SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Renewal), EPA ICR Number 1967.04, OMB Control Number 2060-0540

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR part 63, subpart YYYY) were proposed on January 14, 2003, and promulgated on March 5, 2004. In addition, the standard was amended on August 18, 2004, to stay the effectiveness of two subcategories of turbines: 1) lean pre-mix gas-fired turbines; and 2) diffusion flame gas-fired turbines. These regulations apply to new sources that commenced construction or reconstruction after the date of the final rule. This information is being collected to assure compliance with 40 CFR part 63, subpart YYYY.

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.

There is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site). Over the next three years, an average of 22 respondents per year will be subject to the standard, and 9 additional respondents per year will become subject to the standard.

The previous Information Collection Request (ICR) had the following Terms of Clearance (TOC):

> The assumptions used to calculate burden and cost for industry and the agency need to be updated before resubmitting it for approval.

EPA addressed the TOC by updating respondent assumptions using September 2009 labor rates from the United States Department of Labor, Bureau of Labor Statistics. Agency assumptions were updated using the Office of Personnel Management (OPM), 2010 General Schedule for Agency labor. Respondent and Agency cost assumptions are provided in Sections 6(b)(i) and 6(c) of this document.

The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Renewal). The burden to the "Federal government" is attributed entirely to work performed by Federal employees or government contractors. This burden may be found below in Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Renewal).

Compliance with the subject standard includes the option of electronic reporting to the extent practicable. Respondents may report to the appropriate authority electronically if they choose to do so. Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically.

Some respondents are using monitoring equipment at the affected facilities that automatically records monitoring data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

At this point in time, electronic reporting systems have not been widely adopted by the respondents. A majority of the respondents prefer to send written reports to the regulating entity. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

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, formaldehyde emissions from the combustion of oil cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart YYYY.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensures compliance with the applicable regulations which where promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards 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 standards 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 and the standards are 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 YYYY.

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 (74 FR 38004) on July 30, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Air Facility System (AFS) which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry was based on our consultations with the Agency's internal industry experts. Approximately 31 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history

of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and/or operators of stationary combustion turbines. Stationary combustion turbines are used in more than 34 different industry and government sectors. However, the majority of the sources covered by Subpart YYYY fall into five Standard Industrial code (SIC) and North American Industry Classification System (NAICS) code categories listed in the table below.

Standard	SIC	NAICS
40 CFR part 63, subpart YYYY	49, 46, 13, 28, 29	221, 486, 211, 325, 324

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY).

A source must make the following reports:

Notifications	
Initial Notification for Gas-Fired Turbines	63.6095(d)
Notification of Construction/Reconstruction.	63.6145
Notification of Actual Startup.	63.9(b)

Notifications	
Notification of Performance Test.	63.7(b)(1), 63.6145(e)
Notification of Compliance Status	63.(h)(2)(ii), 63.6145(f)

Reports	
Performance Test Plan	63.7(c)
Semi-annual Compliance Report.	63.6150(a)

A source must keep the following records:

Recordkeeping	
Maintain records of monitoring data.	63.6155
Maintain records for five years.	63.6160(b)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate the catalyst inlet temperature monitor
Perform initial performance test, Reference Method 320 test, 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.

Respondent Activities
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.

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
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 AIRS Facility Subsystem (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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. 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 the EPA Office of Compliance. AFS is the EPA 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

A majority of the respondents are large entities (i.e., large businesses). The number

of small entities potentially affected by this rule could not be determined based on review of available rule documentation. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost: NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Renewal).

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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 435 hours (Total Labor Hours from Table 1). The recordkeeping hours shown below in Table 1 are 255. The reporting requirement hours shown below in Table 1 are 180. 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	$114.49 ($54.52 + 110%)
Technical	$98.20 ($46.76 + 110%)
Clerical	$48.53 ($23.11 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics,

September 2009, Table 2. Civilian Workers, by Occupational and Industry group. The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

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

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Catalyst Inlet Temperature	$500.00	3	$1,500.00	0	17.5	0

The total capital/startup costs for this ICR are $1,500. This is the total of column D in the above table. There are no annual operation and maintenance (O&M) costs associated with this standard. We expect the catalyst inlet temperature monitor to be maintenance free.

