

**PART A OF THE SUPPORTING STATEMENT**  
**STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES**  
**AS REVISED IN 2010**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

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

Additional Reporting and Recordkeeping Requirements for National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

**(b) Short Characterization**

This supporting statement addresses new information collection activities that would be imposed by the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR part 63, subpart ZZZZ, to be revised in 2010. These standards fulfill the requirements of section 112 of the Clean Air Act (CAA) as amended in 1990, which requires the EPA to promulgate standards for stationary RICE. The original NESHAP (69 FR 33474, June 15, 2004) applied only to stationary RICE greater than 500 horsepower (hp) located at a major source. EPA promulgated NESHAP for new and reconstructed stationary RICE that are located at area sources of HAP emissions and for new and reconstructed stationary RICE that have a site rating of less than or equal to 500 HP that are located at major sources of HAP emissions on January 18, 2008 (73 FR 3568). At that time, EPA did not promulgate a final decision for existing stationary RICE that are located at area sources of HAP emissions or for existing stationary RICE that have a site rating of less than or equal to 500 HP that are located at major sources of HAP emissions. Today's final rule initiates a separate rulemaking process that focuses on existing stationary compression ignition (CI)

engines. This information collection request (ICR) addresses only the costs associated with these sources.

The information collection activities in this ICR include: initial performance testing for certain engines, one-time notifications and periodic reports, recording information, monitoring and the maintenance of records. The information collection activities will enable the EPA to determine initial and continuous compliance with emission standards for the regulated pollutants.

## **2. NEED FOR AND USE OF THE COLLECTION**

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

The EPA is required under section 112 of the CAA to establish NESHAP that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions. Section 112(d) states:

Emissions standards promulgated under this subsection and applicable to new or existing sources of hazardous air pollutants shall require the maximum degree of reduction in emissions of the hazardous air pollutants subject to this section that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing sources in the category or subcategory to which such emission standard applies . . . .

Section 112(i) further states:

After the effective date of any emissions standard, limitation or regulation promulgated under this section and applicable to a source, no person may operate such source in violation of such standard, limitation or regulation . . . .

In addition, section 114(a)(1) states that:

. . . the Administrator may require any person who owns or operates any emission source or who is 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 or methods, (D) sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and (E) provide such other information, as he may reasonably require.

Certain reports are necessary to enable the Administrator to identify stationary RICE subject to the regulation and to determine if the standards are being achieved.

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

The information will be used by the EPA to identify sources subject to the standards and ensure that the emission standards are being met. Records and reports are necessary to enable the EPA to identify facilities that may not be in compliance with the standards. Based on reported information, EPA will decide which facilities should be inspected and what records or units should be inspected at the facilities. The records that facilities maintain will indicate to EPA whether facility personnel are operating and maintaining the equipment properly.

**3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

**(a) Nonduplication**

Duplication in the reporting of stationary CI RICE information is not anticipated. If the standard has not been delegated, the information is sent 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 regulation to implement the Federal regulation, 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 standard. Therefore, no duplication exists.

**(b) Public Notice Required Prior to ICR Submission to OMB**

A public notice of this collection will be provided in the final rule for the NESHAP.

**(c) Consultations**

In September 1996, the EPA chartered the Industrial Combustion Coordinated

Rulemaking (ICCR) advisory committee under the Federal Advisory Committee Act (FACA). The committee's objective was to develop recommendations for regulations for several combustion source categories under sections 112 and 129 of the CAA. The ICCR advisory committee, known as the Coordinating Committee, formed Source Work Groups for the various combustor types covered under the ICCR. One work group, the RICE Work Group, was formed to research issues related to stationary RICE. The RICE Work Group submitted recommendations, information, and data analysis results to the Coordinating Committee, which in turn considered them and submitted recommendations and information to the EPA. The Committee's recommendations were considered by the EPA in developing the original regulations for stationary RICE, as well as for the additional stationary CI RICE now being addressed.

