

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH) (Renewal),
EPA ICR Number 1789.06, OMB Control Number 2060-0418

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage, published at 40 CFR part 63, subpart HHH, were proposed on February 6, 1998 and promulgated on June 17, 1999. These regulations apply to existing facilities and new facilities that are major sources of hazardous air pollutants (HAP) and that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart HHH.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/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.

Approximately 19 respondents are currently subject to the reporting requirements of this regulation, and EPA estimates that an additional two reporting respondents per year will become subject to the regulation in the next three years. In addition, approximately 807 existing respondents are subject only to the recordkeeping requirements of this regulation. Overall, EPA estimates that approximately 826 respondents are subject to the regulation, and an additional 2 respondents per year will become subject to the regulation in the next three years. These estimates of the size of the regulated universe are based on information from the original ICR written when the NESHAP was promulgated and a search of EPA's Online Tracking Information

System (OTIS) database. EPA assumes that there is an average of one affected facility per plant (i.e., respondent). EPA estimates that the annual cost of this information collection will be \$0 for non-labor and \$61,085 for labor, based on a labor burden of 753 hours, for a total annual cost of \$61,085.

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 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. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/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 natural gas transmission and storage facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart HHH.

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 test, 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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart HHH.

3(a) Non-duplication

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 its 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

During the previous ICR renewal, EPA contacted the American Petroleum Institute (API), the American Gas Association (AGA), and the Interstate Natural Gas Association of America (INGAA) to determine whether it would be possible for the Agency to reduce the recordkeeping and reporting burden or improve the language in the standards to facilitate industry compliance. EPA also solicited information about the size, growth, and other characteristics of the regulated industry. API declined to provide comments on the NESHAP. EPA did not receive a response from AGA or INGAA. EPA also searched its OTIS database for information on the number of existing respondents.

To determine the size of the regulated universe EPA used information from the Federal Energy Regulatory Commission on the U.S. annual natural gas throughput for 2003 to estimate

the size of the source category.

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

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 and NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners/operators of natural gas transmission and storage facilities. The SIC codes for the respondents affected by the

standards are SIC (United States Standard Industrial Classification) 4922 and 4923, which correspond to NAICS (The North American Industry Classification System) 48621 and 22121, for Pipeline Transportation of Natural Gas and Natural Gas Distribution, respectively.

Standard	SIC Codes	NAICS Codes
40 CFR part 63, subpart HHH	4922	48621
40 CFR part 63, subpart HHH	4923	22121, 48621

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by the NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH).

A source must make the following reports:

Notification Reports	
Initial notification that a source is subject to the provisions in subpart HHH.	63.9(b)(2), 63.1274(a), 63.1285(b)(1) and (b) (2)
Notification of the date of a performance test.	63.7(b) and (c), 63.8(e)(2), 63.9(e), 63.9(g)(1), 63.1274(a), 63.1285(b)(3)
Notification of Compliance Status Report, including the results of any continuous monitoring system performance evaluations and inspection results.	63.9(h), 63.1270(d), 63.1274(a), 63.1283(c)(2)(ii)(A), 63.1285(b)(4), 63.1285(d)(1) through (d)(10)
Notification of change in compliance demonstration methods for control device performance (submit with Periodic Report).	63.1282(e)
Performance test results for closed-vent systems using flares as the control device (submit with Notification of Compliance Status Report).	63.7(g), 63.10(d)(2), 63.1274, 63.1282(d) (3), 63.1285(d)(2)

Notification Reports	
Design analysis documentation, including operating parameters and calculations, for closed-vent systems using control devices other than flares (submit with Notification of Compliance Status Report).	63.1274, 63.1282(d)(4), 63.1285(d)(4)(i) through (d)(4)(iii)
One complete test report for each test method used for a particular source (submit with Notification of Compliance Status Report).	63.1285(d)(3)
Analysis demonstrating whether an affected source is a major source (submit with Notification of Compliance Status Report).	63.1285(d)(8)
Statement of compliance with subpart HHH (submit with Notification of Compliance Status Report).	63.1285(d)(9)
Notification of any process change.	63.1285(f)
Application for approval of construction or reconstruction.	63.5(d)(1), 63.1274(a)
Notification of intent to construct or reconstruct.	63.9(b)(5)(i), 63.9(d)(4)(i), 63.1274(a)
Notification of actual date of startup.	63.9(b)(4)(v), 63.9(b)(5)(ii), 63.1274(a)
Results of performance evaluation.	63.8(e)(5), 63.10(e), 63.1274(a)
Notification of special compliance requirements.	63.9(d), 63.1274(a)