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 $1,500.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 $11,920.

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

Managerial	$62.27 (GS-13, Step 5, $38.92 + 60%)
Technical	$46.21 (GS-12, Step 1, $28.88 + 60%)
Clerical	$25.01 (GS-6, Step 3, $15.63 + 60%)

These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Renewal).

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 13 existing respondents will be subject to the standard. It is estimated that an additional 9 respondents per year will become subject. The overall average number of respondents, as shown in the table below is 31 per year.

The number of respondents is calculated using the following table that 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 [1]	(B) Number of Existing Respondents[2]	(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	9	13	0	0	22
2	9	22	0	0	31
3	9	31	0	0	40
Average	9	22	0	0	31

[1] New respondents include sources with constructed, reconstructed and modified affected facilities. We estimate that six (6) of the nine (9) sources will be gas fired turbines and the remaining three (3) will be oil fired turbines. Gas-fired turbines are only subject to a one-time initial notification requirement.

[2] Although there are a number of gas-fired turbines that previously submitted one-time initial notifications during the pervious ICR period, they have no additional compliance responsibilities, including recordkeeping and reporting, over the next three years. Therefore, they are not included as respondents for the purpose of this ICR.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 31. The total number of annual responses per year is calculated using the following table:

Total Annual Responses

(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial Notification	6	1	0	6
Notification of Construction	3	1	0	3
Notification of Startup	3	1	0	3

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Performance Test Notification	3	1	0	3
Notification of Compliance	3	1	0	3
Semi-Annual Compliance Report	17.5[1]	2	0	35
			Total	53

[1] We estimate that there are 13 existing sources currently subject to subpart YYYY. We also estimate that three (3) new sources will come on-line each year that will be required to submit semiannual compliance reports. Therefore, the average number of respondents submitting semiannual compliance reports over the next three years is estimated to be 17.5 (13 existing + 4.5 new sources). The average of 4.5 new sources over the next three years was estimated by dividing the total number of new sources over the next three years (9) by two (2).

The number of Total Annual Responses is 53. The total annual labor costs are $41,152. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Renewal).

The total annual capital/startup and O&M costs to the regulated entities are $1,500. 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 265 labor hours at a cost of $11,920. See below Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY).

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 hours are 435. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 (rounded) hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $1,500. 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 265 labor hours at a cost of $11,920. See below Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours to respondents in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

The increase in cost to the respondents and the Agency is due to labor rate adjustments to reflect the most recent available estimates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 hours (rounded) 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-2009-0544. 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 Avenue, N.W., 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0544 and OMB Control Number 2060-0540 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 STATIONARY COMBUSTION TURBINES (40 CFR PART 63, SUBPART YYYY)

