

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER
1736.05
EPA'S NATURAL GAS STAR PROGRAM**

January 15, 2008

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled "Reporting and Recordkeeping Requirements Under EPA's Natural Gas STAR Program," ICR number 1736.05, OMB Control No. 2060-0328.

1(b) Characterization of the Information Collection

Natural Gas STAR is a voluntary program sponsored by the U.S. Environmental Protection Agency (EPA) that encourages oil and natural gas companies to adopt cost effective methods for reducing methane emissions. The program works with oil and natural gas production, processing, storage, transmission, and distribution companies to remove barriers that inhibit the implementation of various emission reduction opportunities. The Program effectively advances the adoption of emission reduction technologies by working with Natural Gas Star Partners to evaluate a set of Best Management Practices (BMPs) and various Partner Reported Opportunities (PROs) in the context of their current business operations, and implement them where cost effective. Implementation of the program's BMPs and PROs save participants money, improves operational efficiency, and enhances the protection of the environment.

Participation in the program begins with the completion and submittal of a one-page Memorandum of Understanding (MOU) that outlines responsibilities of the Natural Gas STAR Partner and EPA. The MOU commits a Natural Gas STAR Partner to reviewing its activities that result in methane emissions and consider a set of options that reduce emissions, increase profits and competitiveness, and maintain or enhance gas delivery service. In addition, Partners agree to implement BMPs and PROs that pertain to the Partner's operations (production, transmission, processing, storage, and/or distribution). Partners also agree that the BMPs and PROs are generally cost effective for the industry, but favorable economics are dependent upon site specific factors.

Natural Gas STAR Partners also agree to submit an Implementation Plan within six to twelve months of signing the MOU. In subsequent years, Partners must complete and submit an Annual Report that documents the implementation of BMPs and PROs and associated methane emission reduction accomplishments. In return for their participation, Partners are allowed to advertise their membership and involvement in the program. EPA helps Partners with their communication efforts and also provides program implementation assistance by analyzing emerging technologies and conducting workshops and training courses. This voluntary agreement can be terminated by the Natural Gas STAR Partner or EPA with no notice or penalties.

1(c) Terms of Clearance of the Information Collection

When this collection was approved in 2004, OMB asked EPA to evaluate the extent to which the partners would have reduced their emissions in the absence of the program, and that EPA should not use these data to estimate aggregate emission reductions across the industry resulting from the Natural Gas STAR Program. In regard to the latter issue, EPA agrees with OMB and does not use the data in this manner.

The extent to which partners would have reduced their emissions in the absence of the Program is a challenging question, but one that EPA takes very seriously. As is described later in this Supporting Statement, Partners of the Natural Gas STAR Program are asked to

submit Implementation Plans every three years describing the emissions reduction practices they plan to evaluate and implement. Partners are then asked to submit annual progress reports detailing emission reduction activities undertaken during the previous calendar year. The Natural Gas STAR Program asks that partners only include in their reports practices that were undertaken voluntarily; i.e. not to include reductions attributable to compliance with existing regulations.

The emission reductions reported by Partners include reductions associated with the implementation of traditional program Best Management Practices (BMPs) and reductions achieved through the adoption of Partner Reported Opportunities (PROs). PROs are activities identified by Natural Gas STAR Partners, beyond the original BMPs, that result in methane emissions reductions. It is worthwhile to note that for 2006, 61% of reductions reported to Natural Gas STAR were due to these Partner identified emissions reduction activities. A significant portion of Natural Gas STAR's efforts in recent years has been devoted to promoting these PROs through technical document development and hosting of specialized technology transfer workshops.

Emission reduction data submitted to EPA are used to measure the effectiveness of the Natural Gas STAR Program. EPA, however, does not attribute all of these emissions reductions to Natural Gas STAR. In particular, emission reduction data for Transmission and Distribution BMP 2, Pipeline Replacement, is largely considered regulatory driven and is not included when calculating program accomplishments. In addition, for each annual report, a quality assurance/quality control check is performed on all data. Unrealistic emissions reduction claims and any errors or inconsistencies are identified and resolved through direct correspondence with the appropriate company (ies). If necessary, these data are omitted or adjusted prior to their inclusion in the accounting of Natural Gas STAR Program accomplishments.

