

**SUPPORTING STATEMENT PART A:
INFORMATION COLLECTION REQUEST
FOR THE
MANDATORY REPORTING OF GREENHOUSE GASES –
CORPORATE ID RULE AMENDMENT**

**OMB Control No. 2060-NEW
EPA ICR No. 2374.02**

August 2010

**SUPPORTING STATEMENT
FOR MANDATOR REPORTING OF GREENHOUSE GASES -
CORPORATE ID RULE AMENDMENT
EPA ICR #2374.02**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

TITLE: “Mandatory Reporting of Greenhouse Gases (GHG Reporting Rule) – Corporate ID Rule Amendment.”

OMB Control Number: 2060-NEW

1(b) Short Characterization/Abstract

The United States (U.S.) Environmental Protection Agency (EPA) is amending the GHG Reporting Rule to require facilities subject to the rule to provide additional information items. These items include the following: legal name, physical address, and ownership status of a facility’s ultimate US parent company; the facility’s primary North American Industry Classification System (NAICS) codes; and whether or not reported emissions include those from a cogeneration unit. The amendments also require facilities owned by more than one parent company to report the address and percent of facility ownership for each parent company.

These items will be added to the monitoring, recordkeeping, and reporting burden calculated when the GHG Reporting Rule was promulgated on October 30, 2009 (74 FR 56260). The final rule requires reporting of greenhouse gas emissions from all sectors of the economy. The rule does not require control of greenhouse gases, rather it requires only that sources above certain threshold levels monitor and report emissions.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Signed into law on December 26, 2007, the FY2008 Consolidated Appropriations Act (henceforth referred to as the “Appropriations Act”) directed EPA to “develop and publish a draft rule not later than 9 months after the date of enactment of this Act, and a final rule not later than 18 months after the date of enactment of this Act, to require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy of the United States.”

The accompanying explanatory statement further directed EPA to “use its existing authority under the Clean Air Act” (CAA) to develop a mandatory GHG reporting rule. The Agency is further directed to include in its rule reporting of emissions resulting from upstream production and downstream sources, to the extent that the Administrator deems it appropriate. The Administrator shall determine appropriate thresholds of emissions above which reporting is required, and how frequently reports shall be submitted to EPA. The Administrator shall have discretion to use existing reporting requirements for electric generating units under §821 of the 1990 CAA amendments.

The Final GHG Reporting Rule fulfilled the requirements of the Appropriations Act. These amendments simply add additional reporting elements to the list of items in §98.3(c) of the final rule. Specifically, all facilities reporting under the GHG Reporting Rule are required to list the name and address of their ultimate US parent company, the primary North American Industry Classification System (NAICS) code, and all other applicable NAICS codes and to specify whether reported emissions include those from a cogeneration unit. The amendments also require facilities owned by more than one parent company to report the address and percent of facility ownership for each parent company.

Given the broad scope of CAA section 114, it is appropriate for EPA to gather the information required by this final rule because such information is relevant to EPA’s implementation of a wide variety of CAA provisions.

2(b) Practical Utility/Users of the Data

The purpose of collecting the name and physical address of the U.S. parent company(s) in the annual reports for 40 CFR part 98 is to assist in aggregating facility-based GHG emissions data to the corporate level. This additional data element allows EPA to compile more comprehensive information on corporate GHG emissions and conduct a variety of analyses. For example, the data collected under this final rule would be immediately available to EPA and could inform EPA's implementation of CAA section 103(g) regarding improvements in sector-based nonregulatory strategies and technologies for preventing or reducing air pollutants.

In addition, the data collected through this final rule would be immediately available to EPA and could be used for the purposes of providing additional information to support more effective research and develop actions to address GHG emissions. For example, corporate parent and NAICS data would assist EPA in developing and improving emission inventories, as well as characterize emissions data in several different ways. A more detailed understanding of the sources and operational categories of GHG emissions could lead to improvements in air pollution emissions information that is relied upon to develop effective control strategies. For example, EPA could use the NAICS code information gathered by this rule to compare results both within industries and across industry sectors.

