SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Stationary Reciprocating Internal Combustion Engines

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ) (Renewal)

1(b) Short Characterization/Abstract

The NESHAP regulations published at 40 CFR part 63, subpart ZZZZ were proposed on December 19, 2002, and promulgated on June 15, 2004, and revised on June 26, 2006. The regulation applies to each new, reconstructed, and existing stationary reciprocating internal combustion engine (RICE) with a site-rating of more than 250 brake horsepower (hp) located at a major source of hazardous air pollutants (HAP) emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year.

In general, all NESHAP 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. The information collection activities also includes, stack tests and continuous operating parameter monitoring. This information is being collected to assure compliance with part 63, subpart ZZZZ.

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 five 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 three affected facilities 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 the number of respondents subject to the standard is estimated to be 4,104 which include both existing and new sources. We expect a growth rate of 874 new sources per year over the next three years of this ICR. The number of new sources includes new sources which are exempt but have an initial notification requirement (105 per year).

There are approximately 4,104 stationary reciprocating internal combustion engines

facilities in the United States, which are all publicly owned and operated by the stationary reciprocating internal combustion engines industry. None of these 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 in Table 1: Annual Industry Burden and Cost - NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ). The burden to the "Federal Government" is attributed entirely to work performed by Federal employees or government contractors which is listed in Table 2: Average Annual EPA Burden - NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ).

The active ICR had the following Terms of Clearance (TOC): "Under the terms of the Government Paperwork Elimination Act, EPA should review this collection before resubmitting it for approval and ensure that, to the extent practicable, the collection has been revised to include electronic means of reporting."

EPA has addressed this item of concern in the TOC by consultation with the stationary reciprocating internal combustion engines industry. At this time, it is estimated that approximately 10 percent of the respondents are submitting their reports electronically.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. 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, HAP emissions from stationary reciprocating internal combustion engines cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart ZZZZ.

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 63, subpart ZZZZ.

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 4,104 facilities per year will be subject to the standard, which includes an additional 874 new sources per year becoming subject to the standard. In estimating the affected number of sources and the growth rate of stationary

reciprocating internal combustion engines facilities subject to this standard, EPA contacted Mr. Roger Gault, at (312) 827-8700, from the Engine Manufacturers Association (EMA), Mr. Wade Newton, at (202) 326-5500, from the Alliance of Automobile Manufacturers, and Mr. Rosario Palmieri, at (202) 637-3000, from the National Association of Manufacturers (NAM). We referenced the most recent ICR, consulted with the preparer of the active ICR, and used other 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. We also consulted with EPA's Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 industrial, commercial, and institutional boilers and process heaters. 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:

40 CFR part 63, subpart ZZZZ	SIC Codes	NAICS Codes
Electric Power Generation, Transmission and Distribution	N/A	2211
Pipeline Transportation of Natural Gas	N/A	48621
Crude Petroleum and Natural Gas Extraction	N/A	211111
Natural Gas Liquid Extraction	N/A	211112
National Security	N/A	92811

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 National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ).

A source must make the following reports:

Notifications						
Initial notification	63.9(b)(2), 63.7545(b)					
Notification of intent to construct/reconstruct	63.9(b)					
Notification of start of construction	63.9(b)					
Notification of anticipated startup	63.9(b)					
Notification of compliance status	63.9(h), 63.6645					
Notification of performance test	63.9(e), 63.7545(d)					

Reports					
Semiannual compliance report	63.6650(b)				
Startup, shutdown, and malfunction plan	63.10(d)(5)(ii), 63.6650(c)				

Repo	orts
Annual report	63.6650

A source must keep the following records:

Recordkeeping						
Retain records for 5-years.	63.6660(b)					
Records of all notifications and reports	63.6555(a)(1)					
Records of the occurrence and duration of each startup, shutdown, or malfunction of the stationary RICE and each malfunction of the air pollution control equipment	63.6555(a)(2)					
Records of performance tests and performance evaluations	63.6655(a)(3)					
Records of any malfunction of the CEMS	63.6655(b)(1)					
Records of fuel use and hours of operation	63.7555(d)					
All CEMS calibration checks	63.6655(b)(1)					
All adjustments and maintenance performed on CEMS	63.6655(b)(1)					
Previous (i.e., superseded) versions of the performance evaluation plan	63.6655(b)(2)					
Request for alternatives to the relative accuracy test audit	63.6655(b)(3)					
Records of the date and time that each deviation started and stopped and whether the deviation occurred during a period of malfunction or during another period.	63.6655(b)(4)					
Records of daily fuel usage for landfill gas and digester gas fired units	63.6655(c)					
Records of the catalyst pressure drop (measured monthly) and catalyst inlet temperature (4-hours average)	63.6655(d)					
Records of the average reduction of CO emissions determined from CEMS measurements before and after the emission control device	63.6655(d)					

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 10 percent of the respondents use electronic reporting.