Reports	
Semiannual startup, shutdown, or malfunction reports (may be submitted with Periodic Report).	63.6(e)(3)(iv), 63.10(d)(5), 63.1274(a), 63.1285(b)(6)
Semiannual Periodic Reports.	63.10(e), 63.1274(a), 63.1285(e)
Report to demonstrate compliance with benzene emission limit (alternative standards) (submit with Notification of Compliance Status Report).	63.1285(d)(7)
Analysis that demonstrates conditions under which the facility reduces 95.0 percent of its HAP emissions (submit with Notification	63.1281(e)(2), 63.1285(d)(10)

Reports	
of Compliance Status Report).	
Semiannual excess emissions and continuous monitoring system performance report.	63.9(c)(8), 63.10(e)(3), 63.1274(a)
Semiannual HAP summary report.	63.10(e)(3)(vi), 63.1274(a)

A source must keep the following records:

Recordkeeping	
Records for each monitoring system including documentation of incidents such as breakdowns, repairs, calibration checks, startup, shutdown, malfunctions, and other down time.	63.10(b)(2), 63.10(c), 63.1272(d), 63.1274(a), 63.1283(d), 63.1284(b)(3)
Continuous records of equipment operating parameters and daily average values of the parameters.	63.1284(b)(4)(i) and (ii)
Records of the times and duration of all periods during which pilot flames are absent.	63.1284(b)(4)(ii), 63.1284(e)(3)
Records of flow indicator operation, detection, and vent stream diversions.	63.1284(b)(4)(iii)
Records of inspections of seals or closure mechanisms and records of broken or changed seals, valves, or locks.	63.1284(b)(4)(iv)
Continuous monitoring system quality control program.	63.8(d), 63.1274(a)
Startup, shutdown, and malfunction plan.	63.6(e)(3), 63.8(c)(1)(iii), 63.1272(d), 63.1274(a)
Records of control device activities, malfunctions, and down time.	63.1274, 63.1281(c)(3), 63.1283(d), 63.1284(b)(3) and (b)(4)
Records pertaining to the inspection of closed-vent systems including maintenance, leaks, repairs, delays, and shutdowns. This also applies to parts that are difficult or unsafe to inspect and those where a leak or	63.1283(c)(3) through (c)(7), 63.1284(b)(5)

Recordkeeping	
defect is detected.	through (8)
Records of glycol dehydration unit baseline operations, throughput quantity, and emissions information.	63.1281(e)(1) and (e)(2), 63.1284(b)(9) and (10), 63.1284(d)
Records of compliance with benzene emission limit (alternative standards).	63.1281(e)(2), 63.1284(c)
Throughput and emissions records of exempt glycol dehydration units.	63.1274(c) and (d), 63.1284(d)
Records of flare design and emissions.	63.1284(e)
Records of leak or defect detection, severity (maximum instrument reading), and date of repair.	63.1284(b)(7) and (b)(8)
Site-specific performance evaluation test plan.	63.7(c)(2), 63.8(d)(2), 63.8(e)(3)(i), 63.1274(a)
Record of results of performance test.	63.7(g)(3), 63.1274(a)

Electronic Reporting

At the present, respondents are using monitoring equipment that automatically records parameter data (e.g., temperature). Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, these electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate closed vent systems and CMS to: 1) achieve a 95% reduction in HAP, TOC, or total HAP, for control devices and vapor recovery devices; 2)

Respondent Activities
achieve a reduction to 20 ppm of TOC or total HAP, and operates at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius for combustion devices.
Perform initial performance test, using the procedures listed in 40 CFR 63.1282(d), and repeat performance tests if necessary.
Write the notifications 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.

The rule does not require use of information collection techniques such as automated, mechanical, or other technical collection techniques. Electronic submissions can be made but they must be followed up with a hard copy that is signed by the owner/operator of the facility.

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, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and serve as a record of 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 the AFS, which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS 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/operator for five years.