More recently, EPA has met with the Engine Manufacturers Association (EMA), the Interstate Natural Gas Association of America (INGAA), the American Petroleum Institute (API), as well as other affected entities that will be subject to the new emission standards. Information and advice from these groups was considered when developing these additions to the NESHAP for existing stationary CI RICE. EPA has also gathered further information on existing engines and has considered comments it received on the original proposed rule, the advance notice of proposed rulemaking notice (73 FR 4136), and the intervening court decision in creating this proposed rulemaking. The public also had the opportunity to review and comment on the proposed NESHAP and the ICR during the specified comment period.

**(d) Effects of Less Frequent Data Collection**

The frequency of the data collection requirements was chosen by the EPA to provide reasonable assurance that a facility is in compliance with the standard. Less frequent collection

could result in long-term exceedances of the applicable emission standards.

**(e) General Guidelines**

With the exception of requiring records to be maintained for more than 3 years, none of the guidelines in CFR 1320.5 are being exceeded. This rule requires all records to be maintained for a period of 5 years, which is consistent with the General Provisions under 40 CFR part 63.

**(f) Confidentiality**

The type of data that would be required is principally emissions data and would not be confidential. If any information is submitted to the EPA for which a claim of confidentiality is made, the information would be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B -- Confidentiality of Business Information.

**(g) Sensitive Questions**

This section is not applicable because the ICR does not involve matters of a sensitive nature.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**(a) Respondents/NAICS Codes**

Respondents are owners or operators of existing stationary CI RICE that are less than or equal to 500 HP that are located at major sources of hazardous air pollutants (HAP), existing stationary CI RICE located at area sources of HAP emissions, and existing stationary non-emergency CI RICE that are greater than 500 HP that are located at major sources of HAP emissions. A major source of HAP emissions is a plant site that emits or has the potential to emit 10 tons or more per year of any single HAP or 25 tons or more per year of any combination of HAP. These standards affect any industry, State, local, or tribal government using stationary RICE as defined in the regulation. The North American Industrial Classification System

(NAICS) codes for facilities using stationary RICE affected by the regulation include: 2211 (Electric Power Generation, Transmission, or Distribution), 622110 (Medical and Surgical Hospitals), 48621 (Natural Gas Transmission), 211111 (Crude Petroleum and Natural Gas Production), 2111112 (Natural Gas Liquids Producers), and 92811 (National Security).

**(b) Information Requested**

- (i) Data Items: Attachment 1, Source Data and Information Requirements, summarizes the recordkeeping and reporting requirements of this regulation.
- (ii) Respondent Activities: The respondent activities required by the regulation are provided under the first column of Tables 1 through 3, introduced in section 6(a).
- (iii) Summary of Monitoring Requirements: The monitoring activities in this ICR include initial performance tests for demonstration compliance for non-emergency engines greater than or equal to 100 HP located at major sources and non-emergency engines greater than 300 HP located at area sources. It also includes recording hours of operation for stationary emergency engines. Engines that are greater than 500 HP are subject to subsequent performance testing every 3 years or 8,760 hours, whichever comes first, but are not included since the ICR only considers the first 3 years after the rule has become effective and subsequent performance testing for larger engines is expected to occur after those initial 3 years. Non-emergency engines greater than 500 HP that have add-on controls are required to use a continuous parametric monitoring system (CPMS) to monitor the catalyst inlet temperature and pressure drop across the catalyst to ensure those parameters do not exceed the operating limitations required by the final rule. The cost of purchasing and operating a CPMS was obtained from vendor quotes received for previous rulemaking and adjusted to 2008 dollars. The capital cost of a CPMS for a large engine facility is \$560. It is estimated that 30 hours per year is necessary to operate and maintain

the CPMS and that 6 hours per year (or 0.5 hours per month) is needed to record information from the CPMS. It is assumed that all engines subject to continuous monitoring would be located at large engine facilities. Engines that are less than 100 HP, stationary emergency RICE, and stationary RICE less than or equal to 300 HP that are located at area sources must comply with specific management practices described in the final rule. No ICR burden was attributed to the requirement of following the manufacturer's emission-related operation and maintenance requirements or the owner or operator's own maintenance plan. It is expected that the majority of owners and operators are already following some type of O&M requirements and no additional burden is expected in order to comply with this requirement.