	A	B	C	D	E	F	G	H	I
Reporting/Recordkeeping Requirements	**Hours/ Occurrence**	**Occurrences/ Year**	**Hours/Year (C = A x B)**	**Respondents/ Year**	**Technical Hours/Year (C*D)**	**Managerial Hours/Year (E*0.05)**	**Clerical Hours/Year (E*0.10)**	**Total Hours/Year (H=E+F+G)**	**Total Costs/Year [a]**
1. Applications	N/A								
2. Survey and Studies	N/A								
3. Reporting Requirements									
A. Read Instructions [b]	4	1	4	9	36	1.80	3.60	41.40	3,919.23
B. Required Activities [c]	12	1	12	3	36	1.80	3.60	41.40	3,919.23
Performance Tests									
C. Create Information	Included in 3B								
D. Gather Existing Information	Included in 3B								
E. Write Report									
Notification of Gas-Fired Turbines [d]	2	1	2	6	12	0.60	1.20	13.80	1,306.41
Notification of Construction/Reconstruction [d]	2	1	2	3	6	0.30	0.60	6.90	653.21
Notification of Initial Performance Test [d]	2	1	2	3	6	0.30	0.60	6.90	653.21
Notification of Actual Startup [d]	2	1	2	3	6	0.30	0.60	6.90	653.21
Notification of Compliance Status [d]	2	1	2	3	6	0.30	0.60	6.90	653.21
Semi-Annual Compliance Report [e]	8	2	16	3	48	2.40	4.80	55.20	5,225.64
Reporting Subtotal								180	16,983
4. Recordkeeping Requirements									
A. Read Instructions	Included in 3A								
B. Plan Activities	Included in 3B								
C. Implement Activities	Included in 3B								
D. Time to Enter Information									
Purchase and Install Catalyst Inlet Temperature Monitor	30	1	30	3	90	4.50	9.00	103.50	9,798.08
Records of Operating Parameters [e]	0.5	12	6	22	132	6.60	13.20	151.80	14,370.51
F. Train Personnel	N/A								
G. Audits	N/A								
Recordkeeping Subtotal								255	24,169
TOTAL ANNUAL BURDEN								**435**	**41,152**

Assumptions:

a) This ICR uses the following labor rates: Managerial $114.49 ($54.52 + 110%); Technical $98.20 ($46.76 + 110%); and Clerical $48.53 ($23.11 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, Table 2. Civilian workers, by Occupational and Industry group. The rates are from column 1, "Total compensation". The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

b) It is assumed that four hours are required to read instructions.

c) It is assumed that 12 hours are required to complete the performance test.

d) It is assumed that two hours are required to prepare each notification.

d) It is assumed that eight hours are required to prepare semi-annual compliance report.

e) It is assumed that one half-hour is required to record operating parameters.

TABLE 2: ANNUAL BURDEN AND COST FOR THE FEDERAL GOVERNMENT: NESHAP FOR STATIONARY COMBUSTION TURBINES (40 CFR PART 63, SUBPART YYYY)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/Year (C=A*B)	(D) Plants/ Year	(E) Technical Hours/Year (C*D)	(F) Managerial Hours/Year (E*0.05)	(G) Clerical Hours/Year (E*0.10)	(H) Total Hours/Year (H=E+F+G)	(I) Total Costs/Year [a]
Report Review [b]									
New or Reconstructed									
Review Initial Notification for Gas-Fired Turbines [c, d]	2	1	2	6	12	0.60	1.20	13.80	621.89
Review Notification of Construction/Reconstruction [c, e]	2	1	2	3	6	0.30	0.60	6.90	310.95
Review Notification of Actual Startup [c]	2	1	2	3	6	0.30	0.60	6.90	310.95
Notification of Initial Performance Test [c]	2	1	2	3	6	0.30	0.60	6.90	310.95
Review Performance Test Results [f]	8	1	8	3	24	1.20	2.40	27.60	1243.79
Review Semi-Annual Compliance Reports [g, h]	8	1	8	22	176	8.80	17.60	202.40	9121.11
Report Review Subtotal								265	11,920
TOTAL ANNUAL BURDEN								**265**	**11,920**

Assumptions:

a) This ICR uses the following labor rates: Managerial $62.27 (GS-13, Step 5, $38.92 + 60%); Technical $46.21 (GS-12, Step 1, $28.88 + 60%); and Clerical $25.01 (GS-6, Step 3, $15.63 + 60%). These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. This ICR assumes that Clerical hours are 10 percent of Technical hours and Managerial hours are 5 percent of Technical hours.

b) It is assumed that there will be nine new or reconstructed turbines per year.

c) It is assumed that two hours are required to review each notification.

d) It is assumed that six new gas-fired turbines will be added per year.

e) It is assumed that three new oil-fired turbines will be added per year.

f) It is assumed that eight hours are required to review each performance test report.

g) It is assumed that eight hours are required to review each semi-annual compliance report.

h) It is assumed that the average number of existing sources is 22.