Finally, the information gathered through this rule will be immediately available to enhance EPA's implementation of various nonregulatory programs aimed at encouraging voluntary reductions of GHG emissions. Under the authority of CAA section 103, EPA has launched a variety of nonregulatory programs aimed at reducing emissions of GHGs. The additional data will assist EPA by providing more detailed information on possible sources, and facility operations within industrial sectors for EPA to work with in the context of these programs.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

EPA evaluated existing GHG programs and the GHG data currently available to determine whether the final GHG Reporting Rule duplicated other information collections. As this is simply an amendment for additional reporting requirements, the same analysis applies.

Documentation of EPA's review of GHG monitoring protocols for each source category used by federal, state, and international voluntary and mandatory GHG programs, and the review of state mandatory GHG rules, can be found in the docket at EPA-HQ-OAR-2008-0508-056.

3(b) Public Notice Required Prior to Information Collection Request (ICR) Submissions to OMB

In response to the request for public comments in the preamble, EPA received two written comments that questioned the need for EPA to collect parent company information. One commenter submitted that company affiliation should not be used as a factor in policy development. The other commenter's primary objection was that EPA had been vague and non-specific in justifying collection of parent company information. The commenter stated that EPA's authority to collect information under section 114 is limited by the requirements of the Paperwork Reduction Act (5 C.F.R. 1320), under which EPA must demonstrate that the requested information has "practical utility." The commenter felt that EPA had not met the definition of "practical utility" in its justification for collecting parent company information. The commenter added that as practical utility is necessary for OMB to grant an ICR, EPA should not finalize this requirement until it has identified and solicited comment on a practical use.

EPA responded to these comments in the preamble to the final rule as follows: As explained in the section I.C of the preamble, section 114 of the CAA is sufficiently broad for EPA to collect this information. Section 114 generally authorizes EPA to gather information from any person who owns or operates an emissions source, who is subject to a requirement of the CAA, who manufacturers control or process equipment, or who the Administrator believes has information necessary for the purposes of section 114(a). EPA may gather information for purposes of establishing implementation plans or emissions standards, determining compliance, or "carrying out any provision" of the Clean Air Act. For these reasons, the Administrator may request that a person, on a one-time, periodic or continuous basis, establish and maintain records, make reports, install and operate monitoring equipment and, among other things, provide such information the Administrator may reasonably require. This language has been interpreted to grant EPA broad authority. See, e.g., *Dow Chemical Co. v. U.S.*, 467 U.S. 227, 233 (1986) ("Regulatory and enforcement authority generally carries with it all modes of inquiring and investigation traditionally employed or useful to execute the authority granted.").

It is reasonable for EPA to request the parent company information. Once EPA has this information, EPA will be able to immediately use it to assist in implementation of agency policy and program goals including developing and improving emission inventories and enhancing the implementation of programs aimed at reducing emissions of GHGs. For more information, refer to section I.C of the preamble, where EPA has further explained the immediate usefulness of this information under the Clean Air Act, as well as section 2 of this ICR supporting statement.

3(c) Consultations

EPA met with over 4,000 people and 135 groups since proposal signature (March 10, 2009) of the GHG Reporting Rule. Details of these meetings are available in the docket (EPA-HQ-OAR-2008-0508). No additional consultations were held during the drafting of these amendments.

3(d) Effects of Less Frequent Collection

If the information collection were not carried out on this schedule, the Agency would not be able to develop an informed tracking system of trends in GHG emissions across the country. The year-by-year GHG emissions information from a broad range of industry sectors may eventually be used to inform future climate change policy decisions.

EPA recognizes that highest level US parent company and primary NAICS code(s) may change more frequently than annually. However, EPA believes that the burden of requiring facilities to update these data elements on a more frequent basis, such as every time a facility's highest level US parent company changes, or primary product(s), activity(s), or service(s), is greater than the benefit of obtaining that additional information. Therefore, EPA is only requiring these data elements annually, thus lessening the burden as much as possible while still gathering the required information.

3(e) General Guidelines

This collection of information is consistent with all OMB guidelines under 5 CFR 1320.6. However, these amendments, as well as the final GHG Reporting Rule, require that facilities retain records for a period of 5 years, which exceeds the 3-year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of the Office of Management and Budget (OMB) regulations implementing the Paperwork Reduction Act.