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

### **(a) Agency Activities**

A list of Agency activities for the first 3 years following the effective date of the standard is provided in Tables 5 through 7, which are introduced in section 6(c).

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

Data obtained during periodic visits by EPA personnel, from records maintained by the respondents, and from information provided in semiannual reports will be tabulated and published for internal EPA use in compliance and enforcement programs. The final rule allows records to be retained in hard copy or electronic format to allow flexibility and minimize burden.

### **(c) Small Entity Flexibility**

Minimizing the information collection burden for all sizes of organizations is a continuing effort for the EPA. The additions to the NESHAP for existing stationary CI RICE

applies to engines less than or equal to 500 HP located at major sources, to all existing engines at area sources, and to existing stationary non-emergency CI RICE greater than 500 HP located at major sources.

To reduce the impact on small entities, EPA is finalizing minimal compliance requirements on owners and operators of smaller engines, i.e., those less than 100 HP, owners and operators of emergency engines, and owners and operators of engines less than or equal to 300 HP located at area sources. These engines must follow operation and maintenance requirements only and are not subject to performance testing. EPA believes that operation and maintenance requirements will ensure that the engine is in compliance. The cost of subjecting these engines to performance testing is not reasonable and would constitute a significant economic burden when compared to the cost of the unit itself. EPA expects that a large number of smaller engines will be subject to the rule and therefore believes the reduced compliance requirements will assist in reducing the burden on and providing flexibility for small entities. Further, only engines greater than 500 HP will be subject to continuous monitoring and additional performance testing. Thus, small entities will be required to conduct fewer performance tests than large sources, reducing the impact on small sources. Furthermore, EPA is requiring less reporting requirements on smaller sources, but at the same time requiring a level of reporting that would be needed to ensure compliance and, therefore, additional reducing the impact on small businesses.

**(d) Collection Schedule**

Existing sources must submit an initial notification that the source is subject to the standard within 120 days after the source becomes subject to the relevant standard. Sources who are required to conduct a performance test must submit a notification 60 days prior to each

performance test. Sources who must conduct performance testing to demonstrate initial compliance must submit an initial notification of compliance within 180 days after completion of the initial compliance demonstration. Sources whose initial compliance demonstration does not include performance testing must submit an initial notification of compliance within 30 days of the initial compliance demonstration. All facilities must submit to the EPA a semiannual compliance report that includes any exceedances and malfunctions.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

### **(a) Estimating Respondent Burden**

It is estimated that 825,545 engines will be subject to recordkeeping and reporting requirements under the final rule each year over the next 3 years after the rule has become effective. Sources must perform initial performance tests for non-emergency CI engines that are greater than 100 HP located at major sources and for non-emergency CI engines that are greater than 300 HP located at area sources. Sources with non-emergency CI engines greater than 500 HP that have controls are subject to continuous monitoring requirements. Sources must also conduct additional performance tests on non-emergency CI engines that are greater than 500 HP that are not limited use engines every 3 years or 8,760 hours, whichever comes first. Sources with non-emergency limited use CI RICE that are greater than 500 HP must test every 8,760 hours of operation or 5 years, whichever comes first. However, as noted previously, this ICR does not include those activities.

An itemized breakdown of the reporting and recordkeeping requirements with the annual cost and labor requirements for the respondents subject to the NESHAP for the 3-year period following the effective date of the rule is presented in Tables 1 through 3. The annual cost and

labor respondent burden estimates for the first year after promulgation are provided in Table 1.

The burden estimates for years 2 and 3 are presented in Tables 2 and 3, respectively. These numbers were derived from the EPA's experience with other standards.

**(b) Estimating Respondent Costs**

The information collection activities for sources subject to these requirements are presented in Tables 1 through 3. The total cost for each respondent activity includes labor costs and capital/startup costs.

