#### SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

#### **NSPS for Stationary Gas Turbines**

## 1. Identification of the Information Collection

#### 1(a) Title of the Information Collection

NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG) (Renewal)

#### 1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS), for the regulations published at 40 CFR part 60, subpart GG were proposed on October 3, 1977, and promulgated on September 10, 1979 (44 <u>FR</u> 52798). These regulations apply to existing facilities and new facilities that have stationary gas turbines with a heat input at peak load equal or greater than 10.7 gigajoules per hour (based on the lower heating value of the fuel fired). New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart GG.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS. Specifically, data is being collected on performance of the continuous monitoring systems for Sulfur Dioxide (SO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>), and any excess emissions or operating parameter exceedances. Recordkeeping is used to document the sulfur and nitrogen content of the fuel; fuel to water ratio; rate of fuel consumption; and ambient conditions. The fuel sulfur content and fuel to water ratio measurements are used to monitor SO<sub>2</sub> and NO<sub>x</sub> emissions, respectively. This data will be sent to the delegated state or United States Environmental Protection Agency region and entered into the AIRS Facility Subsystem (AFS) database.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 535 facilities per year will be subject to the standard, and it is estimated that no additional sources per year will becoming subject to the

standard in the next three years.

There are approximately 535 stationary gas turbines facilities in the United States, which are all publicly owned and operated by the stationary gas turbines industry. None of the 535 facilities in the United States are owned by either state, local, tribal or the Federal Government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the "Affected Public" listed below in Table 1: Annual Industry Burden and Cost - NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG). The Federal Government burden does not include work performed by Federal employees only work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG).

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

#### 2. Need for and Use of the Collection

#### 2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

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

In the Administrator's judgment,  $SO_2$  and  $NO_x$  emissions from stationary gas turbines cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart GG.

## 2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

## 3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart GG.

## 3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

## 3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the <u>Federal Register</u> (71 <u>FR</u> 58853) on October 5, 2006. No comments were received on the

burden published in the <u>Federal Register</u>.

## **3(c)** Consultations

Over the next three years, an average of 535 facilities per year will be subject to the standard, with no additional sources per year becoming subject to the standard. We have also determined that approximately 5 percent of the respondents are reporting electronically.

In estimating the affected number of sources, the growth rate, and the accuracy of other data for stationary gas turbines facilities subject to this standard, we contacted the Electric Power Research Institute, Mr. Dan Rastler at (650) 855-2521, the Department of Energy, Mr. Tom Leckey at (202) 586-3548, and the American Petroleum Institute, Ms. Cindy Schild at (202) 682-8482. We also referenced the most recent ICR, and used other internal resources to obtain the most recent data available. We reviewed information available from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

## 3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

## 3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

## 3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI,) (see 40 CFR 2; 41 <u>FR</u> 36902, September 1, 1976; amended by 43 <u>FR</u> 40000, September 8, 1978; 43 <u>FR</u> 42251, September 20, 1978; 44 <u>FR</u> 17674, March 23, 1979).

## 3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

## 4. The Respondents and the Information Requested

## 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are stationary gas turbines. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) code could be found in the following table:

Other Food Cropp Creek in Under Course		
Other Food Crops Grown Under Cover	0182	111411
Gas and Petroleum Extraction	1311	211111
Natural Gas Liquids Extractions	1321	211112
Crushed and Broken Limestone Mining and Quarrying	1422	212312
All Other Special Trade Contractors	1799	235990
Breakfast Cereal Manufacturing	2043	311230
Chewing Gum	2067	311340
Soybean Oil Mills	2075	311225
Shortening, Table Oils, Margarine, and other Edible Fats and Oils	2079	311225
Malt Beverages	2082	312120
Narrow Fabric and other Small Ware Mills	2241	313221
Non-woven Fabrics	2297	313230
Pulp Mills	2611	322110
Paper Mills	2621	322121
Corrugated and Solid Fiber Boxes Manufacturing	2653	322211
Alkalies and Chlorine Manufacturing	2812	325181
Inorganic Dye and Pigment Manufacturing	2816	325131
Plastics Material and Synthetic Resins and Non-vulcanizable Elastomers	2821	325211
Medical Chemicals and Botanical Products	2833	325411
Pharmaceutical Preparations	2834	325412
Cycle Organic Crude and Intermediates, and Organic Dyes and Pigments	2865	325110
Industrial Organic Chemicals	2869	325110
Nitrogenous Fertilizers	2873	325311
Paint and Coating Manufacturing	2899	325510
Petroleum Refineries	2911	324110

