

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Onshore Natural Gas Processing Plants**

**1. Identification of the Information Collection**

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

NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL)  
(Renewal)

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

The New Source Performance Standards (NSPS) for Equipment Leaks of volatile organic compound (VOC) from Onshore Natural Gas Processing Plants, published at 40 CFR part 60, subpart KKK, were proposed on January 20, 1984 and promulgated on June 24, 1985. These standards apply to the following affected facilities located at onshore natural gas processing plants: compressors in VOC service or in wet gas service, and the group of all equipment (except compressors) within a process unit. Affected facilities commenced construction, modification or reconstruction after the date of proposal. A process unit is defined as the equipment assembled for extraction of natural gas liquids from field gas, fractionation of liquids into natural gas products, or other processing of natural gas products.

The New Source Performance Standards (NSPS) for Onshore Natural Gas Processing: SO<sub>2</sub> Emissions, published at 40 CFR part 60, subpart LLL, were proposed on January 20, 1984 and promulgated on October 1, 1985. These standards apply to the following affected facilities located at onshore natural gas processing plants: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. Affected facilities commenced construction, modification or reconstruction after the date of proposal. A sweetening unit is defined as a process device that separates the hydrogen sulfide and carbon dioxide (CO<sub>2</sub>) contents from the sour natural gas stream. The provisions of subpart LLL do not apply to sweetening facilities that produce acid gas that is completely re-injected into oil or gas bearing geologic strata or that is otherwise not released to the atmosphere. The control and monitoring requirements of subpart LLL do not apply to affected facilities with design capacities of less than two long tons per day of hydrogen sulfide in the acid gas, expressed as sulfur.

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.

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 four affected facilities at each plant site for subpart KKK, along with one affected facility at each plant site for subpart LLL, and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

All of these sources subject to subpart LLL are also subject to subpart KKK. Over the next three years, an average of 563 sources per year will be subject to subpart KKK, and it is estimated that one additional source per year will become subject to the standard in the next three years. There are approximately 79 of these sources of these that are currently subject to subpart LLL, and it is estimated that three additional sources will become subject to the standard in the next three years.

There are approximately 563 onshore natural gas processing plants in the United States, which are all publicly owned and operated by the onshore natural gas processing industry. None of the 563 plants 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 Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL). 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 Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL).

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)(1).

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, VOC and sulfur dioxide emissions from onshore natural gas processing plants 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, subparts KKK and LLL.

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

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were 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 and quarterly 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, subparts

KKK and LLL.

### **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 Federal Register (72 FR 10736) on March 9, 2007. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

Over the next three years, an average of 563 facilities per year will be subject to the standard. In estimating the affected number of sources and the growth rate of onshore natural gas processing plants subject to this standard, EPA contacted Ms. Lynn Reed at (918) 588-7380, ONEOK, Incorporated, Mr. Lance Lodes at (405) 557-6846, OGE-Enogex, Incorporated, and Mr. Johnny Dreyer, (918) 493-3872, Gas Processors Association (GPA). We referenced 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**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 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 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 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:

<b>40 CFR part 60, subparts KKK and LLL</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Crude Petroleum and Natural Gas Extraction	1311	211111
Natural Gas Liquid Extraction	1321	211112

### **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 Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction or reconstruction	60.7(a)(1)
Notification of actual startup date	60.7(a)(3)
Notification of modification	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of initial performance test	60.8(d)
Semiannual reports of excess emissions (subparts KKK and LLL)	60.7(c)
Performance test results (subparts KKK and LLL)	60.8(a), 60.636(a), 60.487(e)

<b>Notifications</b>	
Semiannual reports (subpart KKK)	60.636(a)-(c), 60.487(a)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms (subpart LLL)	60.647(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of startups, shutdowns, malfunctions of affected facilities; malfunctions of control devices; and periods where the continuous monitoring system is inoperative.	60.7(b)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems.	60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect (subpart KKK).	60.632(a), 60.482-10(l)(1), (2)
Keep records of inspections of closed vent systems during which no leaks are detected (subpart KKK).	60.632(a), 60.482-10(l)(4), (5)
Perform attachment of identification numbers to leaking equipment (subpart KKK)	60.635(a), (b)
Keep records of leak detection and repair (subpart KKK)	60.632(a), 60.635(a), (b), 60.482-10(l)(3) 60.486(c)
Keep records of design requirements for and operation of closed vent systems and control devices (subpart KKK)	60.635(a), 60.486(d)
Keep records listing all equipment subject to subpart KKK	60.635(a), (b), 60.486(e)
Keep records of compliance tests (subpart KKK)	60.635(a), 60.486(e)(4)
Keep records of valves designated as unsafe or difficult to monitor (subpart KKK)	60.635(a), 60.486(f)
Keep records of design criterion that indicate failure (subpart KKK)	60.635(a), 60.486(h)
Keep records of parts not in VOC service or otherwise exempt (subpart KKK)	60.635(a), (c), 60.486(j)
Keep records of calculations and measurements (subpart LLL)	60.647(a)