(i) Estimating Labor Costs The total cost for each respondent activity includes labor costs. Labor rates, on a per-hour basis, are taken from the Bureau of Labor Statistics web site (<http://www.bls.gov/news.release/ecec.t02.htm>) as posted for 2008. The base labor rates are \$32.52 for technical/professional personnel, \$37.24 for management, and \$15.63 for clerical. The total compensation rate is \$46.06 for technical/professional personnel, \$53.90 for managerial, and \$22.72 for clerical. This accounts for paid leave, insurance, etc. The compensation rates were then adjusted by an overhead and profit rate of 167 percent. The final total wage rates are \$77 for technical/professional personnel, \$90 for management, and \$38 for clerical.

(ii) Estimating Capital/Startup Costs Capital costs associated with this NESHAP result from having to conduct performance testing with portable analyzers. Capital costs are based on consultation with equipment vendors and industry experts. The cost of conducting performance testing is based on the cost of portable analyzer testing and is \$1,165 per engine. Since in most cases only an initial performance test is required, it is expected that a testing firm will be conducting the performance test. The cost of testing is based on testing two engines at a facility in one day, therefore, costing \$582 per engine.

Owners and operators of emergency stationary engines are required to install a non-resettable hour meter to monitor the total number of hours operated. Information EPA has obtained indicates that an hour meter is typically included with the engine so no separate cost for the hour meter was estimated.

The cost of monitoring includes the purchase of a CPMS for non-emergency CI engines greater than 500 HP that have add-on controls to monitor the catalyst inlet temperature and pressure drop across the catalyst. The cost of purchasing a CPMS was obtained from vendor quotes and is \$560 in 2008 dollars for a large engine facility.

The total capital costs for each year are shown in Tables 1 through 3. The total capital cost over the three year period is estimated to be \$61,481,165 or an average of \$20,493,721 per year.

TABLE 1. RESPONDENT BURDEN AND COST OF REPORTING FOR THE FIRST YEAR

Burden Item	Person-hours occurrence	Number of occurrence s per year	Person-hours per Responden t	Respondent s per year	Technica l person-hours	Managemen t person-hours	Clerical person-hours	Capital/ Startup Cost**	O&M Cost**	Total Cost (\$ Year 1)
1. Applications	N/A									
2. Surveys and Studies	N/A									
3. Reporting Requirements										
A. Read Instructions	4	1	4	86,649	346,594	17,330	34,659			\$29,535,073
B. Required Activities										
-Initial Performance Test	N/A	1		86,649				582		\$50,453,924
C. Gather Existing Information	Included in 3D									
D. Write Report										
-Notification of construction/ reconstruction										
-Notification of anticipated startup										
-Notification of actual startup										
-Notification of performance test	2	1	2	86,649	173,297	8,665	17,330			\$14,767,536
-Initial notification of compliance	2	1	2	86,649	173,297	8,665	17,330			\$14,767,536
-Semiannual compliance report	1	2	2	60,654	121,308	6,065	12,131			\$10,337,276
-Annual compliance report	1	1	1	25,995	25,995	1,300	2,599			\$2,215,130
4. Recordkeeping Requirements	Included in 3A									
A. Read Instructions										
B. Train personnel		4	1	86,649	346,594	17,330	34,659			\$29,535,073
C. Continuous monitoring										
-Follow Manufacturer's Instructions	None									
-Purchase and install CPM										
-pressure and temp. (large RICE)	30	1	30	19,678	590,338	29,517	59,034	560		\$61,332,947
-record information	0.5	12	6	19,678	118,068	5,903	11,807			\$10,061,141
-Record information (hrs of operation)	1	1	1	738,896	738,896	36,945	73,890			\$62,965,110
<b>SUBTOTAL BURDEN AND COST</b>				<b>825,545</b>	<b>2,634,38</b>	<b>131,719</b>	<b>263,43</b>	<b>61,481,165</b>	<b>7</b>	<b>\$285,970,74</b>
<b>AVERAGE PER RESPONDENT</b>					<b>8</b>	<b>3</b>	<b>0.16</b>	<b>0.32</b>	<b>355</b>	<b>346</b>

\*Costs are based on December 2008 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$77, management at \$90 and clerical at \$38.