Respondent Activities

Read instructions.

Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.

Perform initial performance 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 five 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 NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR, part 63, subpart ZZZZ).

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 421,613 (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 NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

Managerial	\$105.86	(\$50.41 + 110%)
Technical	\$92.61	(\$44.10 + 110%)
Clerical	\$45.32	(\$21.58 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2006, "Table 2. Civilian Workers, 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 existing regulated respondents resulting from information collection activities required by the subject standard is labor costs. For existing regulated respondents, there is no capital/startup costs required for the purchase or the installation of equipment, because respondents comply by employing pollution prevention measures. New respondents have capital costs associated with the purchase of the equipment necessary for compliance as well as operation and maintenance costs. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs								
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for Device	(C) Number of New Respondents	(D) Total Capital/Start up Cost, (B X C)	(E) Annual O&M Costs	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)		
CO monitors	\$583	682	\$397,606	\$1,873	3,054	\$5,720,142		
Pressure and temperature (small)	\$1,708	769	\$1,313,452	N/A	N/A	\$0		
Pressure and temperature (large)	\$427	366	\$156,282	N/A	N/A	\$0		
Totals			\$1,867,340			\$5,720,142		

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

The total capital/startup costs to new respondents for this ICR are \$1,867,340. This is the

total of column D in the above table.

The total operation and maintenance (O&M) costs for all continuous monitoring devices is \$5,720,142. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$7,587,482.

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 \$1,235,732.

This cost is based on the average hourly labor rate as follows:

Managerial	\$58.18	(GS-13, Step 5, \$36.36 + 60%)
Technical	\$43.17	(GS-12, Step 1, \$26.98 + 60%)
Clerical	\$23.36	(GS-6, Step 3, \$14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ), attached.

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

Based on our research for this ICR, on average over the next three years, approximately 3,230 existing respondents will be subject to the standard. It is estimated that a total of 874 additional respondents per year will become subject. The overall average number of respondents, as shown in the table below is 4,104 per year.

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

	Number of Respondents							
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)			
1	874	2,356	0	0	3,230			
2	874	3,230	0	0	4,104			
3	874	4,104	0	0	4,978			
Average	874	3,230	0	0	4,104			

¹ New respondents 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 4,104.

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

г Г	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	769	1	0	769				
Notification of anticipated startup	769	1	0	769				
Notification of actual startup	769	1	0	769				
Notification of performance tests								
-one time per year	92	1	0	92				
-quarterly	1,605	4	0	6,420				
-semiannually	1,440	2	0	2,880				
Initial notification of exempt RICE	105	1	0	105				
Initial notification of compliance	769	1	0	769				
Compliance report	3,230	2	0	6,460				
			Total	19,033				

The number of Total Annual Responses is 19,033

The total annual labor costs are \$52,508,416. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ), attached.

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 \$52,508,416. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$7,587,482. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 20,466 labor hours at a cost of \$1,235, 732. See Table 2. Annual Agency Burden and Cost: NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ), attached.

6(f) Reasons for Change in Burden

There is an overall increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens due to two considerations. First, this ICR is a combination of two approved ICRs which cover the original promulgated standard and the revised standard that expanded applicability to stationary reciprocation internal combustion engines (RICE) 250 hp or greater. Secondly, there are a substantial number of new RICES added to the inventory each year. The overall result is an increase in burden hours and cost.

The above rationalizations also apples to the capital/startup and operation and maintenance (O&M) cost of this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 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-2006-0777. 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-2006-0777 and OMB Control Number 2060-0548 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondents Burden and Cost - NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63, subpart ZZZZ)

Subpart 2222		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(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)	Management person-hours per year (Ex0.05)	Clerical person- hours per year (Ex0.1)	Cost {\$} (b)
1. Applications		N/A							
2. Surveys and Studies		N/A							
3. Reporting Requirements									
A. Read Instructions	С	4	1	4	874	3,496	175	350	\$ 500,708
B. Required Activities									
-Performance Tests									
-initial performance tests	f	24	2	48	769	36,912	1,846	3,691	\$ 5,286,647
-4SRB > 5000 HP (once per year)	d	24	1	24	86	2,064	103	206	\$ 295,612
-4SRB >= 5000HP (once per year)	е	8	1	8	1	8	0	1	\$ 1,146
-quarterly - facility w/multiple		24	4	96	1,605	154,080	7,704	15,408	\$ 22,067,800
-quarterly - facility w/one RICE		6	1	6	5	30	2	3	\$ 4,297
-semiannual performance tests	g	24	2	48	1,440	69,120	3,456	6,912	\$ 9,899,574
C. Gather Existing Information		See 3D							
D. Write Report									
-Notification of construction/reconstruction	h	2	1	2	769	1,538	77	154	\$ 220,277
-Notification of anticipated startup	h	2	1	2	769	1,538	77	154	\$ 220,277
-Notification of actual startup	h	2	1	2	769	1,538	77	154	\$ 220,277
-Notification of performance test									
-once per year		2	1	2	87	174	9	17	\$ 24,921
-quarterly	i	2	4	8	1,605	12,840	642	1,284	\$