5(c) Small Entity Flexibility

There is a distribution of business sizes among the respondents. At the time of rulemaking, the Agency estimated that the number of affected small entities would likely be minimal due to several considerations in these rules that minimize the burden on all firms, both small and large.¹ These considerations include exempting from the control, monitoring, and reporting requirements of the NESHAP those glycol dehydration units below certain thresholds for natural gas throughput (less than 283 thousand standard cubic meters per day) or benzene emissions (less than 0.90 mega-gram per year). The Agency considers the remaining recordkeeping requirements the minimum 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. In the Economic Impact Analysis of the Oil and Natural Gas Production NESHAP Final Report², 49 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 49 percent of the average of 830 facilities affected by this ICR, or 407 facilities, are small entities.

5(d) Collection Schedule

¹ Preamble to Final Rule (see 64 FR 32626, June 17, 1999).

² Economic Impact Analysis of the Oil and Natural Gas Production NESHAP and the Natural Gas Transmission and Storage NESHAP, U.S. EPA, May 1999, EPA-452/R-99-003.

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

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. Specific tasks and major assumptions have been identified where appropriate. 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 753 hours (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

This ICR uses the following labor rates:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "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 standards are labor costs. There are no capital/startup or operations and maintenance (O&M) costs incurred as a result of this standard because the industry has primarily installed flares to control emissions. The only continuous monitoring required for a flare is the monitoring of the presence of the pilot flame, which is a requirement for proper operation of a flare under 40 CFR 63.11(b)(5).

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

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

The total capital/startup costs for this ICR are \$0.

The total operation and maintenance (O&M) costs for this ICR are \$0.

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 \$0.

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 \$5,035.

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

Managerial	\$56.02 (GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57 (GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50 (GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2005 General Schedule”, which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), 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 21 existing respondents will be subject to the standard. It is estimated that an additional two respondents per year will become subject. An additional 807 existing respondents keep records but do not submit reports. The overall average number of respondents, as shown in the table below, is 830 per year.

At the time of rulemaking, EPA estimated the source category consisted of 814 facilities, assuming one glycol dehydration unit per facility, and expected seven of these facilities would be subject to the NESHAP.^{3,4} EPA based these estimates on surveys from 114 glycol dehydration units at facilities in the source category, and on a US annual natural gas transmission throughput of approximately 31.31 trillion cubic feet (Tcf).^{5,6}

The US annual natural gas transmission throughput for 2003, the most recent year for which data are available, was approximately 31.79 Tcf, an increase of 1.5 percent since 1996 ($31.79 / 31.31 = 1.015$).⁷ Therefore, EPA estimates that the source category now consists of approximately 826 facilities ($814 \times 1.015 = 826$). Based on a search of EPA’s OTIS database using the MACT Prioritization Tool, EPA estimates there are currently 19 existing major sources that are subject to the NESHAP.⁸ EPA assumes as an upper bound that the other 807 existing

³ Background Information for Final Standards: Summary of Public Comments and Responses, U.S. EPA, May 1999, EPA-453/R-99-004b.

⁴ Original ICR supporting statement (<http://www.epa.gov/icr/icrs/icrpages/1789ss02.htm>).

⁵ Federal Energy Regulatory Commission (FERC) Form 2 - Major Natural Gas Pipeline Annual Report Historical Data (<http://www.ferc.gov/docs-filing/eforms/form-2/data/historical.asp>).

⁶ FERC Form 2A - Non-major Natural Gas Pipeline Annual Report Historical Data (<http://www.ferc.gov/docs-filing/eforms/form-2a/data/historical.asp>).

⁷ FERC Form 2/2A - Major and Non-major Natural Gas Pipeline Annual Report Data (<http://www.ferc.gov/docs-filing/eforms/form-2/data.asp>).

⁸ MACT Prioritization Tool (<http://www.epa.gov/idea/mact/>).

facilities in the source category are exempt facilities under 40 CFR 63.1270(f), which must maintain records of their applicability determination as required in 40 CFR 63.10(b)(3). Some of these 807 facilities may be area sources, which are not required to maintain records under the NESHAP. EPA does not have the data to quantify how many of these facilities are area sources, and therefore, assumes that all 807 are major sources exempt under 40 CFR 63.1270(f).

EPA's current estimate for the number of facilities in the source category is 12 facilities higher than the estimate at the time of rulemaking ($826 - 814 = 12$). Dividing by seven years ($2003 - 1996 = 7$), EPA estimates there are approximately two new facilities per year in the source category ($12 / 7 = 2$). Similarly, EPA's estimate of the number of subject facilities also increased by 12 facilities ($19 - 7 = 12$). Dividing by seven years ($2005 - 1998 = 7$), EPA estimates there are approximately two new subject facilities per year ($12 / 7 = 2$). Based on these estimates, both of the two new facilities per year in the source category are also subject to the NESHAP.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of 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)
1	2	19	807	0	828
2	2	21	807	0	830
3	2	23	807	0	832
Average	2	21	807	0	830

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 830.

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

Total Annual Responses				
(A) Information Collection	(B) Number of	(C) Number of	(D) Number of Existing Respondents That	(E) Total Annual Responses

Total Annual Responses				
Activity	Respondents	Responses	Keep Records But Do Not Submit Reports	E=(BxC)+D
Notification of intent to construct or reconstruct	2	1	N/A	2
Notification of actual date of startup	2	1	N/A	2
Notification of date of continuous monitoring system performance evaluation	2	1	N/A	2
Notification of planned date of performance test	2	1	N/A	2
Notification of Compliance Status Report	2	1	N/A	2
Semiannual Reports	21	2	N/A	42
			Total	52

The number of Total Annual Responses is 52.

The total annual labor costs are \$61,085. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 124 labor hours at a cost of \$5,034. See Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), 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 \$61,085. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and

Storage (40 CFR part 63, subpart HHH), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 124 labor hours at a cost of \$5,034. See Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

6(f) Reasons for Change in Burden

There is a decrease of four hours in burden from the most recently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 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-2008-0425. 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 contents of the 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 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 Ave., NW, 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) 566-1514. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0425 and OMB Control Number 2060-0418 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 Respondent Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Applications	Not applicable							
2. Survey and Studies	Not applicable							
3. Reporting Requirements								
a. Read instructions	2	1	2	21	42	2	4	3,899
b. Required activities	Not applicable							
c. Create information	Not applicable							
d. Gather existing information	4	1	4	21	84	4	8	7,798
e. Write reports								
i. Notification of construction/ reconstruction	2	1	2	2	4	0.2	0.4	371
ii. Notification of actual startup	2	1	2	2	4	0.2	0.4	371
iii. Notification of date of CMS performance evaluation	2	1	2	2	4	0.2	0.4	371
iv. Notification of planned date of performance test	2	1	2	2	4	0.2	0.4	371
v. Notification of Compliance Status Report	2	1	2	2	4	0.2	0.4	371
vi. Startup/ shutdown/ malfunction reports ²	2	2	4	21	84	4	8	7,798
vii. Semiannual Periodic Report	2	2	4	21	84	4	8	7,798
4. Recordkeeping Requirements								
a. Read instructions	See 3a							
b. Plan activities	4	1	4	2	8	0.4	0.8	743
c. Implement activities	Not applicable							
d. Develop record system								

Table 1. Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
i. Control equipment	4	1	4	2	8	0.4	0.8	743
ii. Startup/shutdown/malfunction plan	12	1	12	2	24	1	2	2,228
e. Enter information								
i. Control device design	4	1	4	2	8	0.4	0.8	743
ii. Control equipment testing	1	1	1	2	2	0.1	0.2	186
iii. Control equipment inspection	1	2	2	21	42	2	4	3,899
iv. Control equipment monitoring	1	2	2	21	42	2	4	3,899
v. Control device CMS	1	6	6	21	126	6	13	11,698
f. Train personnel	4	1	4	21	84	4	8	7,798
g. Perform audits	Not applicable							
h. Retain records of actual throughput (facilities exempt under 63.1270(f)) ³	Not applicable							
TOTAL LABOR BURDEN AND COST (rounded)					753			\$61,085

1. This cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x \$83.71) + (Management hours x \$97.46) + (Clerical hours x \$42.55)].

2. Startup/ shutdown/ malfunction reports may be included in the semiannual periodic reports.

3. Respondents are expected to maintain records of actual throughput as a standard business practice; therefore, there is no additional burden associated with these records under this rule.

**Table 2: Annual Agency Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Review reports								
a. Initial notification	2	1	2	2	4	0.2	0.4	186
b. Preconstruction review application	4	1	4	2	8	0.4	0.8	373
c. Performance test notification	2	1	2	2	4	0.2	0.4	186
d. Compliance status notification	4	1	4	2	8	0.4	0.8	373
e. Semiannual periodic reports ²	2	2	4	21	84	4	8	3,916
TOTAL LABOR BURDEN AND COST (rounded)					124			\$5,034

1. This cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x \$41.57) + (Management hours x \$56.02) + (Clerical hours x \$22.50)].

2. Startup/ shutdown/ malfunction reports may be included in the semiannual periodic reports.