\*\*Costs per Respondent.

TABLE 2. RESPONDENT BURDEN AND COST OF REPORTING FOR THE SECOND YEAR

Burden Item	Person-hours occurrence	Number of occurrence s per year	Person- hours per Responden t	Respondent s per year	Technica l person-hours	Managemen t person-hours	Clerical person-hours	Capital/ Startup Cost**	O&M Cost**	Total Cost (\$) Year 2
1. Applications	N/A									
2. Surveys and Studies	N/A									
3. Reporting Requirements										
A. Read Instructions	N/A									
B. Required Activities										
C. Gather Existing Information		Included in 3D								
D. Write Report										
										\$10,337,27
										6
										\$2,215,130
4. Recordkeeping Requirements										
A. Read Instructions		Included in 3A								
B. Train personnel										
C. Continuous monitoring										
-Follow Manufacturer's Instructions	None									
-pressure and temp. (large RICE)	30	1	30	19,678	590,338	29,517	59,034	40		\$787,117
										\$10,061,14
-record information	0.5	12	6	19,678	118,068	5,903	11,807			1
-Record information (hrs of operation)	1	1	1	738,896	738,896	36,945	73,890			\$62,965,11
										0
<b>SUBTOTAL BURDEN AND COST</b>				<b>825,545</b>	<b>1,594,60</b>	<b>4</b>	<b>79,730</b>	<b>0</b>	<b>159,46</b>	<b>\$86,365,77</b>
<b>AVERAGE PER RESPONDENT</b>					<b>2</b>	<b>0.10</b>	<b>0.19</b>			<b>105</b>

\*Costs are based on December 2008 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$77, management at \$90 and clerical at \$38.

\*\*Costs per Respondent.

TABLE 3. RESPONDENT BURDEN AND COST OF REPORTING FOR THE SECOND YEAR

Burden Item	Person-hours occurrence	Number of occurrence s per year	Person- hours per Responden t	Respondent s per year	Technica l person- hours	Managemen t person- hours	Clerical person- hours	Capital/ Startup Cost**	O&M Cost**	Total Cost (\$ ) Year 2
1. Applications	N/A									
2. Surveys and Studies	N/A									
3. Reporting Requirements										
A. Read Instructions	N/A									
B. Required Activities										
C. Gather Existing Information		Included in 3D								
D. Write Report										
										\$10,337,27
										6
-Semiannual compliance report	1	2	2	60,654	121,308	6,065	12,131			
-Annual compliance report	1	1	1	25,995	25,995	1,300	2,599			\$2,215,130
4. Recordkeeping Requirements										
A. Read Instructions		Included in 3A								
B. Train personnel										
C. Continuous monitoring										
-Follow Manufacturer's Instructions	None									
-pressure and temp. (large RICE)	30	1	30	19,678	590,338	29,517	59,034	40		\$787,117
										\$10,061,14
-record information	0.5	12	6	19,678	118,068	5,903	11,807			1
-Record information (hrs of operation)	1	1	1	738,896	738,896	36,945	73,890			\$62,965,11
										0
<b>SUBTOTAL BURDEN AND COST</b>				<b>825,545</b>	<b>1,594,60</b>	<b>4</b>	<b>79,730</b>	<b>159,46</b>	<b>0</b>	<b>\$86,365,77</b>
										4

**AVERAGE PER RESPONDENT**

2 0.10 0.19 105

\*Costs are based on December 2008 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$77, management at \$90 and clerical at \$38.

\*\*Costs per Respondent.

(iii) **Total Operation and Maintenance Costs** No costs were attributed to the requirement of following the manufacturer's emission-related operation and maintenance requirements or the owner or operator's own maintenance plan. It is expected that the majority of owners and operators are already following some type of O&M requirements and minimal to no additional burden is expected.

No annual operating and maintenance costs were estimated for the portable CO monitors since EPA expects that a testing firm will be conducting the initial performance test. Therefore, no O&M cost has been estimated for performance testing.