<b>Recordkeeping</b>	
Facilities that choose to comply with 60.646(e) shall keep, for the life of the facility, records demonstrating that the facility design capacity is less than 150 long tons per day of hydrogen sulfide expressed as sulfur (subpart LLL)	60.647(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.

<b>Respondent Activities</b>
Read instructions.
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.
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.
Transmit, or otherwise disclose the information.
Perform initial performance test, reference the methods discussed in the rule language, and repeat performance tests if necessary. Applicable if controls are used (subpart KKK).
Monitor control devices to ensure that they are operated and maintained in conformance with design. Applicable if controls are used (subpart KKK).
Perform monthly monitoring of pumps in light liquid service and valves in gas/vapor service or in light liquid service (subpart KKK).
Repair pump, compressor, valve, and vapor collection system leaks (subpart KKK).
Perform weekly visual inspections of pumps in light liquid service (subpart KKK).

<b>Respondent Activities</b>
Monitor pressure relief devices in gas/vapor service for no detectable emissions, following pressure release (subpart KKK).
Monitor or repair leaks in pumps or valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and connectors (subpart KKK).
Conduct annual inspections of vapor collection systems (subpart KKK).
Install, calibrate, maintain and operate CMS for (a) total sulfur emission rate and (b) exhaust gas temperature for oxidation control systems or reduction control systems that are followed by an incinerator (subpart LLL).
Install, calibrate, maintain, and operate CMS for reduced sulfur compound emission rate for reduction control systems that are not followed by an incinerator (subpart LLL)
Perform initial performance test, reference the methods discussed in the rule language, and repeat performance tests if necessary (subpart LLL).
Perform daily monitoring of (a) accumulation of sulfur product and (b) H <sub>2</sub> S Concentration in the acid gas from the sweetening unit (subpart LLL).
Perform hourly monitoring of acid gas flow rate from the sweetening unit and calculate the daily average (subpart LLL).
Calculate (a) daily sulfur feed rate and (b) daily required SO <sub>2</sub> emission reduction efficiency (subpart LLL).

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.

<b>Agency Activities</b>
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, NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL).

## **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 149,180 (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 the following labor rates:

Managerial	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, Table 2.Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent <sup>1</sup>	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent <sup>1</sup>	(F) Number of Respondents with O&M <sup>2</sup>	(G) Total O&M, (E X F)
SO <sub>2</sub> CEM, control outlet only for subpart LLL	\$73,000	3	\$219,000	\$17,100	7	\$119,700

<sup>1</sup> Costs reflect installation and maintenance of an in-situ SO<sub>2</sub> CEM after the control device and assume installation occurred during the construction of the facility.

<sup>2</sup> After consultation with the industry we believe that the number of respondents needing continuous monitoring is seven.

The total capital/startup costs for this ICR are \$219,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$119,700. 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 \$338,700.

**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 \$501,916.

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

Managerial	\$54.66 (GS-13, Step 5, \$34.16 x 1.6)
Technical	\$40.56 (GS-12, Step 1, \$25.35 x 1.6)
Clerical	\$21.95 (GS-6, Step 3, \$13.72 x 1.6)

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, NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL), below.

### 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 563 existing respondents will be subject to the standard. It is estimated that one additional respondent will become subject to subpart KKK and three for subpart LLL over the next three years.

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

Number of Respondents					
Year	(A) Number of <sup>1</sup> New Respondents	(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)
Subpart KKK <sup>2</sup>					
1	113	561	0	112	562
2	113	562	0	112	563
3	113	563	0	112	564
Average	113	562	0	112	563
Subpart LLL <sup>3</sup>					
1	3	79	3	0	85
2	3	82	3	0	88
3	3	85	3	0	91
Average	3	82	3	0	88

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

<sup>2</sup> Based on industry consultation, EPA believes that approximately 20 percent of existing respondents for subpart KKK will construct one new affected facility per year.

