SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised), EPA ICR Number 2438.02, OMB Control Number 2060-0672.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Onshore Natural Gas Processing Plants, published at 40 CFR part 60, subpart KKK, were proposed on January 20, 1984, and promulgated on June 24, 1985. These standards apply to the following affected facilities located at onshore natural gas processing plants: compressors in equipment leaks of Volatile Organic Compound (VOC) service or in wet gas service, and the groups of all equipment (except compressors) within a process unit. Affected facilities commenced construction, modification, or reconstruction after the date of proposal. A process unit is defined as the equipment assembled for extraction of natural gas liquids from field gas, fractionation of liquids into natural gas products, or other processing of natural gas products. This information is being collected to assure compliance with 40 CFR part 60, subpart KKK.

The New Source Performance Standards (NSPS) for Onshore Natural Gas Processing - SO_2 Emissions- (0 CFR part 60, subpart LLL) were proposed on January 20, 1984, and promulgated on October 1, 1985. These standards apply to the following affected facilities located at onshore natural gas processing plants: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. Affected facilities commenced construction, modification, or

reconstruction after the date of proposal. A sweetening unit is defined as a process device that separates the hydrogen sulfide and carbon dioxide (CO_2) contents from the sour natural gas stream. The provisions of subpart LLL do not apply to sweetening facilities that produce acid gas that is completely re-injected into oil or gas bearing geologic strata or that is otherwise not released to the atmosphere. The control and monitoring requirements of subpart LLL do not apply to affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide in the acid gas, expressed as sulfur. This information is being collected to assure compliance with 40 CFR part 60, subpart LLL.

As part of the mandatory review of NSPS as required under the Clean Air Act, the requirements of both subpart KKK and LLL would be contained in a new subpart, 40 CFR 60, subpart OOOO. Subpart OOOO will supersede subpart KKK, and the existing provisions of subpart KKK and LLL would be included in the new subpart OOOO along with the new proposed provisions. The revisions to this ICR account for the reduction in new sources estimated that will report under KKK and LLL (new sources will now report under the ICR for subpart OOOO). This ICR accounts for the existing burden for sources still reporting under KKK and LLL. We have also updated labor cost estimates and removed all instances of recording and reporting due to start-up, shutdown and malfunction.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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.

Based on our consultations with industry representatives, there is an average of four

affected facilities at each plant site for subpart KKK, along with one affected facility at each plant site for subpart LLL, and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

All of these sources subject to subpart LLL are also subject to subpart KKK. Over the next three years, an average of 507 sources per year will be subject to subpart KKK. Approximately 70 of the 507, are also currently subject to subpart LLL.

None of the plants in the United States are owned by neither state, local, tribal, or the Federal government. They are all owned and operated solely by privately owned for-profit businesses. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised). The burden to the "Federal government" is attributed entirely to work performed by Federal employees or government contractors; this burden may be found in Table 2: Annual Agency Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

> **. . .** application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner or 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, VOC and sulfur dioxide emissions from onshore natural gas processing plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subparts KKK and LLL.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required semiannual and quarterly 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

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

EPA will provide public notice of this ICR by means of a Federal Register Notice of Final Rulemaking.

3(c) Consultations

During the previous ICR renewal, several consultations were conducted during a previous renewal of this ICR. In estimating the affected number of sources and the growth rate of onshore natural gas processing plants subject to this standard, EPA contacted Ms. Lynn Reed at (918) 588-7380, ONEOK, Incorporated, Mr. Lance Lodes at (405) 557-6846, OGE-Enogex, Incorporated, and Mr. Johnny Dreyer, (918) 493-3872, Gas Processors Association (GPA). These contacts, in turn, consulted a limited number of its members. Additionally, we reviewed information available from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate. It was determined that an average of 507 facilities per year will be subject to the standard over the next three years. Since this revision is removing new sources subject to KKK in order to account for them under subpart OOOO, no further contacts were made.

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.

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 onshore natural gas processing plants. The North American Industry Classification System (NAICS) codes 211111 and 211112 for onshore natural gas processing plants.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the New Source Performance Standards for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL).