Beyond operating and maintaining the CPMS for engines subject to continuous monitoring of the catalyst pressure drop and catalyst inlet temperature, no additional cost was estimated for the CPMS. The total cost associated with the CPMS includes the annualized capital costs and the cost of labor. It is estimated that 30 hours per year is necessary to operate and maintain the CPMS and that 6 hours per year (or 0.5 hours per month) is needed to record information from the CPMS. It is assumed that all engines subject to continuous monitoring would be located at large engine facilities.

**(c) Estimating Agency Burden and Cost**

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under section 112 of the CAA, no operational costs will be incurred by the Federal government. Examination of records to be maintained by the respondents would occur incidentally as part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program and, therefore, is not attributable to the ICR.

The Agency burden and cost estimates include only those items where the government would incur additional costs as a result of the information collection. These costs include user costs associated with the review and analysis of the reported information. These are presented in Tables 4 through 6.

The hourly burden for review of reports was estimated based on assumptions made for previous rulemakings on what level of effort is involved in reviewing these types of reports. Labor rates for Federal employees are based on the January 2008, Office of Personnel Management pay rates for General Schedule employees (see <http://www.opm.gov/oca/08tables/>). The pay rates were multiplied by the standard government benefits multiplication factor of 1.6. The resulting average hourly labor costs are \$50 for technical personnel, \$83 for management, and \$29 for clerical.

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

The respondent universe was estimated through information available in the Power Systems Research's (PSR) North American Engine PartsLink Database provided by the U.S. EPA Office of Transportation and Air Quality. It is estimated that 825,545 existing CI engines will be subject to requirements under this ICR annually. The total burden is calculated by adding the total technical, management, and clerical hours per year. The technical hours are calculated by multiplying the total hours per respondent by the number of respondents per year for each respondent activity. Management and clerical hours are assumed to be 5 percent and 10 percent of the technical hours, respectively.

The total cost is calculated by summing the labor, capital/startup, and O&M costs. With the exception of the costs for performance tests, the labor costs are determined by multiplying the total labor hours by the total wage rate for each labor category. The total capital/startup and

O&M costs are calculated by multiplying the cost for each respondent by the number of respondents. Total cost is presented in the far right column of each table.

**TABLE 4. FEDERAL GOVERNMENT BURDEN AND COST FOR THE FIRST YEAR**

Activity	EPA hours per operation	Operations per year	Technical person-hours per year	Management person-hours per year	Clerical person-hours per year	Total Cost (\$) Year 1
<b>Report Review</b>						
1. Notification of performance test	2	86,649	173,297	8,665	17,330	9,886,605
2. Initial notification of compliance	2	86,649	173,297	8,665	17,330	9,886,605
3. Semiannual Compliance Report	2	121,308	242,616	12,131	24,262	13,841,247
4. Annual Compliance Report	2	25,995	51,989	2,599	5,199	2,965,982
<b>SUBTOTAL BURDEN AND COST</b>			<b>641,200</b>	<b>32,060</b>	<b>64,120</b>	<b>36,580,439</b>

\*Costs for notifications are based on January 2008 Office of Personnel Management labor statistics for Federal Workers. Costs are estimated using the following rates: technical at \$50, management at \$83, and clerical at \$29.

**TABLE 5. FEDERAL GOVERNMENT BURDEN AND COST FOR THE SECOND YEAR**

Activity	EPA hours per operation	Operations per year	Technical person-hours per year	Management person-hours per year	Clerical person-hours per year	Total Cost (\$) Year 2
<b>Report Review</b>						
1. Semiannual Compliance Report	1	60,654	60,654	3,033	6,065	3,460,312
2. Annual Compliance Report	1	25,995	25,995	1,300	2,599	1,482,991
<b>SUBTOTAL BURDEN AND COST</b>			<b>86,649</b>	<b>4,332</b>	<b>8,665</b>	<b>4,943,303</b>

\*Costs for notifications are based on January 2008 Office of Personnel Management labor statistics for Federal Workers. Costs are estimated using the following rates: technical at \$50, management at \$83, and clerical at \$29.

TABLE 6. FEDERAL GOVERNMENT BURDEN AND COST FOR THE THIRD YEAR

Activity	EPA hours per operation	Operations per year	Technical person-hours per year	Management person-hours per year	Clerical person-hours per year	Total Cost (\$) Year 3
<b>Report Review</b>						
1. Semiannual Compliance Report	1	60,654	60,654	3,033	6,065	3,460,312
2. Annual Compliance Report	1	25,995	25,995	1,300	2,599	1,482,991
<b>SUBTOTAL BURDEN AND COST</b>				<b>86,649</b>	<b>4,332</b>	<b>8,665</b>
*Costs for notifications are based on January 2008 Office of Personnel Management labor statistics for Federal Workers. Costs are estimated using the following rates: technical at \$50, management at \$83, and clerical at \$29.						

**(e) Bottom Line Burden Hours and Cost Tables**

(i) Respondent Tally A breakdown for each of the collection, reporting, and recordkeeping activities required by the NESHAP is presented in Tables 1 through 3. The estimate of total annual hours requested from the respondents was based on the assumptions outlined in section 6(d) of this supporting statement. The EPA estimated the respondent burden by totaling the hours for the first 3 years after the implementation of the NESHAP for technical, managerial, and clerical staff at the facility, and then dividing that total by three to determine the average annualized burden. The 3-year summary results are presented in Table 7. The total number of responses for these respondents over the first 3 years after the implementation of the NESHAP is estimated to be 2,927,207, or an average of 975,736 per year. For the first 3 years after the implementation of the NESHAP, the EPA estimates that industry would expend 2,232,379 hours annually at a cost of \$152,900,765 per year to meet the monitoring, recordkeeping, and reporting requirements. Note that the 3-year summary begins with the first year the rule becomes effective, i.e., 3 years after promulgation. In other words, year 1 for this ICR would be in 2013.

(ii) The Agency Tally A breakdown for each of the Agency activities required for the NESHAP is provided in Tables 4 through 6. The bottom line Agency burden hours and costs, presented in Table 8, are calculated by totaling the hours per year for technical, managerial, and clerical staff, and by totaling the cost column. The average annual burden is calculated by dividing the 3-year total by three. The estimated average annual burden, over the first 3 years, for the Agency would be 312,224 hours at a cost of \$15,489,015 per year.

TABLE 7. SUMMARY OF RESPONDENT BURDEN AND COST

Year	Number of Respondents	Technical person-hours	Management person-hours	Clerical person-hours	Total person-hours	Total Cost (\$)
First	825,545	2,634,388	131,719	263,439	3,029,546	285,970,747
Second	825,545	1,594,604	79,730	159,460	1,833,795	86,365,774
Third	825,545	1,594,604	79,730	159,460	1,833,795	86,365,774
<b>Three Year Total</b>	<b>2,476,635</b>	<b>5,823,597</b>	<b>291,180</b>	<b>582,360</b>	<b>6,697,136</b>	<b>458,702,295</b>
<b>Annual Average</b>	<b>825,545</b>	<b>1,941,199</b>	<b>97,060</b>	<b>194,120</b>	<b>2,232,379</b>	<b>152,900,765</b>

\*Costs are based on December 2008 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$77, management at \$90 and clerical at \$38.

TABLE 8. SUMMARY OF AGENCY BURDEN AND COST

Year	Number of Respondents	Technical person-hours	Management person-hours	Clerical person-hours	Total person-hours	Total Cost (\$)
First	825,545	641,200	32,060	64,120	737,380	36,580,439
Second	825,545	86,649	4,332	8,665	99,646	4,943,303
Third	825,545	86,649	4,332	8,665	99,646	4,943,303
<b>Three Year Total</b>	<b>2,476,635</b>	<b>814,497</b>	<b>40,725</b>	<b>81,450</b>	<b>936,671</b>	<b>46,467,045</b>
<b>Annual Average</b>	<b>825,545</b>	<b>271,499</b>	<b>13,575</b>	<b>27,150</b>	<b>312,224</b>	<b>15,489,015</b>

\*Costs are based on January 2008 Office of Personnel Management labor statistics for Federal Workers. Costs are estimated using the following rates: technical at \$50, management at \$83, and clerical at \$29.