Facilities or suppliers that have emissions or products with emission less than 25,000 metric tons CO₂e for five years in a row may cease reporting. Those that cease reporting must have records to cover those five years of emissions. EPA selected a 5-year period, instead of a shorter time frame, because it allows facilities or suppliers that consistently report less than 25,000 metric tons CO₂e to stop reporting, but avoids the situation where a facility or supplier near this level would be constantly moving in and out of the reporting program due to small variations from one year to the next. EPA believes 5 years of records for these respondents is needed to document that they meet the provisions to cease reporting and so that questions about past emission estimates can be resolved, if needed. Thus, the 5-year record retention requirement of the rule adds no additional burden.

3(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the proposed confidentiality determination published on July 7, 2010 (75 FR 39094). The determination specified which data reporting elements in part 98 would be treated as confidential business information (CBI) and which data elements must be available to the public under section 114 of the CAA. A final determination will be issued before any part 98 data is released.

3(g) Sensitive Questions

This ICR does not involve matters of a sensitive nature.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/North American Industrial Classification Systems (NAICS) Codes

The amendments would affect owners and operators of fuel and chemicals suppliers and direct emitters of GHGs who are already subject to the rule as well as those who would become subject to the rule in the future. However, the burden estimate presented in this statement is based on industries subject to the GHG Reporting Rule as of July 2010 and does not account for facilities expected to be added to the program through supplemental proposals. The methods and assumptions used to estimate the compliance costs for industries currently subject to the rule would likewise apply to industries that may be added to the Mandatory Reporting Program in the future. The addition of new industries would increase the reporting burden in proportion to the increase of the reporting universe. EPA will update and amend this statement as it adds new facilities to the Mandatory Reporting Program.

Industry sectors are listed in Table 4.1 by their corresponding category, the corresponding NAICS codes, and examples of affected facilities.

Table 4.1. Respondent Industry Sectors

Category*	NAICS Code	Examples of regulated entities
General Stationary Fuel Combustion Sources		Facilities operating boilers, process heaters, incinerators, turbines, and internal combustion engines:
	211	Extractors of crude petroleum and natural gas.
	321	Manufacturers of lumber and wood products.
	322	Pulp and paper mills.
	325	Chemical manufacturers.
	324	Petroleum refineries and manufacturers of coal products.
	316, 326, 339	Manufacturers of rubber and miscellaneous plastic products.
	331	Steel works, blast furnaces.
	332	Electroplating, plating, polishing, anodizing, and coloring.
	336	Manufacturers of motor vehicle parts and accessories.
	221	Electric, gas, and sanitary services.
	622	Health services.
Electricity Generation	611	Educational services.
	221112	Fossil-fuel fired electric generating units, including units owned by Federal and municipal governments and units located in Indian Country.
Adipic Acid Production	325199	Adipic acid manufacturing facilities.
Aluminum Production	331312	Primary Aluminum production facilities.
Ammonia Manufacturing	325311	Anhydrous and aqueous ammonia manufacturing facilities.
Cement Production	327310	Portland Cement manufacturing plants.
Ferroalloy Production	331112	Ferroalloys manufacturing facilities.
Glass Production	327211	Flat glass manufacturing facilities.
	327213	Glass container manufacturing facilities.
	327212	Other pressed and blown glass and glassware manufacturing facilities.
HCFC-22 Production and HFC-23 Destruction	325120	Chlorodifluoromethane manufacturing facilities.
Hydrogen Production	325120	Hydrogen manufacturing facilities.
Iron and Steel Production	331111	Integrated iron and steel mills, steel companies, sinter plants, blast furnaces, basic oxygen process furnace shops.
Lead Production	331419	Primary lead smelting and refining facilities.
	331492	Secondary lead smelting and refining facilities.
Lime Production	327410	Calcium oxide, calcium hydroxide, dolomitic hydrates manufacturing facilities.
Nitric Acid Production	325311	Nitric acid manufacturing facilities.
Petrochemical Production	32511	Ethylene dichloride manufacturing facilities.
	325199	Acrylonitrile, ethylene oxide, methanol manufacturing facilities.
	325110	Ethylene manufacturing facilities.
	325182	Carbon black manufacturing facilities.
Petroleum Refineries	324110	Petroleum refineries.