In an effort to ensure that these data accurately reflect the impact of the Program, EPA has performed a scenario analysis. As shown in Figure 1, a business as usual scenario was developed that displays projected methane emissions in the absence of the Natural Gas STAR Program. This emission scenario is calculated by multiplying emission factors by projected levels of production, processing and transmission/distribution as reported in the Energy Information Agency's American Energy Outlook (AEO 2002). The emission factors are assumed to decline 5% over 25 years to reflect increased efficiencies in the natural gas system.

In the same figure, an alternative emissions scenario is constructed that assumes all cost-effective mitigation options are implemented over the time period. Cost-effective mitigation options are defined as those options where the project generates a positive internal rate of return. While these options are cost effective, they are not implemented in the no-action scenario because of information, policy and other non-cost barriers. The difference between this emission scenario and the no-action scenario represents the total potential emission reduction that would reasonably be achieved by the Natural Gas STAR Program if all barriers to implementation were removed.

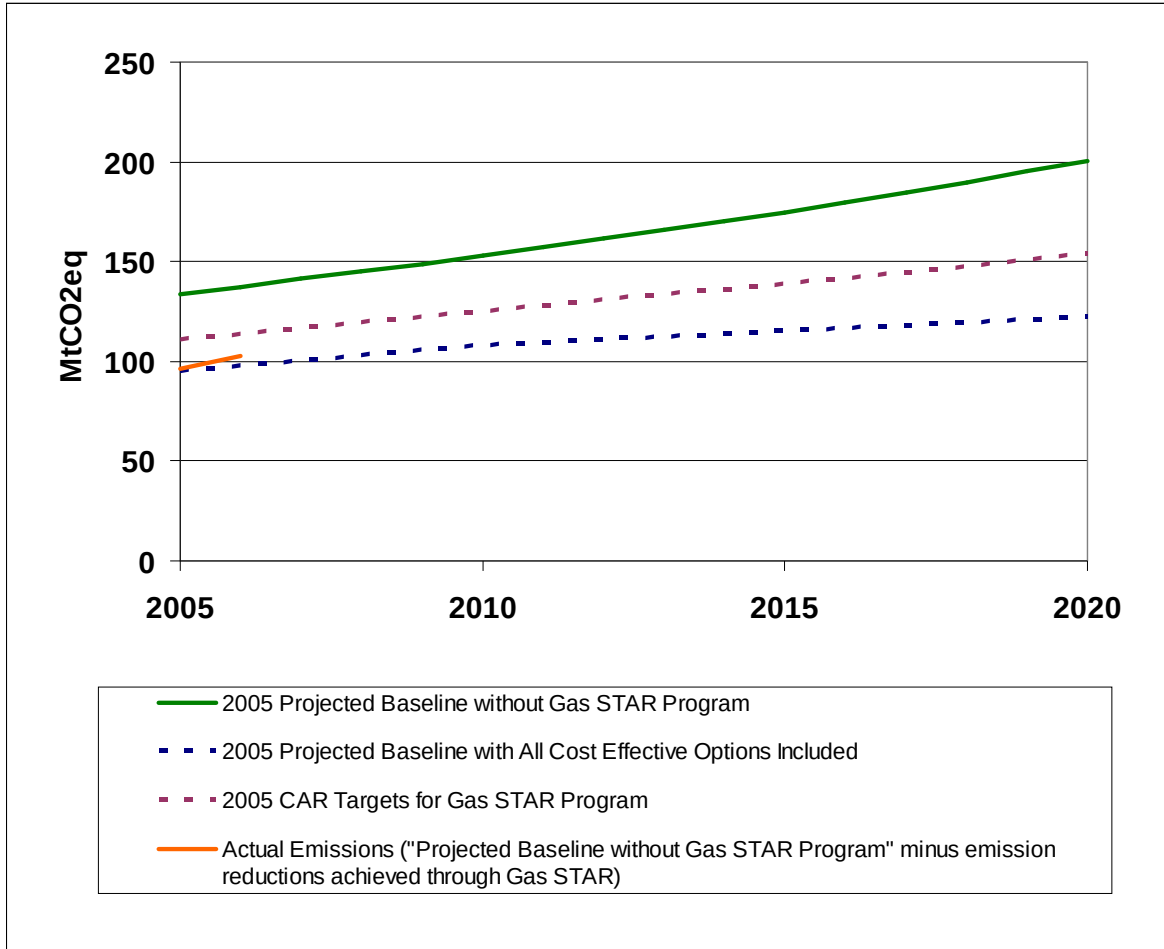
In support of the President's national greenhouse gas intensity target, EPA used the emission projections with and without cost-effective reductions implemented and past experience with supporting the natural gas industry to set program reduction targets for the Natural Gas STAR Program (as illustrated by the red dotted line and reported in the Climate Action Report (CAR)). As illustrated by the orange line, the Natural Gas STAR Program is tracking well against these emission reduction targets.

Using this analysis as a guide, EPA is able to estimate the extent to which regulatory, information, and other barriers that often inhibit the implementation of these activities can be overcome by the Natural Gas STAR Program. The Program overcomes these barriers through a variety of activities including:

- Development of technical fact sheets, reports and articles
- Hosting technology transfer workshops
- Providing analytical support to Partner companies
- Supporting research activities
- Publicizing achievements of Partner companies
- Providing a mechanism for recording and storing information about emission reduction activities

In addition to benefiting Partner companies who report these reductions, these activities benefit non-Partner companies who are not reporting to the Program. For example, all the technical documents developed by the Program are made available to the public on the Natural Gas STAR website, and workshop attendance is not restricted to Program Partners. Thus, it can be assumed that a substantial portion of the natural gas industry that is not participating in the Natural Gas STAR Program is also implementing some of the emission reduction activities that are encouraged by the Program. As noted above, Natural Gas STAR does not attempt to estimate the accomplishments of these companies, even though their activities are at least partially due to the existence of the Natural Gas STAR Program.

***Figure 1: Natural Gas Industry Methane Emission Projections**



***Notes and Data Sources:**

- Projected emissions without Gas STAR are from the *Global Anthropogenic Non-CO2 Greenhouse Gas Emissions: 1990-2020*, EPA 430-R-06-003. Projected emissions with cost effective options included are from the *Global Mitigation of Non-CO2 Greenhouse Gases*, EPA 430-R-06-005.
- Program reductions are based on expert judgment and were used to measure the GHG intensity of the U.S. economy in the *U.S. Climate Action Report - 2006*, Department of State, Chapters 4-5.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

EPA has developed this ICR to obtain authorization to collect information from Natural Gas STAR Partners. EPA needs to collect initial information in the one-page MOU to formally establish participation in the Natural Gas STAR Program and to obtain general information on new Natural Gas STAR Partners. EPA uses information obtained in the MOU to identify and initiate communication with the Partner's Natural Gas STAR Implementation Manager and Media Liaison.

By agreeing to participate in the Natural Gas STAR Program, the Partner commits to completing and submitting an Implementation Plan and an Annual Report. The Implementation Plan and Annual Report are necessary to evaluate a Partner's progress and performance, and assess overall program results. The information provided in these communications also allows EPA to identify the equipment, systems, maintenance methods, and implementation methods most commonly utilized, and to provide technical and other assistance to Partners in completing and enhancing their planned implementation of BMPs and PROs.

2(b) Practical Utility/Users of the Data

EPA uses information submitted in the MOU to update its database/tracking system containing information on current and potential Natural Gas STAR Partners. The database serves as a source of general information and a mailing list for both Partners and non-partner companies. EPA uses information submitted in the Implementation Plan and Annual Report to document the progress of companies and organizations in implementing the program and reducing methane emissions. EPA enters annual report information received from Partners into the tracking system. EPA also aggregates these data and prepares various progress reports. With Partner permission, EPA uses these data to develop technical publications on specific economic emission reduction practices and case studies of successful implementation experiences. These documents serve to demonstrate to current and potential Partners the cost savings that can be realized through various equipment upgrades and maintenance activities, and to provide technical and implementation assistance.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information to be obtained under this ICR has not been collected by EPA or any other Federal agency.

3(b) Consultations

Since the last ICR Renewal, all of the information collection procedures for Natural Gas STAR have remained in a similar format. EPA contacted the following people and received no objections to this information request.

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3(c) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on November 1, 2007 (72 FR 61875). No comments were received in response to the notice.

3(d) Effects of Less Frequent Collection

The development of an MOU is a one-time information submittal from companies that voluntarily choose to become Partners in the Natural Gas STAR Program. Partners must also prepare and submit an Implementation Plan, and revise the plan every three years. Partners must also submit an Annual Report while participating in the program. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program.

3(e) General Guidelines

None of these reporting or record keeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

3(f) Confidentiality

Participation in the Natural Gas STAR Program is voluntary. Natural Gas STAR Partners may designate information submitted under this ICR as confidential business information. EPA will treat all such information as confidential business information and will not make the company or agency-specific information collected under this ICR available to the general public.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the MOU, Implementation Plan, or the Annual Report.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The following is a list of North American Industry Classification System (NAICS) codes and associated industries that may be affected by information collection requirements covered under this ICR:

211111	Crude Petroleum and Natural Gas Extraction
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48621 Pipeline Transportation of Natural Gas
22121 Natural Gas Distribution

4(b) Information Requested

EPA's Natural Gas STAR Program specifies requirements for Partners. All Natural Gas STAR Partners must develop and submit a one-page Memorandum of Understanding (MOU) with the Agency upon agreeing to participate in the program. Partners also must complete and submit to EPA a Natural Gas STAR Program Implementation Plan within six months of signing the MOU. The Implementation Plan is an outline of what will happen over the next three years, and serves as a plan for the Partner to follow. Partners also submit an Annual Report to the Agency. The Annual Report documents what has been accomplished in the past year, using the Implementation Plan as a guideline for comparison.

Memorandum of Understanding

Natural Gas STAR Partners are required to sign and submit to EPA the one-page MOU that describes the terms of participation in the program.

(i) Data items:

Partners must provide the following information in the MOU:

- The name, title, address, telephone and facsimile number, and e-mail address of a Natural Gas STAR Program Implementation Manager and a Media Liaison;
- The name and signature of the Partners' Authorized Company Representative;
- A camera-ready version of the Partner's logo, or other emblem;

(ii) Respondent activities:

In developing the MOU, Partners must perform the following activities:

- Receive and review the one-page MOU;
- Gather information and fill out the MOU; and
- Sign the MOU and submit it to EPA.

Implementation Plan

Partners must complete and submit a Natural Gas STAR Implementation Plan within six to twelve months of signing the MOU.

(i) Data items:

The Implementation Plan form requests the following information:

- General company information (e.g., company name and contact, position, address, telephone and facsimile numbers, etc.);
- An Implementation Plan Summary;

- Information on applicable Best Management Practices, which are reported by BMP type:

Directed Inspection and Maintenance at Gate Stations and Surface Facilities;
 Identification and Rehabilitation of Leaky Distribution Pipe;
 Directed Inspection and Maintenance programs at Compressor Stations;
 Use of Turbines at Compressor Stations;
 Identification and Replacement of High Bleed Pneumatic Devices;
 Installation of Flash Tank Separators on Glycol Dehydrators;
 Replace Gas Pneumatics with Instrument Air Systems; and
 Implement Directed Inspection and Maintenance at Gas Plants and Booster

Stations.

- Information on applicable Partner Reported Opportunities that the company chooses to evaluate and implement; and
- Inventory of past methane emission reductions.

(ii) Respondent activities:

- Partners must conduct the following activities in preparing the Implementation Plan:
- Review the instructions;
- Gather the requested information and develop the Implementation Plan;
- Complete the form(s);
- Sign and submit the plan to EPA; and
- Update the plan, if necessary.

Annual Report

Partners must complete and submit a Natural Gas STAR Annual Report while participating in the program.

(i) Data items:

The Annual Report form requests the following information:

- General company information (e.g., company name and contact, position, address, period covered by report, telephone and facsimile numbers, etc.);
- An Annual Report Summary;
- Information on Emission Reduction Technologies & Practices or Best Management Practices executed, which are reported by the following BMP type:

Directed Inspection and Maintenance at Gate Stations and Surface Facilities;

Identification and Rehabilitation of Leaky Distribution Pipe;
Directed Inspection and Maintenance programs at Compressor Stations;
Use of Turbines at Compressor Stations for New Installations or When Retiring Reciprocating Engines;
Identification and Replacement of High Bleed Pneumatic Devices;
Installation of Flash Tank Separators on Glycol Dehydrators;
Replace Gas Pneumatics with Instrument Air Systems; and
Implement Directed Inspection and Maintenance at Gas Plants and Booster Stations.

- Information on applicable Partner Reported Opportunities that the company implemented; and
- Information on Additional Program Accomplishments.

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Annual Report:

- Review the instructions;
- Gather the requested information for the initial report;
- Complete the initial form(s);
- Sign and date the initial report;
- Submit the initial report to EPA; and
- Prepare and submit a subsequent Annual Report.

Additional Activities

During participation in the program, Partners may be required to notify EPA within two weeks of any change in Natural Gas STAR Program Implementation Manager responsibility.

(i) Data items:

Partner must provide EPA with the name of the new Implementation Manager.

(ii) Respondent activities:

Notify EPA within two weeks of any change in Natural Gas STAR Implementation Manager responsibility.

5. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The Natural Gas STAR Program requires EPA to perform activities after a Partner submits the MOU, Implementation Plan, and Annual Report.

Memorandum of Understanding

EPA must perform the following activities following the submittal of an MOU:

- Review the MOU to ensure completeness and accuracy, and follow up, if necessary;
- Sign the MOU;
- Develop a cover letter;
- Copy the cover letters and MOUs;
- Send cover letter and original MOU back to Partner;
- File copies of cover letters and MOUs; and
- Enter MOU information into a tracking database.

Implementation Plan

EPA must perform the following activities after the submittal of an Implementation Plan:

- Review the plan to ensure completeness and accuracy, and follow-up, if necessary;
- Make copies of the plan;
- File copies of the plan; and
- Enter information into a tracking database.

Annual Report

EPA must perform the following activities after the submittal of an Annual report:

- Review the report to ensure completeness and accuracy, and follow-up, if necessary;
- Make copies of the report;
- File copies of the report; and
- Enter information into an emissions reduction data management database.

Additional Activities

EPA also may be required to perform the following additional activity:

Enter any changes in Partner's information into a database (e.g., Implementation Manager's responsibility, newsletter mailing list, etc.).

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a state-of-the-art telephone system, personal computers, and applicable database and word processing software. In addition to traditional hard copy data collection methods, all information can be submitted to EPA electronically. EPA has created the capability for companies to submit Annual Reports through a password protected website or by e-mailing an electronic reporting form.

EPA ensures the accuracy and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the MOU, Implementation Plan, and Annual Reports into a database and aggregates data obtained from the Implementation Plan and Annual Reports to track the progress of Partners in reducing methane emissions.

5(c) Small Entity Flexibility

EPA reviewed available company Web sites for Partner organizations that were believed to be small entities. Upon completion of the review, EPA estimated that one Natural Gas STAR Partner is a small entity. EPA has designed its plan and electronic reporting forms to minimize respondent burden while obtaining sufficient and accurate information. In addition, the burden associated with the Natural Gas STAR Program is inherently reduced since the initial agreement to participate is voluntary.

5(d) Collection Schedule

EPA collects initial information in the one-page MOU, which is completed and submitted by each Partner upon agreement to participate in the program. EPA collects information in the Implementation Plan six to twelve months after receiving a signed MOU. Each spring, EPA collects information in the Annual Report to monitor emission reduction progress. Finally, EPA may collect other program information on a periodic basis or as the information is submitted; these items include notification of changes in Implementation Manager responsibility, and notification of changes in a Partner's gas system.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Exhibit 1 presents the estimated annual respondent burden and costs for information collection activities associated with the Natural Gas STAR Program.