									1,838,983
-semiannual		2	2	4	1,440	5,760	288	576	\$ 824,964
-Notification of performance test (4SLB)	j	2	2	4	360	1,440	72	144	\$ 206,241
-Initial notification for exempt RICE		2	1	2	105	210	11	21	\$ 30,077
-Initial notification of compliance		2	1	2	769	1,538	77	154	\$ 220,277
-Compliance report	k	4	2	8	3,230	25,840	1,292	2,584	\$ 3,700,882
Subtotal						318,126	15,906	31,813	\$ 45,562,960
4. Recordkeeping Requirements									
A. Read Instructions		4	1	4	874	3,496	175	350	\$ 500,708
B. Train personnel	I	16	1	16	769	12,304	615	1,230	\$ 1,762,216
C. Continuous monitoring (record data)	m	1	12	6	3,230	19,380	969	1,938	\$ 2,775,662
-Record information	m	1	12	6	2,219	13,314	666	1,331	\$ 1,906,871
Subtotal						48,494	2,425	4,849	\$ 6,945,456
TOTAL ANNUAL BURDEN AND COST (rounded)							421,613		\$ 52,508,416

Assumptions:

a. We have assumed that the average number of existing respondents that will be subject to the rule will be 3,230. Also there will be 874 new sources per year that will become subject to the rule over the three-year period of this ICR.

b. This ICR uses the following labor rates: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, "Table 2. Civilian Workers, 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.

- c. We have assumed that it will take each of the 874 respondents four hours each to read the required instructions.
- d. We have assumed that 86 spark inginition, 4SRB<5000 HP respondents will take 24 hours each to conduct the performance tests.
- e. We have assumed that only 1 spark ignition, 4SRB>=5000hHP respondent will take 8 hours to conduct the performance tests.
- f. We have assumed that 350 4-stroke lean burn (4SLB) respondents will take 24 hours each to perform the initial performance tests.
- g. We have assumed that 350 4 SLB respondents will take 24 hours each twice a year to perform the performance tests.
- h. We have assumed that 769 respondents will be required to write report.

i. We have assumed that 1,605 respondents will each have to complete on a quarterly basis the performance test notification.

j. We have assumed that 360 4SLB respondents will have to complete the notification of performance test report.

k. We have assumed that each respondent will have to complete the compliance report two times per year.

I. We have assumed that it will take 16 hours for each respondent to train personne.

m. We have assumed that each respondent will take 0.5 hour twelve times per year to record information.

Table 2: Average Annual EPA Burden - NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ)

		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	Notes	EPA person- hours per occurrence	No. of occurrences per plant per year	EPA person hours per plant per year (C=AxB)	Plants per year (a)	Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person- hours per year (Ex0.1)	Cost {\$} (b)
Report Review									
1. Notification of construction/reconstruction	С	1	1	1	769	769	38	77	\$ 53,397
2. Notification of anticipated startup	С	1	1	1	769	385	19	38	\$ 26,698
3. Notification of actual startup	С	1	1	1	769	385	19	38	\$ 26,698
4. Notification of performance test	d	2	1	2	4,104	8,208	410	821	\$ 569,937
5. Initial notification for exempt RICE	е	1	1	1	105	53	3	5	\$ 3,645
6. Initial notification of compliance	f	2	1	2	769	1,538	77	154	\$ 106,794
7. Compliance report	g	2	1	2	3,230	6,460	323	646	\$ 448,562
TOTAL ANNUAL BURDEN AND COST (rounded)						17,797	890 20,466	1,780	\$ 1,235,732

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 2,534. There will be 753 additional new sources per year that will become subject to the rule over the three-year period of this ICR.

b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$58.18 (GS-13, Step 5, \$36.36 x 1.6), Technical rate of \$43.17 (GS-12, Step 1, \$26.96 x 1.6), and Clerical rate of \$23.36 (GS-6, Step 3, \$14.60 x 1.6). These rates are from the Office of Personnel Management (OPM) "2007 General Schedule" which excludes locality rates of pay.

c. We have assumed that 648 respondents will be required to review the notification report..

d. We have assumed that it will take each respondent 2 hours to review the performance test report. The figure (1.139) representing the number of occurrences per plant is a

weighted average of once per year, semiannual and quarterly performance tests.

- e. We have assumed that each source will take 0.5 hours to review the initial exemption notification.
- f. We have assumed that it will take each source two hours two times per year to review the initial compliance report.
- g. We have assumed that it will take each source two hours each to review compliance report.