Category*	NAICS Code	Examples of regulated entities
Phosphoric Acid Production	325312	Phosphoric acid manufacturing facilities.
Pulp and Paper Manufacturing	322110	Pulp mills.
	322121	Paper mills.
	322130	Paperboard mills.
Silicon Carbide Production	327910	Silicon carbide abrasives manufacturing facilities.
Soda Ash Manufacturing	325181	Alkalies and chlorine manufacturing facilities.
	212391	Soda ash, natural, mining and/or beneficiation.
Titanium Dioxide Production	325188	Titanium dioxide manufacturing facilities.
Zinc Production	331419	Primary zinc refining facilities.
	331492	Zinc dust reclaiming facilities, recovering from scrap and/or alloying purchased metals.
Municipal Solid Waste Landfills	562212	Solid waste landfills.
	221320	Sewage treatment facilities.
Suppliers of Coal Based Liquids Fuels	211111	Coal liquefaction at mine sites.
Suppliers of Petroleum Products	324110	Petroleum refineries.
Suppliers of Natural Gas and NGLs	221210	Natural gas distribution facilities.
	211112	Natural gas liquid extraction facilities.
Suppliers of Industrial GHGs	325120	Industrial gas manufacturing facilities.
Suppliers of Carbon Dioxide (CO ₂)	325120	Industrial gas manufacturing facilities.
Magnesium Production	331419	Primary refiners of nonferrous metals by electrolytic methods.
	331492	Secondary magnesium processing plants.
Underground Coal Mines	212113	Underground anthracite coal mining operations.
	212112	Underground bituminous coal mining operations.
Industrial wastewater treatment	562212	Solid waste landfills.
	322110	Pulp mills.
	322122	Newsprint mills.
	322130	Paperboard mills.
	311611	Meat processing facilities.
	311411	Frozen fruit, juice, and vegetable manufacturing facilities.
	311421	Fruit and vegetable canning facilities.
	221320	Sewage treatment facilities.

Category*	NAICS Code	Examples of regulated entities
Industrial waste landfills	322110	Pulp mills.
	322121	Paper mills.
	322122	Newsprint mills.
	322130	Paperboard mills.
	311611	Meat processing facilities.
	311411	Frozen fruit, juice, and vegetable manufacturing facilities.
	311421	Fruit and vegetable canning facilities.
	325193	Ethanol manufacturing facilities.
	324110	Petroleum refineries.

*Manure Management (subpart JJ) is not included. EPA will not implement subpart JJ of the GHG Reporting Rule using funds provided in its FY2010 appropriations due to a Congressional restriction prohibiting the expenditure of funds for this purpose.

4(b) Information Requested

(i) Data Items

This final amendment requires facilities to report the following additional data fields: (1) the legal names and physical addresses of all parent companies and the percent of ownership held by each; (2) all applicable NAICS codes, one of which must be designated, and a second that may be designated, as primary; and (3) an indication (by checking yes or no) of whether or not the reported emissions include those from one or more cogeneration units.

EPA defines U.S. parent company(s) as the highest-level United States company(s) with an ownership interest in the reporting entity as of December 31 of the year for which data are being reported. The U.S. parent company's physical address is defined as the street, city, state and zip code of the U.S. parent company's physical location.

For this amendment, EPA defines a North American Industry Classification System (NAICS) code as the six-digit code that represents the product(s)/activity(s)/service(s) at the facility or supplier as listed in the Federal Register and defined in "North American Industrial Classification System Manual 2007," available from the U.S. Department of Commerce, National Technical Information Service. The final amendment requires reporters to provide the primary NAICS code that most accurately describes the primary product/activity/service at the facility, based on revenue. The primary product/activity/service is the principal source of revenue for the facility or supplier. If necessary, reporters may provide up to two primary NAICS codes. Reporters must also provide all additional NAICS codes that correspond to the product(s)/activity(s)/service(s) at the facility that are not related to the principal source of revenue for the facility or supplier.

For the purposes of this amendment, a cogeneration unit is defined as "a unit that produces electrical energy and useful thermal energy for industrial, commercial, or heating or cooling purposes, through the sequential or simultaneous use of the original fuel energy."

(ii) Respondent Activities

Respondent activities required by the standards are introduced in Section 6(a). To the extent practicable, the activities required by respondents were designed to make use of or to be consistent with existing reporting and recordkeeping practices.