40 CFR part 60, subpart GG	SIC Codes	NAICS Codes	
Other Aluminum Rolling and Drawing	3357	331319	
Copper Wire Drawing	3357	331422	
Electroplating, Plating, Polishing, Anodizing, and Coloring	3471	332813	
Turbine and Turbine Generator Set Unit Manufacturing	3511	333611	
Aircraft Engines and Engine Parts Manufacturing	3724	336412	
Travel Trailer and Camper Manufacturing	3799	336214	
All Other Miscellaneous Chemical Product and Preparation Manufacturing	3999	325998	
Airports, Flying Fields, and Airport Terminal Services	4581	488119	
Pipeline Transportation of Refined Petroleum Products	4613	486910	
All Other Pipeline Transportation	4619	486990	
Wired Telecommunication Carriers	4813	517110	
Fossil Fuel Electric Power Generation	4911	221112	
Pipeline Transportation of Natural Gas	4922	486210	
Natural Gas Transmission and Distribution	4923	221210	
Natural Gas Distribution	4924	221210	
Mixed, Manufactured, or Liquified Petroleum Gas Production and/or Distribution	4925	221210	
Fossil Fuel Electric Power Generation	4931	221112	
Gas and Other Services Combined	4932	221210	
Fossil Fuel Electric Power Generation	4939	221112	
Sewage Treatment Systems	4952	221320	
Material Recovery Facilities	4953	562920	
Solid Waste Combustors and Incinerators	4953	562213	
Steam and Air-conditioning Supply	4961	221330	
Plumbing and Heating Equipment Supplies (Hydronics)	5074	421720	
Other Groceries and Related Products Wholesalers	5149	422490	
Petroleum Bulk Stations and Terminals	5171	422710	
Offices of Real Estate Agents and Brokers	6531	531210	
General Medical and Surgical Hospitals	8062	622110	
Colleges, Universities, and Professional Schools	8221	611310	

40 CFR part 60, subpart GG	SIC Codes	NAICS Codes
Other Scientific and Technical Consulting Services	8999	541690
Police Protection	9221	922120
Administration of Public Health Programs	9431	923120
National Security	9711	928110

## 4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

## (i) Data Items

In this ICR, all the data recorded or reported is required by the New Source Performance Standards for Stationary Gas Turbines (40 CFR part 60, subpart GG).

## A source must make the following reports:

Notifications	
Notification of construction or reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of performance tests	60.8(d)
Notification of a demonstration of continuous monitoring system	60.7(a)(5)

Reports			
Report on initial performance test results	60.8(a)		
Report of excess emissions and monitoring systems performance	60.7(c), 60.334(c)		

A source must keep the following records:

Recordkeeping				
Maintain records of startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)			
Maintain records of fuel consumption and fuel to water ratio in the turbine, for sources using water injection to control NO <sub>x</sub> emissions	60.334(a)			
Maintain records of sulfur and nitrogen content of fuel used in turbine	60.334(b)			

Recordkeeping	
Maintain records of all measurements, including continuous monitoring system, monitoring device, performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks.	60.7(f)
Maintain all records for two years	60.7(f)

## **Electronic Reporting**

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 5 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for $NO_x$ and $SO_2$ , or for pressure drop and liquid supply pressure for water injection $NO_x$ control devices.
Perform initial performance test, Reference Method 20 test, and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

## 5. The Information Collected: Agency Activities, Collection Methodology, and Information

#### Management

#### 5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

#### 5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is an EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for two years.

#### 5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses,) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

#### 5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NSPS Stationary Gas Turbines (40 CFR part 60, subpart GG).

## 6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

## 6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 59,519 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

## 6(b) Estimating Respondent Costs

## (i) Estimating Labor Costs

This ICR uses a Technical Labor Rate of \$64.47 per hour. This rate is from the United States Department of Labor, Bureau of Labor Statistics, September 2003, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only cost to the regulated industry resulting from information collection activities in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

## (iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

## 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$171,542. (See Table 2: Average Annual EPA Burden and cost - NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG), below.

This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$40.08. These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG), below.