A source must make the following reports:

Notifications	
Semiannual reports of excess emissions (subparts KKK and LLL)	60.7(c)
Performance test results (subparts KKK and LLL)	60.8(a), 60.636(a), 60.487(e)
Semiannual reports (subpart KKK)	60.636(a)-(c), 60.487(a)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms (subpart LLL)	60.647(b)

A source must keep the following records:

Recordkeeping	
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems.	60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect (subpart KKK).	60.632(a), 60.482-10(l)(1), (2)
Keep records of inspections of closed vent systems during which no leaks are detected (subpart KKK).	60.632(a), 60.482-10(l)(4), (5)
Perform attachment of identification numbers to leaking equipment (subpart KKK).	60.635(a), (b)
Keep records of leak detection and repair (subpart KKK).	60.632(a), 60.635(a), (b), 60.482-10(l)(3) 60.486(c)
Keep records of design requirements for and operation of closed vent systems and control devices (subpart KKK).	60.635(a), 60.486(d)
Keep records listing all equipment subject to subpart KKK.	60.635(a), (b), 60.486(e)
Keep records of compliance tests (subpart KKK).	60635(a), 60.486(e)(4)

Recordkeeping	
Keep records of valves designated as unsafe or difficult to monitor (subpart KKK).	60.635(a), 60486(f)
Keep records of design criterion that indicate failure (subpart KKK).	60.635(a), 60.486(h)
Keep records of parts not in VOC service or otherwise exempt (subpart KKK).	60.635(a), (c), 60.486(j)
Keep records of calculations and measurements (subpart LLL).	60.647(a)
Facilities that choose to comply with 60.646(e) shall keep, for the life of the facility, records demonstrating that the facility design capacity is less that 150 long tons per day (LT/D) of hydrogen sulfide expressed as sulfur (subpart LLL).	60.647(d)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
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.
Transmit, or otherwise disclose the information.
Perform initial performance test, reference the methods discussed in the rule language, and repeat performance tests if necessary. Applicable if controls are used (subpart KKK).
Monitor control devices to ensure that they are operated and maintained in conformance with design. Applicable if controls are used (subpart KKK).
Perform monthly monitoring of pumps in light liquid service and valves in gas/vapor service or in light liquid service (subpart KKK).
Repair pump, compressor, valve, and vapor collection system leaks (subpart KKK).
Perform weekly visual inspections of pumps in light liquid service (subpart KKK).
Monitor pressure relief devices in gas/vapor service for no detectable emissions, following pressure release (subpart KKK).
Monitor or repair leaks in pumps or valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and connectors (subpart KKK).
Conduct annual inspections of vapor collection systems (subpart KKK).
Install, calibrate, maintain and operate CMS for: (a) total sulfur emission rate; and (b) exhaust gas temperature for oxidation control systems or reduction control systems that are followed by an incinerator (subpart LLL).

Respondent Activities
Install, calibrate, maintain, and operate CMS for reduced sulfur compound emission rate for reduction control systems that are not followed by an incinerator (subpart LLL)
Perform initial performance test, reference the methods discussed in the rule language, and repeat performance tests if necessary (subpart LLL).
Perform daily monitoring of: (a) accumulation of sulfur product; and (b) H_2S concentration in the acid gas from the sweetening unit (subpart LLL).
Perform hourly monitoring of acid gas flow rate from the sweetening unit and calculate the daily average (subpart LLL).
Calculate: (a) daily sulfur feed rate; and (b) daily required SO_2 emission reduction efficiency (subpart LLL).

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 CDX

5(b) Collection Methodology and Management

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. Information contained in the reports will be required to submit records electronically to EPA's Central DATA Exchange (CDX) using the Electronic Reporting Tool. CDX enables fast, efficient and more accurate environmental data submissions from state and local governments, industry and tribes to the EPA and participating program offices. EPA's CDX is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data

submissions to the Agency. CDX works with both EPA program offices looking for a way to better manage incoming data, and stakeholders looking for a way to reduce burden from reporting requirements.

The records required by this regulation must be retained by the owner/operator for two years. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). After reviewing relevant available background documents related to the standard, an estimate of the number of small entities affected could not be determined. 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 in below Table 1: Annual Respondent Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (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 each of the subparts 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.

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 109,327 labor hours. The recordkeeping hours shown below in Table 1 are 61,959. The reporting requirement hours shown below in Table 1 are 47,368. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	$116.05 ($55.26 + 110%)
Technical	$97.21 ($46.29 + 110%)
Clerical	$48.87 ($23.27 + 110%)

These rates are from the U. S. Department of Labor, Bureau of Labor Statistics, March 2010, "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 only costs to the regulated industry resulting from information collection activities required by subpart KKK are labor costs. There are no capital/startup or operation and maintenance costs.

