which means the agency must adjust its data tracking and preparation for this sector. In some cases, this is not possible. Similarly, control path data, while not mandated in the rule and lacking a fully implemented schema, is requested during data validation. The situation created is one in which voluntary reporting seemingly becomes necessary in order to submit an inventory to EPA successfully.

While this issue isn't directly related to the technical details of the ICR – where EPA has mentioned it is mainly looking for feedback – WESTAR wants to bring this to EPA's attention. In many cases, states, locals, and Tribes are willing to submit voluntary data to improve the overall dataset, but without regulatory authority or simpler data formats and submission methods, submitting voluntary data should not get in the way of submitting the required data.

Thank you for the opportunity to provide comments on this ICR. If you have any questions about our comments or feedback, please contact Mary Uhl, WESTAR Executive Director at maryuhl@westar.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bo Wilkins', with a stylized, cursive script.

Bo Wilkins
Western States Air Resources Council President