#### 6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, approximately 535 existing sources are currently subject to the standard. It is estimated that no additional sources per year will become subject to the standard in the next three years. The overall average number of respondents, as shown in the table below is 535 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents							
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	Respondents ThatRespondents ThatKeep Records But DoAre Also New			
1	0	535	0	0	535		
2	0	535	0	0	535		
3	0	535	0	0	535		
Average	0	535	0	0	535		

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 535.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses							
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC) +D			
Notification of construction/reconstruction	0	1	n/a	0			
Notification of actual startup	0	1	n/a	0			
Notification of initial performance test	0	1.2	n/a	0			
Notification of demonstration of CMS	0	1	n/a	0			
Semiannual report	535	2	n/a	1,070			
			Total	1,070			

The number of total respondents is 535

The number of Total Annual Responses is 1,070. This is the number in column E of the Respondent Universe and Number of Responses per year in table above.

The total annual labor costs are \$3,837,190. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG), below.

## 6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

## (i) Respondent Tally

The total annual labor costs are \$3,837,190. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 hours per response.

The total annual capital/startup and O&M cost to the regulated entity are zero.

## (ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 4,280 labor hours at a cost of \$171,542. See Table 2. Annual Agency Burden and Cost: NSPS for Stationary Gas Turbines (40 CFR part 60, subpart GG), below.

## 6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the precious ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

#### 6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 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, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2006-0775. An electronic version of the public docket is available at http://www.regulations.gov which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0775 and OMB Control Number 2060-0028 in any correspondence.

## Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

		(A)	(B)	(C)	(D)	(E)	(H)
Burden item	Notes	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year (a)	Technical person- hours per year (E=CxD)	Cost {\$} (b)
1. Applications		N/A					
2. Survey and Studies		N/A					
3. Reporting requirements							
A. Read instructions		1	1	1	0	0	\$0
B. Required activities							
Initial performance tests		110	1	110	0	0	\$0
Repeat performance test	С	110	0.2	22	0	0	\$0
C. Create information		See 3B					
D. Gather existing information		See 3E					
E. Write report							
Notify of construction/reconstruction		2	1	2	0	0	\$0
Notify of actual startup		2	1	2	0	0	\$0
Notify of initial performance test	С	2	1.2	2.4	0	0	\$0
Notification of demonstration of CMS		2	1	2	0	0	\$0
Report of performance test		See 3B					
Excess emission and exemption reports	d	10	2	20	535	10,700	\$689,829
4. Recordkeeping requirements							
A. Read instructions		See 3A					
B. Plan activities		See 4C					
Implement activities		See 3B					
Develop record system		N/A					
C. Time to check computer system and calibrate continuous monitor	e	0.25	365	91.25	535	48,819	\$3,147,361
D. Train personnel		N/A					
E. Audits		N/A					
TOTAL ANNUAL BURDEN AND COST (rounded)						59,519	\$3,837,190

# Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR part 60, supart GG)

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 535. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

b. Assume a technical hourly wage of \$64.47. This rate is from the United States Department of Labor, Bureau of Labor Statistics, November 2003, "Table 10. Private industry, by occupational and industry group." This amount was multiplied by the hour per year in column E. The Total Annual Burden includes 110% overhead.

c. We have assumed that 20% of initial performance test will be repeated due to failure.

d. We have assumed that it will take each of the 535 respondents 10 hours to write the excess emissions and exemption report 2 times per year.

e. We have assumed that it will take 365 days per year to check and monitor systems.

		(A)	(B)	(C)	(D)	(E)	(F)
Burden item	Notes	EPA Person Hrs/ Occurrence	Occurrences Plant/year	EPA hrs/ plant/year (C=AxB)	Respondents per year (a)	Total EPA Annual Person Hrs (E=CXD)	Cost {\$} (b)
1. Performance test							
New plants	С	24	1.2	28.8	0	0	\$0
2. Report review							
Notified of construction		2	1	2	0	0	\$0
Notified of actual startup		0.5	1	0.5	0	0	\$0
Notified of initial test	С	0.5	1.2	0.6	0	0	\$0
Notified of CMS demonstration		0.5	1	0.5	0	0	\$0
3. Semiannual reports							
Excess emissions and exemption reports	d	4	2	8	535	4,280	\$171,542
TOTAL ANNUAL EPA BURDEN (rounded)						4,280	\$171,542

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 535. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

b. The cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$40.08. This rate is from the Office of Personnel Management (OPM) "2003 General Schedule" which excludes locality rates of pay.

c. We have assumed that 20% of initial performance test will be repeated due to failure.

d. We have assumed that each of the 535 respondents will take 4 hours to complete the excess emissions and exemption report 2 times per year.