In this rulemaking, the following data elements would be reported:

- Facility NAICS Code(s);
- Facility Cogeneration
- U.S. Parent Company Legal Name(s);
- Parent Company Physical Address(es); and
- Percent of Facility Ownership by each Parent Company.

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODS, AND INFORMATION MANAGEMENT

5(a) Agency Activities

There are not expected to be any EPA Headquarters activities associated with these amendments. Contractor burden will include changes to the electronic reporting forms and verifying the submitted data.

5(b) Collection Methodology and Management

EPA has already established a central repository of inventory data for all respondents. Respondents will report data electronically, and EPA will store the data in the database. The electronic format, which will reflect the underlying electronic data reporting system, will be developed prior to the first reporting date.

These amendments will require facilities subject to the rule to provide additional information items. The methodology for entering these data elements has not changed since the GHG Reporting Rule was promulgated on October 30, 2009 (74 FR 56260).

5(c) Small Entity Flexibility

EPA took several steps to minimize the impacts on small entities when the GHG Reporting Rule was finalized. The Agency met several times with industry trade associations to discuss the reporting options considered and their possible impacts on small entities. EPA further minimized impacts on small entities by not requiring facilities below a certain emissions threshold to report their emissions. Where feasible, EPA also used existing GHG emissions estimation and reporting methodologies or provided simplified methodological options to reduce reporting burden.

The same thresholds established by the final GHG Reporting Rule also apply to these amendments.

5(d) Collection Schedule

Facilities must report all US parent company(s) information and facility primary NAICS code(s) annually. EPA is requiring that the US parent company(s) and NAICS code(s) be reported as of December 31st of the reporting year, to remain consistent with the other requirements of the GHG Reporting Rule.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section presents EPA’s estimates of the burden and costs to respondents associated with the activities described in Section 4 as well as the federal burden hours and costs associated with the activities described in Section 5(a).

The average respondent reporting burden is estimated at 9,487 hours per year over the three years covered by this information collection.

Section 6(a) of this ICR provides estimates of burden (hours) for all respondent types. Section 6(b) contains estimates of respondent costs for the information collection. Section 6(c) summarizes federal burden and costs. Section 6(d) describes the respondent universe and the total burden and cost of this collection to respondents. Section 6(e) presents the bottom line burden and cost. The burden statement for this information collection is in Section 6(f).

6(a) Estimating Respondent Burden

The annual burden estimates for reporting are presented in Table 6.1.

Table 6.1 Estimated Total Labor Burden and Total Cost

	<i>Total Labor Burden (hours)</i>	<i>Total Cost</i>
First Reporting Year		
US Parent Company Legal Name, Physical Address, and Ownership Status	7,142	\$430,108
Facility NAICS Code(s) and Cogeneration	7,034	\$423,581
All Data Elements	14,176	\$853,689
Subsequent Reporting Years		
US Parent Company Legal Name, Physical Address, and Ownership Status	5,384	\$324,212
Facility NAICS Code(s) and Cogeneration	1,759	\$105,895
All Data Elements	7,142	\$430,107

6(b) Estimating Respondent Costs

Costs to respondents associated with these amendments include labor costs incurred by facility staff to report the additional information collection requirements.

The personnel responsible for reporting the required information are likely to vary by industry sector and/or by facility. Table 6.2 provides estimates of the expected personnel titles, labor categories, and loaded hourly wage rates. Loaded hourly wage rates represent the total cost to the facility per hour of labor, accounting for costs beyond the hourly rate paid to the employee such as fringe benefits and overhead.

To reflect that management, legal and technical staff will be involved in reporting the required data elements; a blended management/legal wage rate was created from the average of hourly wage rates of management and legal staff. A similar blended technical wage rate was calculated from the average of certain technical staff job classifications. An overall weighted wage rate was then developed based on estimates from the TRI program for similar data element reporting at similar facilities. According to the TRI estimates, management and legal staff are estimated to be involved in approximately 0.8% of the reporting effort, while technical staff are likely to be needed for the remaining 99.2%. Using these proportions, the weighted loaded wage rate, i.e., the blended labor rate, used in this analysis is \$60.22 per hour.