<sup>3</sup> Affected facilities with design capacities of less than two long tons per day of hydrogen sulfide (H<sub>2</sub>S) in the acid gas, expressed as sulfur, have no reporting requirements pursuant to subpart LLL. Three respondents have sources capacities below this threshold.

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 563 (all sources subject to subpart LLL and also subject to subpart KKK).

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

<b>Total Annual Responses</b>				
(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
Subpart KKK				
Notification of construction/reconstruction	57	1	n/a	57
Notification of modification	56	1	n/a	56
Notification of anticipated startup	113	1	n/a	113
Notification of actual startup	113	1	n/a	113
Notification of demonstration of continuous monitoring system	0	1	n/a	0
Notification of initial performance tests	0	1	n/a	0
Semiannual reports	563	2	n/a	1,126
Subpart LLL				
Notification of construction/reconstruction	1.5	1	n/a	1.5
Notification of anticipated startup	3	1	n/a	3
Notification of actual startup	3	1	n/a	3
Notification of initial performance test	3	1	n/a	3
Notification of CMS demonstration	3	1	n/a	3
CMS demonstration report	3	0.2	n/a	0.6
Semiannual report	82	2	n/a	164
			Total (rounded)	1,643

The number of total respondents is 563.

The number of Total Annual Responses is 1,643. 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 \$9,518,358. Details regarding these estimates may be found in Table 1: Annual Industry Burden, NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL), 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 \$9,518,358. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 hours per response.

The total annual capital/startup and O&M cost to the regulated entity are \$338,700.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 12,689 labor hours at a cost of \$501,916. See Table 2. Annual Agency Burden and Cost: NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL), below.

### **6(f) Reasons for Change in Burden**

There is no change in the labor hours in this ICR compared to the previous 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 not significant change to the overall labor hours.

There is however, an adjustment in the labor hour estimate. The previous ICR shows a total of 149,174 annual hours. This renewal ICR shows a total of 149,180 annual hours. The small labor hour increase of six hours was caused by a mathematical error in the previous ICR.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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-2007-0047. 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-2007-0047 and OMB Control Number 2060-0120 in any correspondence.

### **Part B of the Supporting Statement**

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





Subpart KKK	N/A							
Subpart LLL	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Subpart KKK	See 3B							
Subpart LLL								
Notification of construction/ reconstruction <sup>c</sup>	2	1	2	1.5	3	0.15	0.3	\$220
Notification of modification	N/A							
Notification of anticipated startup <sup>h</sup>	2	1	2	3	6	0.3	0.6	\$440
Notification of actual startup <sup>h</sup>	2	1	2	3	6	0.3	0.6	\$440
<sup>h</sup> Notification of initial performance test	2	1	2	3	6	0.3	0.6	\$440
Notification of CMS demonstration <sup>h</sup>	2	1	2	3	6	0.3	0.6	\$440
CMS demonstration	See 3B							
Semiannual report <sup>i</sup>	40	2	80	82	6,560	328	656	\$481,340
4. Recordkeeping requirements								
A. Read instructions								
Subpart KKK	See 4C							
Subpart LLL	See 3A							
B. Plan activities	See 3E							
Subpart KKK	See 4C							
Subpart LLL	N/A							
C. Implement activities	See 3E							
Subpart KKK								
Filing and maintaining records <sup>j</sup>	80	1	80	563	45,040	2,252	4,504	\$3,304,810
Startup, shutdown, or malfunction <sup>k</sup>	80	1	80	112	8,960	448	896	\$657,440
Recalibrate monitors	4	12	48	563	27,024	1,351.2	2,702.4	\$1,982,886
Method 21 performance evaluation	2	2	4	563	2,252	112.6	225.2	\$165,241
Subpart LLL	N/A							
D. Develop record system								
Subpart KKK	See 4C							
Subpart LLL <sup>l</sup>	40	1	40	3	120	6	12	\$8,805
E. Time to enter information								
Subpart KKK	See 4C							
Subpart LLL								
Records of startup, shutdown, or	1.5	12	18	3	54	2.7	5.4	\$3,962

malfunction								
Records of continuous recording	0.5	700	350	82	28,700	1,435	2,870	\$2,105,863
Records of capacity data	2	1	2	3	6	0.3	0.6	\$440
F. Train personnel								
Subpart KKK	See 4C							
Subpart LLL	N/A							
G. Audits								
Subpart KKK	N/A							
Subpart LLL	N/A							
Subtotal					129,722	6,486.15	12,972.2	\$9,518,358
TOTAL ANNUAL BURDEN AND COST (rounded)						149,180		\$9,518,358