6(b) Estimating Respondent Costs

EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$141.69 for legal staff, \$117.56 for managerial staff, \$89.01 for technical staff, and \$44.78 for clerical staff. Legal, managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Pipeline Transportation of Natural Gas (NAICS code 486200), Natural Gas Distribution (NAICS code 221200), and Oil and Gas Extraction (NAICS code 211100). The labor rates used were calculated by averaging labor

rates for the three NAICS codes. Legal rates were based on lawyers, management wages were based on environmental managers, technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants for May 2006. A June 2007 labor rate for all rates was estimated by applying a 3.5% growth factor from the employment cost index to account for increases in wages from June 2006 to June 2007. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at: <http://www.bls.gov/news.release/eci.t02.htm>

To develop respondent capital and O & M cost estimates, EPA consulted with members of the oil and gas industry. EPA believes that the capital or operations and maintenance costs of this program are not significant. The only O & M costs expected are for postage. A postage cost of \$3.00 is attributed to all activities involving the sending of materials to account for the use of trackable mail.

6(c) Estimating Agency Burden and Costs

Exhibit 2 presents the estimated Agency burden hours and costs for the information collection activities associated with this ICR. EPA estimates an average hourly labor cost (labor plus overhead) of \$71.34 for legal staff, \$66.72 for managerial staff, \$48.91 for technical staff, and \$19.65 for clerical staff. To derive these estimates, EPA used the "Hourly Salary Table 2007 - GS" from the Department of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

- | | |
|--------------------|---------------|
| – Legal Staff | GS-15, Step 1 |
| – Managerial Staff | GS-14, Step 4 |
| – Technical Staff | GS-12, Step 5 |
| – Clerical Staff | GS-5, Step 1. |

To derive the loaded hourly estimates, EPA multiplied hourly rates by the standard government overhead factor of 1.6.

**EXHIBIT 1
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST**

	Hours and Costs Per Respondent/Activity								Total Hours and Costs		
	Leg. \$141.6 9	Mgr. \$117.56	Tech. \$89.01	Cler. \$44.7 8	Respo n. Hours/ Activit y	Labor Cost/ Activit y	Capital/ Startup Cost	O & M Cost	Respon. or Activitie s	Total Hours/ Year	Total Cost/ Year
	Hour	Hour	Hour	Hour							
INFORMATION COLLECTION ACTIVITY¹											
Memorandum of Understanding											
Receive and review the MOU	1.00	8.00	0.00	0.00	9.00	\$1,082	\$0	\$0	9	81	\$9,738
Gather information and fill out MOU data sheet	1.00	25.00	0.00	2.00	28.00	\$3,170	\$0	\$0	9	252	\$28,530
Sign and submit MOU to EPA	0.00	0.50	0.00	0.50	1.00	\$81	\$0	\$3	9	9	\$756
SUBTOTAL										342	\$39,024
Implementation Plan											
Review instructions	0.00	2.00	0.00	0.00	2.00	\$235	\$0	\$0	9	18	\$2,115
Gather information and develop the Implementation Plan	0.00	10.00	10.00	0.00	20.00	\$2,066	\$0	\$0	9	180	\$18,594
Complete the form(s)	0.00	1.00	0.00	1.00	2.00	\$162	\$0	\$0	9	18	\$1,458
Sign and submit plan to EPA	0.00	0.50	0.00	0.50	1.00	\$81	\$0	\$3	9	9	\$756
Update Implementation Plan, as necessary and Submit to EPA	0.00	6.50	4.00	1.50	12.00	\$1,187	\$0	\$3	44	528	\$52,360
SUBTOTAL										753	\$75,283
Annual Report											
Review instructions	0.00	7.00	0.00	0.00	7.00	\$823	\$0	\$0	9	63	\$7,407
Gather the requested information for the initial report	0.00	10.00	37.00	0.00	47.00	\$4,469	\$0	\$0	9	423	\$40,221
Complete the initial form(s)	0.00	4.00	0.00	1.00	5.00	\$515	\$0	\$0	9	45	\$4,635
Sign and submit the initial report to EPA	0.00	0.50	0.00	0.50	1.00	\$81	\$0	\$3	9	9	\$756
Prepare and submit a subsequent Annual Report	0.00	9.03	16.70	1.35	27.08	\$2,608	\$0	\$3	146	3,953	\$381,206
SUBTOTAL										4,493	\$434,225
Additional Activities											
Notify EPA within two weeks of any change in Natural Gas Star Implementation Manager responsibility	0.00	1.00	0.00	0.50	1.50	\$140	\$0	\$3	15	23	\$2,145
SUBTOTAL										23	\$2,145
TOTAL										5,610	\$550,677