Table 6.2. Labor Rates

Personnel Type	Hourly Wage Rate
Management Personnel	
electricity manager	\$88.79
refinery manager	\$101.31
industrial manager	\$71.03
lawyer	\$101.00
Blended Management and Legal Wage Rate	\$90.53
Technical	
electricity engineer/technician	\$60.84
refinery engineer/technician	\$63.89
industrial engineer/technician	\$55.20
Blended Technical Wage Rate	\$59.98
Percent reporting by Management and Legal Personnel	0.8%
Percent reporting by Technical Personnel	99.2%
Blended Labor Rate	\$60.22

The time required to report the additional information collection requirements were estimated at approximately 80 minutes per facility in the first year (40 minutes per facility in subsequent years) to complete the following activities:

- o Identify and record parent company name,
- o Identify and record parent company address,
- o Determine and record percent of company ownership,
- o Identify and record primary NAICS code,
- o Identify and record 2 additional applicable NAICS codes, and
- o Identify and record cogeneration.

For each additional parent company, these amendments also require approximately 20 minutes, in all years, to complete the following activities:

- o Identify and record parent company name, and
- o Identify and record parent company address.

Each facility reporting more than one ultimate parent company requires an additional yearly labor burden of 5 minutes to determine and record percent ownership of the additional parent companies.

For purposes of these estimates, it was assumed that 10,406 respondents would have at least one parent company and 145 respondents would have multiple parent companies. It was estimated that these respondents have an average of 3 parent companies per facility. More details are contained in a memorandum entitled, “Total Labor Burden and Cost for Reporting of Corporate Parent Name, Address, and Percent Ownership: an Amendment to the GHG Reporting Rule.” The memo is located in the docket (EPA-HQ-OAR-2008-0508).

6(c) Estimating Agency Burden and Cost

There are not expected to be any EPA activities associated with these amendments. However, contractor support for modifying the reporting database forms (which will only occur in Year 1) and for verifying the information submitted (which will occur in all years) does contribute non-labor costs. The costs were estimated as follows:

- o Year 1 = \$90,000
- o Subsequent years = \$40,000

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

Every facility regulated under the GHG Reporting Rule will be required to report on the additional data elements covered under these amendments.

The total number of respondents is estimated at 10,551 per year.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden hours and costs are shown in Table 6.3a.

6(f) Reasons for Change in Burden

The existing GHG Reporting Rule ICR is being updated to include these amendments to the data collection requirements.

Table 6.3a Bottom Line Annual Burden and Cost

First Reporting Year	
Number of Respondents	10,551
Total Annual Responses	63,740
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	14,176
Respondent Hours per Response	0.22
Annual Respondent Labor Cost	\$853,689
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$853,689
Total Agency Labor Hours	900
Annual Agency Labor Cost	\$90,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	15,076
Total Cost (Respondents plus Agency)	\$943,689
Subsequent Reporting Years	
Number of Respondents	10,551
Total Annual Responses	63,740
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	7,142
Respondent Hours per Response	0.11
Annual Respondent Labor Cost	\$430,108
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$430,108
Total Agency Labor Hours	400
Annual Agency Labor Cost	\$40,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	7,542
Total Cost (Respondents plus Agency)	\$470,108

6(g) Burden Statement

Approximately 10,600 facilities will incur 14,200 hours and \$850,000 in the first year and 7,100 hours and \$430,000 in subsequent years. Costs are approximately \$81 per facility in the first year and \$41 per facility in subsequent years. The annual public reporting and recordkeeping burden for this collection of information is estimated to average less than one hour 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 gather the following information: name, address, and ownership status of a facility's highest level US parent company; and the facility's primary North American Industry Classification System (NAICS) codes and whether or not reported emissions include those from a cogeneration unit. If a facility has more than one owner, the facility also must report the address and percent of facility ownership for each parent company.

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.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2008-0508-056, which is available for online viewing at www.regulations.gov, or in person viewing at the Air Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2008-0508-056 and OMB Control Number 2060-NEW in any correspondence.

Table 6.3b Average Annual Burden and Cost

Number of Respondents	10,551
Total Annual Responses	63,740
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	9,487
Respondent Hours per Response	0.15
Annual Respondent Labor Cost	\$571,302
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$571,302
Total Agency Labor Hours	567
Annual Agency Labor Cost	\$56,667
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	10,054
Total Cost (Respondents plus Agency)	\$627,968