(iii) Variations in the Annual Bottom Line The total burden and cost estimates for the first 3 years after the NESHAP is promulgated are given in Tables 1 through 3 and Table 7. The variation in total activity and respondent burden and cost from year to year is shown in the tables. In years 1, 2, and 3, the total costs are \$285,970,747; \$86,365,774; and \$86,365,774; respectively (see Tables 1 through 3 and 7). In the first year, 86,649 engines are reading instructions, submitting notifications of performance tests, notification of compliance, and semi-annual compliance reports (or annual reports if limited use engines), and conducting performance tests. 19,678 engines are monitoring the pressure drop across the catalyst and monitoring the catalyst inlet temperature. 738,896 emergency engines are keeping records of their hours of operation. In the second and third years, 86,649 engines are submitting semi-annual compliance reports (or annual reports if limited use engines), 19,678 are monitoring catalyst pressure drop and catalyst inlet temperature, and 738,896 emergency engines are keeping records of the hours of operation. Thus, the number of respondents, the respondent burden and respondent costs decrease after the first year.

The total number of agency hours for review of reports decreases since many engines will only have to conduct an initial performance test. Each year the agency must review semi-annual compliance reports, but notifications of performance tests and notifications of initial compliance will only be in year 1. The total number of agency hours for years 1, 2, and 3 are 737,380; 99,646; and 99,646, respectively. The corresponding agency costs for activities during these years are \$36,580,439; \$4,943,303; and \$4,943,303 (see Table 8).

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

This is the initial estimation of burden for this ICR; therefore this section does not apply.

**(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average about 2 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 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.

EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2008-0708, which is available for public viewing at the Air and Radiation Docket and Information Center, in the EPA Docket Center (EPA/DC), EPA West, Room B102, 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available through at <http://www.regulations.gov>. Use this site 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. Once in the system, select "advance search," then "Docket

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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. (EPA-HQ-OAR-2008-0708) in any correspondence.

## PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1  
SOURCE DATA AND INFORMATION REQUIREMENTS

Recordkeeping Requirements	40 CFR 63 Subpart ZZZZ
5-year retention of records	63.6660(b)
Records of all notifications and reports	63.6655(a)(1)
Records of the occurrence and duration of each startup, shutdown, or malfunction of the stationary RICE and each malfunction of the air pollution control equipment	63.6655(a)(2)
Records of performance tests and performance evaluations	63.6655(a)(3)
Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of malfunction or during another period	63.6650(b)(4)
Records of the catalyst pressure drop (measured monthly) and catalyst inlet temperature (4-hour average)	63.6655(d)
Records of maintenance conducted on the engine	63.6655(e)
Records of the number of hours of operation recorded through a non-resettable hour meter	63.6655(f)

Reporting Requirements	40 CFR 63 Subpart ZZZZ
Report the following information semiannually: -company name and address -name, title, and signature of the responsible official certifying the accuracy of the report -date of report and beginning and ending dates of the reporting period -if no deviations occurred during the period, a statement that no deviations occurred -information on deviations, startup, shutdown, and malfunctions	63.6650
Report the following information by fax or telephone within 2 working days after starting actions inconsistent with the	63.6650

ATTACHMENT 1  
SOURCE DATA AND INFORMATION REQUIREMENTS

Reporting Requirements	40 CFR 63 Subpart ZZZZ
<p><b>SSMP:</b></p> <ul style="list-style-type: none"><li>-an immediate startup, shutdown, and malfunction report which contains actions taken for the event</li></ul>	
<p>Report the following information by letter within 7 working days after the end of the event, unless alternative arrangements have been made with the permitting authorities:</p> <ul style="list-style-type: none"><li>-name, title, and signature of the responsible official who is certifying the accuracy of the report</li><li>-the circumstances of the event</li><li>-the reasons for not following the startup, shutdown, and malfunction plan</li></ul>	63.6650