1 Since the last ICR renewal, EPA has removed the burden for requesting and mailing EPA Developed Materials for Natural Gas Star. All of these materials are now available on the

Natural Gas STAR Web site, and thus this burden is no longer relevant.

EXHIBIT 2 ESTIMATED ANNUAL AGENCY BURDEN AND COST	Hours and Costs Per Respondent/Activity								Total Hours and Costs		
	Leg.	Mgr.	Tech.	Cler.	Respo n.	Labor	Capital/		Number of		
	\$71.34	\$66.72	\$48.91	\$19.65	Hours/ Activit y	Cost/ Activit y	Startup Cost	O & M Cost	Respon. or Activitie s	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY₁	Hour	Hour	Hour	Hour							
Memorandum of Understanding											
Review MOU and follow up, if necessary	0.00	0.00	1.00	0.00	1.00	\$49	\$0	\$0	9	9	\$440
Sign the MOU	0.00	0.05	0.00	0.00	0.05	\$3	\$0	\$0	9	0	\$30
Develop a cover letter	0.00	0.00	0.00	0.10	0.10	\$2	\$0	\$0	9	1	\$18
Copy cover letters and MOUs	0.00	0.00	0.00	0.08	0.08	\$2	\$0	\$0	9	1	\$14
Send cover letters and original MOU back to partner	0.00	0.00	0.00	0.10	0.10	\$2	\$0	\$3	9	1	\$45
File copies of cover letters and MOUs	0.00	0.00	0.00	0.10	0.10	\$2	\$0	\$0	9	1	\$18
Enter MOU information into a data base	0.00	0.00	0.00	0.25	0.25	\$5	\$0	\$0	9	2	\$44
Subtotal										15	\$609
Implementation Plan											
Review plan and follow up, if necessary	0.00	0.00	2.00	0.00	2.00	\$98	\$0	\$0	53	106	\$5,185
Make copies of plan	0.00	0.00	0.00	0.08	0.08	\$2	\$0	\$0	53	4	\$83
File copies of plan	0.00	0.00	0.00	0.10	0.10	\$2	\$0	\$0	53	5	\$104
Enter information into data base	0.00	0.00	0.00	0.25	0.25	\$5	\$0	\$0	53	13	\$260
Subtotal										129	\$5,632
Annual Report											
Review report and follow up, if necessary	0.00	0.00	4.00	0.00	4.00	\$196	\$0	\$0	155	620	\$30,325
Make copies of report	0.00	0.00	0.00	0.08	0.08	\$2	\$0	\$0	155	12	\$244
File copies of report	0.00	0.00	0.00	0.10	0.10	\$2	\$0	\$0	155	16	\$305
Enter information into data base	0.00	0.00	0.00	0.50	0.50	\$10	\$0	\$0	155	78	\$1,523
Subtotal										725	\$32,396
Additional Activities											
Enter updated information into data base	0.00	0.00	0.00	0.25	0.25	\$5	\$0	\$0	15	4	\$74
TOTAL										873	\$38,711

1 Since the last ICR renewal, EPA has removed the burden for requesting and mailing EPA Developed Materials for Natural Gas Star. All of these materials are now available on the Natural Gas STAR Web site, and thus this burden is no longer relevant.

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

Currently, there are 137 Natural Gas STAR Program Partners. Based on recent partner activity, EPA anticipates that an average of nine new Partners will join the program annually. The majority of Natural Gas STAR Partners are currently large companies and EPA believes that many of the major relevant companies have already joined the program. The number of new Partners, however, remains constant because of more international companies and smaller independent companies joining the program. The average annual cost and burden estimates during the next 3-year ICR period are based on the average number of Partners as shown in Table 1.