The type of industry costs associated with the information collection activities in subpart LLL 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 monitor 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×C)	(E) Annual O&M Costs for One Respondent [a]	(F) Number of Respondents with O&M [b]	(G) Total O&M, (E×F)
SO_2 CEM, control outlet (only for subpart LLL)	$73,000	0	0	$17,100	4	$68,400

Assumptions:

[a] Costs reflect installation and maintenance of an in-situ SO_2 CEM after the control device and assume installation occurred during the construction of the facility.

[b] We expect four existing facilities to have annual O & M costs for monitoring under subpart LLL.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $68,400. This is the total of column G.

(iv) Affirmative Defense/Root Cause Analysis/Malfunction Costs.

The EPA's estimate for an affirmative defense and root cause analysis in the table is based on general experience to calculate the time and effort required of a source to review relevant data, interview plant employees, and reconstruct the events prior to a malfunction in order to determine primary and contributing causes. The level of effort also includes time to produce and retain the report in document form so that the source will have it available should EPA or state enforcement agencies ever request to review it.

The labor rates used for these costs 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.

Personnel	Number of Personnel	Time Requirement (hours)	Total Hours	Hourly Rate ($/hr)	Total
Technical Personnel	3	6	18	$98.20	$1,768
Managerial Personnel	2	6	12	$114.49	$1,374
Total	5		30		$3,141

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 overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be

$420,400.

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 Agency Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (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 507 existing respondents will be subject to the standard. It is estimated that an additional one respondent per year will become subject to subpart KKK and three for subpart LLL over the next three years. The overall average number of respondents, as shown in the table below is 507 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			
Year	(A) Number of Existing Respondents	(B) Number of Existing Respondents that would now Report under Subpart OOOO [a]	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Respondents (D=A-B-C)
Subpart KKK				
1	561	27	0	534
2	534	27	0	507
3	507	27	0	480
Average	534	27	0	507
Subpart LLL [b]				
1	79	3	3	73
2	76	3	3	70
3	73	3	3	67
Average	76	3	3	70

Assumptions:
a. In this standard, existing respondents submit initial notifications. New sources for the same affected facilities report under subpart OOOO. We expect 27 of the existing facilities to undergo modifications in each year , which would indicate these facilities would report under subpart OOOO and no longer report under subpart KKK. For subpart LLL, we expect three facilities to perform a modification and report under subpart OOOO.
b. Affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide (H2S) in the acid gas, expressed as sulfur, have no reporting requirements pursuant to subpart LLL. Three respondents have sources capacities below this threshold.

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 507. This includes the 70 respondents that also report under subpart LLL because all sources subject to LLL are also subject to subpart KKK.

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 include a report for LLL with their report for KKK	(E) Total Annual Responses E = (B×C)
Subpart KKK and LLL				
Semiannual reports	507	2	70	1,014
Affirmative Defense	2	1	N/A	2
TOTAL (rounded)				1,016

N/A – Not Applicable.

The number of Total Annual Responses is 1,016.

The total annual labor costs are $10,258,245. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL)(Revised).

6(e) Bottom Line 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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 109,327. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 108 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $68,400. The cost calculations are detailed above 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 9,329 labor hours at a cost of $420,400. See below Table 2: Annual Agency Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised).

6(f) Reasons for Change in Burden

The change in burden results from the development of subpart OOOO, which supersedes both subpart KKK and LLL. Any new or modified affected facility will begin reporting under subpart OOOO instead of subpart KKK and LLL.

The EPA also provides an adjustment to this ICR that estimates the costs of the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. The EPA's estimate for the required notification, reports and records, including the root cause analysis, associated with a single incident totals approximately $3,141 and is based on the time and effort required of a source to review relevant data, interview plant employees, and document the events surrounding a malfunction that has caused an exceedance of an emission limit. The estimate also includes time to produce and retain the records and reports for submission to the EPA. For the purpose of estimating the annual burden, the EPA is attributing a total of 6 instances of affirmative defense over a 3 year period across all sources in the category. The EPA is using this frequency of 6 events in 3 years, because of the number of excess emission events reported by source operators, only a small number would be expected to result from a malfunction, and only a subset of excess emissions caused by malfunctions would result in the source choosing to assert the affirmative defense. Thus we believe the number of instances in which source operators might be expected to avail themselves of the affirmative defense will be extremely small.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 108 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 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-OAR-2010-0505. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2010-0505 and OMB Control Number 2060-0672 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, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Reporting/ Recordkeeping Requirements	**Person-hours per occurrence**	**No. of occurrences per respondent per year**	**Person-hours per respondent per year (C = A×B)**	**Respondents per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	**Cost ($) [b]**
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions								
Subpart KKK	1	1	1	507	507	25	51	$54,705
Subpart LLL	1	1	1	70	70	4	7	$7,553
B. Required activities								
Subpart KKK and LLL								
Semiannual reports d	40	2	80	507	40,560	2,028	4,056	$4,376,404
Affirmative Defense	30	1	30	2	36	24	0	$6,282
Reporting Subtotal					**41,173**	**2,081**	**4,114**	**$4,444,944**
4. Recordkeeping								