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to subpart KKK will be 563 with one new source becoming subject to the rule over the three-year period of this ICR. It is also assumed that the average number of respondents that will be subject to subpart LLL will be 82 with one additional source becoming subject to the rule over the three-year period of this ICR.
- b. This ICR uses the following labor rates: \$95.32 per hour for Executive, Administrative, and Managerial labor; \$64.60 per hour for Technical labor, and \$40.09 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "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 one-half of new facilities are the result of construction or reconstruction, while the other half are the result of modifications of existing facilities.
- d. We have assumed that 20 percent of existing respondents will construct one new facility per year.
- e. We have assumed that no respondent is expected to use the alternative standards.
- f. We have assumed that while this subpart includes the option of using closed vent systems and control devices to demonstrate compliance, no respondent is expected to use this option. Therefore, no respondent is expected to submit the associated notifications and reports.
- g. We have assumed that each respondent will take 8 hours two times per year to write semiannual reports.
- h. We have assumed that each respondent will take two hours to complete reports.
- i. We have assumed that each respondent will take 40 hours two times per year to write semiannual reports.
- j. We have assumed that each respondent will take 80 hours to file and maintain records.
- k. We have assumed that 20 percent of respondents will take 80 hours to implement this activity.
- l. We have assumed that each respondent will take 40 hours to develop record system.

**Table 2: Average Annual EPA Burden – NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	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)
Subpart KKK								
Notification of construction/reconstruction <sup>c</sup>	2	1	2	56	112	5.6	11.2	\$5,095
Review notification of modification <sup>c</sup>	2	1	2	56	112	5.6	11.2	\$5,095
Review notification of anticipated startup <sup>d</sup>	2	1	2	112	224	11.2	22.4	\$10,189
Review notification of actual startup <sup>d</sup>	2	1	2	112	224	11.2	22.4	\$10,189
Notification of demonstration of CEMS	2	1	2	0	0	0	0	\$0
Review initial CEMS demonstration report	2	1	2	0	0	0	0	\$0
Review notification of performance test	2	1	2	0	0	0	0	\$0
Review results of performance test	2	1	2	0	0	0	0	\$0
Review semiannual reports <sup>e</sup>	8	2	16	563	9,008	450.4	900.8	\$409,756
Subpart LLL								
Review notification of construction/reconstruction <sup>f</sup>	2	1	2	1.5	3	0.15	0.3	\$137
Review notification of modification <sup>f</sup>	2	1	2	1.5	3	0.15	0.3	\$137
Review notification of anticipated startup <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$273
Review notification of actual startup <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$273
Review notification of demonstration of CEMS <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$273
Review of CEMS demonstration report <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$273
Review notification of initial performance test <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$273
Review of semiannual reports <sup>e</sup>	8	2	16	82	1,312	65.6	131.2	\$59,680
Review results of performance test	2	1	2	3	6	0.3	0.6	\$273
TOTAL ANNUAL BURDEN AND COST (rounded)						12,689		\$501,916

Assumptions:

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to subpart KKK will be 563 with one new source becoming subject to the rule over the three-year period of this ICR. It is also assumed that the average number of respondents that will be subject to subpart LLL will be 82 with one additional source becoming subject to the rule over the three-year period of this ICR.
- <sup>b</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$54.66 (GS-13, Step 5, \$34.16x1.6), Technical rate of \$40.56 (GS-12, Step 1, \$25.35 x 1.6), and Clerical rate of \$21.95 (GS-6, Step 3, \$13.72 x 1.6). These rates are from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.
- <sup>c</sup> We have assumed that one-half of new facilities are the result of construction or reconstruction, while the other half are the result of modifications of existing facilities.
- <sup>d</sup> We have assumed that 20 percent of respondents will each take two hours to review notifications.
- <sup>e</sup> We have assumed that it will take each respondent eight hours two time per year to review semiannual reports.
- <sup>f</sup> We have assumed that one-half of new respondents will review notification of construction/reconstruction and the other half will review notification of modification.
- <sup>g</sup> We have assumed that each of the new respondents will take two hour to review notification.