TABLE 1
Estimated Number of Program Partners in Calendar Years 2008-2010

Type of Partner	2008	2009	2010	Average
New Partners Enrolled	9	9	9	9
Total Program Partners	137	146	155	146

Memorandum of Understanding

Each potential Partner must complete and submit a one-page MOU to participate in the program. EPA expects that nine new Partners will complete and submit an MOU each year.

Implementation Plan

Each new Partner must complete and submit the Implementation Plan within six to twelve months of signing and submitting the MOU. Additionally, EPA estimates that 30 percent of all existing Partners (44 facilities) will update the Implementation Plan and submit it to EPA each year.

Annual Report

All existing Partners must complete and submit an Annual Report. EPA estimates that completing the initial Annual Report will take approximately twice as long as subsequent reports. EPA expects that the nine new Program Partners joining each year will complete and submit an initial report and an average of 146 existing Partners (as shown in table 1) will complete and submit subsequent reports.

Additional Activities

EPA expects that some additional information submittals may be required of some Partners. EPA estimates that approximately 10 percent of all Partners experience changes

in their Implementation Manager responsibilities each year. Thus, EPA estimates that an average of 15 Partners (146×0.1) will notify EPA of changes in Implementation Manager responsibilities.

6(e) Bottom Line Burden Hours and Costs

Exhibits 1 and 2 show the aggregate annual burden and cost to respondents and the government, respectively, for the information collection activities covered under this ICR. The bottom line burden for respondents is approximately 5,610 hours per year with an annual cost of approximately \$550,677, which includes \$696 in O&M costs. The annual bottom line burden to the Agency is approximately 873 hours, at a cost of approximately \$38,711 per year. Over the three-year period covered by this ICR, EPA estimates the burden of the program to be 16,831 hours and \$1,652,031 for respondents, and 2,619 hours and \$116,133 for EPA.

6(f) Reasons for Change in Burden

The overall annual reporting burden for respondents has increased from 4,705 hours in the previous ICR to 5,610 hours in the current ICR as a result of an increase in the number of Partners in the Natural Gas STAR program. Despite this increase, the average burden per partner has decreased from 40.6 hours per Partner to 36.2 hours per Partner. This decrease can be attributed to a larger percentage of Partners using the on-line Annual Report forms, and the availability of new materials on the Natural Gas STAR Web-site. Fifty-eight percent of reporting partners used the on-line system in 2004 while 65% of reporting partners used the on-line system in 2007. Partners reported a subsequent decreased burden of 15% for this activity. The hourly burden estimates for data collection remained the same per Partner because the information requested and the collection methodology did not change.

Since the last ICR renewal, the overall annual cost increased from \$402,141 to \$550,677. This change is largely the result of higher hourly labor rates due to inflation and an increase in the number of program participants.

6(g) Burden Statement

The average per Partner reporting burden for information collection requirements associated with completing this ICR is estimated to be 24.2 hours.

For new Partners, the average per Partner reporting burden for information collection requirements associated with developing and completing the Implementation Plan is estimated to be 25 hours. The burden estimate includes time to receive and review the plan form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA. For existing Partners, the average per Partner reporting burden for information collection requirements associated with updating the Implementation Plan is estimated to be 12 hours. The burden estimate includes time to review, update (if necessary), complete, sign and submit the form to EPA.

The average per Partner reporting burden for information collection requirements associated with completing the initial Annual Report is estimated to be 60 hours. The average per Partner reporting burden for information collection requirements associated with completing subsequent Annual reports is estimated to be 27.1 hours. The burden estimate includes time to receive and review the report form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA. This

estimate includes a reduced estimate for those partners using the on-line reporting system, and a factor to account for the percentage of partners who are likely to use the on-line reporting system.

For Natural Gas STAR Partners, the average per Partner reporting burden for information collection requirements associated with additional activities is estimated to be 1.5 hours. The reporting burden includes time to notify EPA of changes in Natural Gas STAR Program Implementation Manager responsibility.

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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2004-0082, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Air and Radiation Docket is 202-566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2004-0082 and OMB Control Number 2060-0328 in any correspondence.