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Reporting/ Recordkeeping Requirements	**Person-hours per occurrence**	**No. of occurrences per respondent per year**	**Person-hours per respondent per year (C = A×B)**	**Respondents per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	**Cost ($) [b]**
requirements								
A. Read instructions								
Subpart KKK	See 4C							
Subpart LLL	See 3A							
B. Plan activities	See 3E							
Subpart KKK	See 4C							
Subpart LLL	N/A							
C. Implement activities	See 3E							
Subpart KKK								
Filing and maintaining records e	80	1	80	507	40,560	2,028	4,056	$4,376,404
Recalibrate monitors	4	12	4	507	2,028	101	203	$218,820
Method 21 performance evaluation	2	2	4	507	2,028	101	203	$218,820
Subpart LLL	N/A							
D. Develop								

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Reporting/ Recordkeeping Requirements	**Person-hours per occurrence**	**No. of occurrences per respondent per year**	**Person-hours per respondent per year (C = A×B)**	**Respondents per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	**Cost ($) [b]**
record system								
Subpart KKK	See 4C							
Subpart LLL	40	1	40	3	120	6	12	$12,948
E. Time to enter information f								
Subpart KKK and LLL	See 4C							
Records of continuous recording	0.5	261	131	70	9,135	457	914	$985,662
Records of capacity data	2	1	2	3	6	0.3	0.6	$647
F. Train personnel								
Subpart KKK	See 4C							
Subpart LLL	N/A							
G. Audits								
Subpart KKK	N/A							
Subpart LLL	N/A							
Recordkeeping Subtotal					**53,877**	**2,694**	**5,388**	**$5,813,301**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Reporting/ Recordkeeping Requirements	**Person-hours per occurrence**	**No. of occurrences per respondent per year**	**Person-hours per respondent per year (C = A×B)**	**Respondents per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	**Cost ($) [b]**
TOTAL ANNUAL BURDEN AND COST					**109,327**			**$10,258,245**

N/A - Not Applicable.

Assumptions:

a. We have assumed that the average number of respondents that will be subject to subpart KKK will be 507. New affected facilities will no longer report under KKK or LLL, and instead will report under subpart OOOO. It is also assumed that the average number of respondents that will be subject to subpart LLL will be 70.

b. This ICR uses the following labor rates: $116.05 per hour for Executive, Administrative, and Managerial labor; $97.21 per hour for Technical labor, and $48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "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.

c. We have assumed that each respondent will take 8 hours, two times per year to write semiannual reports.

d. We have assumed that each respondent will take 40 hours, two times per year to write semiannual reports.

e. We have assumed that each respondent will take 80 hours to file and maintain records.

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Reporting/ Recordkeeping Requirements	**Person-hours per occurrence**	**No. of occurrences per respondent per year**	**Person-hours per respondent per year (C = A×B)**	**Respondents per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	**Cost ($) [b]**

f. We have assumed that each respondent will take 40 hours to develop record system.

g. We have assumed continuous monitoring occurs for 0.5 hours on the approximate number of business days.

Table 2: Annual Agency Burden and Cost, NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Revised)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Activity	**EPA person-hours per occurrence**	**No. of occurrences per plant per year**	**EPA person-hours per plant per year (C = A×B)**	**Plants per year [a]**	**Technical person-hours per year (E = C×D)**	**Management person-hours per year (E×0.05)**	**Clerical person-hours per year (E×0.1)**	Cost ($) [b]
Subpart KKK and LLL								
Review semiannual reports [e]	8	2	16	507	8,112	406	811	$420,400
TOTAL ANNUAL BURDEN					**9,329**			**$420,400**

Assumptions:

a. We have assumed that the average number of respondents that will be subject to subpart KKK will be 507. New affected facilities will no longer report under KKK or LLL, and instead will report under subpart OOOO. It is also assumed that the average number of respondents that will be subject to subpart LLL will be 70.

b. The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of $62.27 (GS-13, Step 5, $38.92 × 1.6), Technical rate of $46.21 (GS-12, Step 1, $28.88 × 1.6), and Clerical rate of $25.01 (GS-6, Step 3, $15.63 × 1.6). These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay.