

**SUPPORTING STATEMENT PART A:
INFORMATION COLLECTION REQUEST
FOR THE
GREENHOUSE GAS REPORTING PROGRAM**

**OMB Control No. 2060-0629
EPA ICR No. 2300.10**

May 2013

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**SUPPORTING STATEMENT
FOR THE GREENHOUSE GAS REPORTING PROGRAM
EPA ICR # 2300.10**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

TITLE: "Information Collection Request for the Greenhouse Gas Reporting Program (GHGRP)."

ICR Number: 2300.10

OMB Control Number: 2060-0629

1(b) Short Characterization/Abstract

In response to the FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110-161) and under authority of the Clean Air Act (CAA), EPA finalized a greenhouse gas reporting rule in October of 2009 (henceforth referred to as the Greenhouse Gas Reporting Program or GHGRP) (74 FR 56260; October 30, 2009). The Rule, which became effective on December 29, 2009, requires reporting of greenhouse gases (GHGs) from certain facilities and suppliers. It does not require control of greenhouse gases. Instead, it requires that sources emitting above certain threshold levels of carbon dioxide (CO₂) equivalent (CO₂e) monitor and report emissions.

Subsequent rules provide corrections and clarification on existing requirements (e.g., modify reporting deadlines, amend calculation methodologies and data reporting requirements, clarify rule provisions and compliance obligations, and correct technical and editorial errors); include requirements for additional facilities suppliers, and mobile sources; require reporters to provide information about parent companies, North American Industry Classification System (NAICS) code(s), and whether emissions are from cogeneration; and finalize confidentiality business information (CBI) determinations.

The Office of Management and Budget's (OMB's) approval of the Information Collection Request (ICR) for the GHG Reporting Rule expires on November 30, 2012. The purpose for this ICR is to renew and revise the GHG Reporting Rule ICR to update and combine the burdens and costs imposed by all of the current ICRs under the GHGRP. Appendix A summarizes the ICRs associated with the GHGRP.

There is a decrease of 726,202 hours and \$36,517,000 in the total estimated respondent burden compared with that identified in the ICRs associated with the GHGRP currently approved by OMB. This decrease reflects the completion of one-time activities that occurred in the first year of data collection and a reduction in the number of respondents. This change is the result of a program adjustment.

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 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 Section 821” of the 1990 CAA amendments.

Sections 114 and 208 of the Clean Air Act (CAA) provide EPA authority to require the information mandated by the Greenhouse Gas Reporting Program (GHGRP) because such data will inform and are relevant to future policy decisions. CAA section 114(a)(1) authorizes the Administrator to require emissions sources, persons subject to the CAA, or persons whom the Administrator believes may have necessary information to monitor and report emissions and provide such other information the Administrator requests for the purposes of carrying out any provision of the CAA (except for a provision of title II with respect to manufacturers of new motor vehicles or new motor vehicle engines). Section 208 of the CAA provides EPA with similar authority regarding the manufacturers of new motor vehicles or new motor vehicle engines, and other persons subject to the requirements of parts A and C of title II. 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.

Because EPA does not yet know the specific policies that will be adopted, the data reported under the GHGRP is of sufficient quality to inform policy and program development. The requirements in the GHGRP maximize the amount of emissions reported while excluding small emitters and are consistent with existing GHG reporting programs in order to reduce reporting burden for all parties involved. Also, consistent with the Appropriations Act, the GHGRP covers a broad range of sectors of the economy.

2(b) Practical Utility/Users of the Data

The GHGRP collects information from facilities that directly emit GHGs and from suppliers of products that release GHGs if combusted, oxidized, or used. The comprehensive GHG data reported directly from large facilities and suppliers across the country are now easily

accessible to the public at: <http://ghgdata.epa.gov/ghgp/main.do>. Reporting entities use uniform methods for estimating emissions, which enables data to be compared and analyzed. EPA's online data publication tool allows users to view and sort GHG data for calendar year 2010 from over 6,000 entities in a variety of ways, including by location, industrial sector, and the type of GHG emitted.

Data collection in the GHGRP complements the Inventory of U.S. Greenhouse Gas Emissions and Sinks (Inventory) and can help EPA transition to use of the 2006 Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories. EPA presented the GHGRP dataset in the most recent Inventory (published in April 2012).

Transparent, public data on emissions allows for accountability of polluters to the public stakeholders who bear the cost of the pollution. This powerful data resource provides a critical tool for communities to identify nearby sources of GHGs and provide information to state and local governments.

The standardization of GHG data provides businesses with the necessary information to benchmark themselves against similar facilities, better understand their relative standing within their industry, and achieve and disseminate their environmental achievements. Businesses and other innovators can use the data to determine their GHG footprints, find cost- and fuel-saving efficiencies that reduce greenhouse gas emissions (e.g., through energy audits or other forms of assistance), and foster technologies to protect public health and the environment.

The facility-specific GHG emissions data improve the understanding of the factors that influence GHG emission rates as well as the actions that facilities take to reduce emissions. The facility-based data can be aggregated to the corporate level in order to track emission trends from industries, within industries, and across industries over time, particularly in response to policies and potential regulations.

Information collected from the oil and gas facilities (in subpart W) and CO₂ injection facilities (in subparts RR and UU) allows EPA to gain a better understanding of the entire CO₂ capture and sequestration (CCS) system.

Information collected from fluorocarbons allows EPA to assess the overall volume and importance of compounds for which global warming potentials (GWPs) have not been evaluated and help identify which compounds should have their GWPs evaluated first. In addition, historical reports in tons of chemical can be converted into CO₂e, provided GWPs have been identified for these compounds. Without this comprehensive reporting requirement, such historical information could be lost.

The GHGRP is not intended to be a survey and the respondents affected by the program are not intended to be a statistical sample of a larger universe of entities. EPA does not intend to use the data collected under the GHGRP to characterize non-reporting entities or to draw statistical inferences about a larger population.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

EPA evaluated existing GHG programs and the GHG data currently available to determine whether this request duplicates other information collections. In developing the GHGRP, EPA reviewed monitoring methods including:

- Federal programs within the United States, such as the Inventory, the U.S. Department of Energy's (DOE's) Energy Information Administration's (EIA's) 1605b program, the Acid Rain Program, EPA Natural Gas STAR Program, and voluntary GHG partnership programs;
- State and regional GHG reporting programs, such as The Climate Registry, the Regional Greenhouse Gas Initiative, the Western Regional Air Partnership, and programs in several states including California, New Mexico, Connecticut, and New Jersey;
- Reporting protocols developed by nongovernmental organizations, such as the World Resources Institute/World Business Council for Sustainable Development; and
- Programs from industrial trade organizations, such as the Interstate Natural Gas Association of America's GHG Emission Estimation Guidelines, the American Petroleum Institute's Compendium of GHG Estimation Methodologies for the Oil and Gas Industry, and the World Business Council for Sustainable Development's Cement Sustainability Initiative's CO₂ Accounting and Reporting Standard for the Cement Industry.

These are important programs that not only led the way in reporting of GHG emissions before the federal government acted but also assisted in quantifying the GHG reductions achieved by various policies. Many of these programs collect different or additional data as compared to the GHGRP. For example, state programs may establish lower thresholds for reporting, request information on areas not addressed in the GHGRP, or include different data elements to support other programs (e.g., offsets). While some programs collect similar information on GHG emissions, the Agency has determined that the GHGRP supplements and complements, rather than duplicates, existing programs' data. Further, EPA has made significant efforts over the past 4 years to facilitate the reporting in the event a single entity has to report both the federal and state level. For example, EPA has supported efforts by the California Air Resources Board to harmonize the reporting of information under California's Global Warming Solutions Act, AB32 with EPA's GHGRP. The product of the collaboration is referred to as California Electronic Greenhouse Gas Reporting Tool, or Cal e-GGRT.

Documentation of EPA's review of GHG monitoring protocols used by federal and state voluntary and mandatory GHG programs as well as GHG reporting rules can be found in the

docket at EPA-HQ-OAR-2008-0508-056. For further discussion on the relationship of the GHGRP to other programs, please refer to the preambles of each of the GHGRP rulemakings, the June 6, 2008 memorandum entitled Review of Existing Programs (which can be found in the docket at EPA-HQ-OAR-2008-0508-0052), and the January 27, 2009 memorandum entitled Review of Existing State Greenhouse Gas Reporting Rules (which can be found in the docket at EPA-HQ-OAR-2008-0508-0054). Some GHG programs are described below:

- A number of EPA's voluntary partnership programs include a GHG emissions and/or reductions reporting component (e.g., Natural Gas STAR program, etc.). However, the GHGRP has much broader coverage than the voluntary programs and therefore helps EPA learn more about emissions from facilities not included in current programs.
- EPA considered CO₂ data currently collected under Section 821 of the 1990 CAA Amendments. To avoid duplication and because the Acid Rain program already requires reporting of high quality CO₂ data from electrical generating units (EGUs), the GHGRP allows for use of the same CO₂ data rather than requiring additional reporting of CO₂ from EGUs. Facility operators do, however, have to report the emissions of GHGs that are not included under Section 821, such as methane (CH₄) and nitrous oxide (N₂O).
- EPA reviewed the Inventory, which is an annual comprehensive top-down assessment of national greenhouse gas emissions. While the Inventory is generally compiled from national surveys (i.e., not broken down at the geographic or facility level), the GHGRP focuses on bottom-up data from individual facilities that exceed appropriate thresholds. The bottom-up approach to data collection in the GHGRP can help reduce uncertainty in emissions estimates for specific industries, and more broadly, helps EPA transition to use of the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, which will be required to meet international reporting obligations under the United Nations Framework Convention on Climate Change in the near future.
- EPA published the Federal Requirements Under the Underground Injection Control (UIC) Program for Carbon Dioxide Geologic Sequestration (GS) Wells Final Rule (henceforth referred to as the "GS Rule") (75 FR 77230, December 10, 2010). EPA determined that the GHGRP is complementary to and builds on EPA's UIC permit requirements. Requirements under the UIC program are focused on demonstrating that underground sources of drinking water are not endangered as a result of CO₂ injection into the subsurface, while requirements under the GHGRP through subpart RR enable reporters to quantify the amount of CO₂ that is geologically sequestered. For example, the UIC Class VI permit (including the Testing and Monitoring Plan) and subpart RR's monitoring, reporting, and verification plan have separate monitoring objectives.
- EPA reviewed the Internal Revenue Service (IRS) Notice 2009-83 Credit for Carbon Dioxide Sequestration under Section 45Q. To claim the credit, a taxpayer must follow general monitoring and verification principles, calculate CO₂ sequestered in the fiscal

year using a mass-balance equation, and report to IRS the amount of qualified CO₂ sequestered in the fiscal year. However, the level of reporting and transparency of the IRS data collected would not meet the verification needs of the GHGRP. The IRS reporting requirement expires after 75 million metric tons of CO₂ is reported as sequestered to IRS, data reporting is only as robust as to meet the standards in the case of an IRS audit, and the IRS does not outline procedures for quantifying and reporting any CO₂ leakage that may occur as is necessary for the rule. Therefore, EPA has concluded that the IRS data would not meet the needs outlined in the GHGRP.

As noted in the ICR for the 2009 GHG Reporting Rule, a number of programs at the state, tribal, territorial, and local level require emission sources in their respective jurisdictions to monitor and report GHG emissions. To reduce burden on reporters and program agencies, the Agency plans to share emissions data with the exception of any CBI with relevant agencies or approved entities using, where practical, shared tools, and infrastructure.

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

As part of the Federal Register notice on each of the rulemakings under the GHGRP, EPA solicited comments on the proposed rules, the estimates in the proposed ICRs, and specific aspects of the information collection, as described below:

- 1) Whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information would have practical utility;
- 2) Whether the Agency's burden estimate is accurate, including the validity of the methodology and assumptions used;
- 3) How to enhance the quality, utility, and clarity of the information to be collected; and
- 4) How to minimize the burden on respondents, including use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology.

Across all the ICRs associated with the GHGRP, EPA received only a couple of comments that specifically addressed the proposed ICRs, as follows.

EPA received one comment about the April 2010 proposed ICR for subpart W. The commenter stated that use of CAA Section 114 as the basis for the rule runs counter to its longstanding use which has been limited to issuing ICRs and that ICRs are limited to collecting data from specific sources over a discrete period of time. EPA determined that this comment confuses CAA Section 114 and ICR requirements under the Paperwork Reduction Act, 44 U.S.C. 3501, et seq.

EPA received two written comments that questioned the need for EPA to collect parent company information under the Corporate ID Rule Amendment. 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, i.e., that EPA's authority to collect information under Section 114 is limited by the requirements of Paperwork Reduction Act (5 C.F.R. 1320) under which EPA must demonstrate that the requested information has "practical utility." EPA explained that Section 114 of the CAA is sufficiently broad for EPA to collect this information.

In compliance with the Paperwork Reduction Act (44 USC 3501, et seq.), EPA solicited public comment on this GHGRP ICR for a 60-day period before it was submitted to OMB. Specifically, EPA published a notice in the Federal Register (FR) requesting comment on the estimated respondent burden and other aspects of this ICR (77 FR 28376, May 14, 2014) (see Appendix B).

EPA received one written comment about the GHGRP Renewal ICR. The commenter presented data from oil and gas sectors and asserted that EPA significantly underestimated the burden by as much as an order of magnitude or more. The commenter provided the following reasons for the underestimation of burden: EPA uses average industrial labor rates, neglects significant contributors that cause variability in burden (e.g., facility size and complexity), and miscalculated burden hours.

EPA responded in the following manner. In response to the commenter, EPA adjusted labor estimates for the oil and gas industry to reflect the higher labor costs for the industry. EPA notes that the Agency's overall methodology and assumptions were sound and relied on best available data to estimate the costs.

Overall, EPA has determined that the cost estimates provided by the commenter do not take into consideration the completion of one-time activities that occurred in the first year of data collection. The commenter is providing cost estimates for the 2010 and 2011 reporting years. These cost estimates are directly comparable to cost estimates EPA made for the 2010 and 2011 reporting year ICRs. In EPA's cost estimates, EPA assumed the startup costs would be incurred during the first year of reporting. For Subpart W, the first year of reporting is the 2011 reporting year. In the renewal ICR, EPA is not including the startup costs for the 2013 through 2015 reporting years because the startup costs should already be assumed by the facility. Even in cases of facilities using BMM, startup costs should be assumed prior to the 2013 reporting year. These costs will include the labor burden of planning, registration, and installing required equipment to comply with the rule. In comparing the commenter's cost estimates to EPA's cost estimates for the 2010 and 2011 reporting year, EPA finds that the commenter's cost estimates are comparable to EPA's cost estimate. Even for facilities that used BMM, it is expected that the majority of the startup costs would occur within the first couple years of reporting. As the startup costs were already included in the 2011 model year ICR costs, EPA finds that it would be duplicative to include the startup costs for the 2013 reporting year and beyond. While it is possible that facilities will apply for BMM for 2013 and beyond, EPA anticipates that the use of BMM in 2013 and beyond would not result in a burden increase.

EPA's estimate of labor hours is based on previous analyses of the costs of monitoring, reporting, and recordkeeping for other rules; information from the industry characterization on the number of units or process inputs and outputs to be monitored; and engineering judgment by industry and EPA industry experts and engineers. While the commenter provided a general

categorization of the size of facilities in each segment, the cost estimates were only provided at the facility level, and EPA cannot evaluate if the facilities are representative of the industry as a whole. While the costs provided by the commenter are in some cases significantly higher than EPA's estimates, EPA is unable to determine from the commenter's submitted data what costs are incurred as a result of Part 98 and what costs are the result of normal business practices.

Complete details of the cost analyses are found in the Appendix E of the Renewal ICR, the regulatory impact analysis (RIA) for the final rule, and the economic impact analysis (EIA) for Subpart W. The Technical Support Documents (TSDs) for each source category provide a discussion of the applicable measurement technologies and any existing programs and practices.

The commenter also urged EPA to consider how to reduce burden on reporters. The commenter suggested that EPA sunset the reporting program, pull back to a less frequent reporting, or use a more focused approach that centers on the most significant emitting sources.

EPA has determined that it is appropriate to gather the information on an annual basis given the strong public interest in facility level emissions data, the breadth of potential uses of the information, and the program's purpose to provide accurate and timely information to inform future policy making decisions. Should EPA find it appropriate to revise the reporting requirements in the future, it will occur as a result of a notice and comment rulemaking. In order to minimize burden in the future, EPA is committed to working with stakeholders to coordinate implementation of reporting programs, reduce burden on reporters, provide timely access to verified emissions data, establish mechanisms to efficiently share data, and harmonize data systems to the extent possible.

The commenter expressed other concerns, e.g., that EPA is over-reaching its authority under CAA Sections 114 and 208. EPA responded that its exercise of its authority under Sections 114 and 208 of the CAA is reasonable, relevant to the purpose, not overly broad, and not unreasonably disruptive.

The complete response to comment document can be found in the docket (EPA-HQ-OAR-2012-0333).

An additional FR notice will be published prior to submission of this GHGRP ICR to OMB. The public comment period for this additional notice is 30 days.

3(c) Consultations

In developing the GHG Reporting Rule, EPA established several Agency workgroups, conducted a proactive communications outreach program, and met with federal agencies. EPA established several Agency workgroups to develop the reporting requirements for the GHG emitting processes within each of seven categories of processes that emit greenhouse gases. These workgroups addressed: (1) Fossil Fuel Combustion: Stationary, (2) Fossil Fuel Combustion: Mobile, (3) Fuel Suppliers, (4) Industrial Processes, (5) Industrial GHG Suppliers, (6) Fossil Fuel Fugitive Emissions, and (7) Biological Processes. An eighth workgroup developed the electronic data reporting system. The Climate Change Division within the Office of Atmospheric Programs coordinated the eight workgroups.

Prior to developing the proposed 2009 rule, each of the workgroups performed a comprehensive review of existing voluntary and mandatory GHG reporting programs, as well as guidance documents for quantifying greenhouse gas emissions from specific sources. A list of these reviews can be found in Section 3(a) above. The workgroups also reviewed international programs, including the IPCC, the EU Emissions Trading System, the Australian GHG Reporting System, and the Canadian Mandatory Greenhouse Gas Reporting Program.

In reviewing these programs, EPA analyzed the sectors covered, reporting thresholds, monitoring or emissions estimating methods used, quality assurance measures, the point of monitoring, data input needs, and information that respondents must report or retain.

During the development of the GHG Reporting Rule, EPA conducted a proactive communications outreach program to inform the public about the rule development effort. Prior to the proposal signature, EPA staff held more than 100 meetings with stakeholders, including:

- Trade associations and firms in potentially affected industries/sectors;
- State, local, and tribal environmental control agencies and regional air quality planning organizations;
- State and regional organizations already involved in GHG emissions reporting, such as The Climate Registry, California Air Resources Board, and the Western Climate Initiative; and
- Environmental groups and other nongovernmental organizations.

EPA also met with federal agencies, including DOE and the U.S. Department of Agriculture, which have programs relevant to GHG emissions.

After the proposed GHG Reporting Rule was signed on March 10, 2009 (74 FR 16448; April 10, 2009), EPA held two public hearings, received approximately 16,800 written public comments, and met with over 4,000 people and 135 groups. Details of these meetings are available in the docket (EPA-HQ-OAR-2008-0508).

EPA has been continuously updating the GHGRP and providing technical corrections based on feedback. Specifically, EPA has been working closely with owners and operators of facilities subject to the GHGRP to communicate reporting requirements. Through these discussions, EPA has identified specific sections of the GHGRP that were either not clear or did not have the intended effect. EPA has amended specific provisions to resolve issues raised during implementation and to correct technical and editorial errors that have been identified since publication. Some of these amendments affected burden, but most amendments reduced burden or did not affect it.

In addition to correcting and clarifying existing requirements, EPA has amended the GHGRP in other ways based on public comments and stakeholder feedback, e.g., promulgated rulemakings that re-propose certain subparts, added requirements for new facilities and suppliers, and added reporting requirements that provide information about parent companies. Each action has had separate ICRs as noted in Appendix A.

As noted in Section 3(b) above, EPA received one written comment about the GHGRP Renewal ICR as part of the public notice required prior to ICR submissions to OMB. In addition, as part of the required consultations, EPA contacted four reporters and asked for feedback on the supporting statement. EPA contacted Carter Kelly of Waste Management, Niki Wuestenberg of Republic Services, Nicole Roper of PCS Nitrogen, and Lorraine Anderson of Shell Chemical. We did not receive feedback from either PCS Nitrogen or Shell Chemical. Waste Management and Republic Services both provided feedback.

The feedback we received generally indicated that these companies believed the cost estimates provided by EPA were too low. The major factor influencing the cost from both companies was the frequency of monitoring required for estimating emissions from Municipal Solid Waste Landfills (Subpart HH). EPA disagrees with the feedback provided. In making the cost estimates, EPA assumes that the operators will pick the lowest cost operations for monitoring emissions. Part of this assumption includes that landfill operators will be visiting the landfills at least once a week under normal operation to check on and maintain equipment. The majority of landfills in the US are active, and would not require additional visits to monitor emissions. Neither Waste Management nor Republic Services provided feedback on what percent of facilities required traveling to take weekly measurements, therefore EPA was unable to update the costs using best information. It was also not clear from the feedback what proportion of landfills are required to do weekly monitoring. In addition, higher than estimated cost estimates were provided on the time it takes to submit e-GGRT reports. During the first year of reporting EPA estimated a higher burden to compile and QA annual reports, but for the future submissions, EPA anticipates that companies will be more efficient in submitting reports as well as the reports having fewer errors and this is reflected in the renewal ICR. As a result, EPA is not changing the cost estimates for the ICR based on the received feedback.

The feedback we received also urged EPA to consider how to reduce burden on reporters. EPA is committed to working with stakeholders to coordinate implementation of reporting programs, reduce burden on reporters, provide timely access to verified emissions data, establish mechanisms to efficiently share data, and harmonize data systems to the extent possible.

3(d) Effects of Less Frequent Collection

The reporting frequency for emissions data to EPA has been established to minimize the burden on owners and operators of affected facilities, while ensuring that the GHGRP collects facility-specific data of sufficient quality to achieve the Agency's objectives. The GHGRP requires annual reporting, except for a limited number of facilities that are already subject to more frequent reporting requirements.

EPA recognizes that the highest level U.S. 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 U.S. parent company, primary product(s), activity(s), or service(s) change, 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 necessary information.

EPA needs the data quickly at the beginning of every reporting year in order to electronically verify it, publish it as authorized by the CAA, and use it for the purposes described. 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.

3(e) General Guidelines

This collection of information is consistent with all OMB guidelines under 5 CFR 1320.6. However, although the GHGRP generally has a 3 year requirement for record retention, in limited cases the GHGRP requires that facilities retain records for longer than the 3 year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of the OMB regulations implementing the Paperwork Reduction Act. This is because facilities or suppliers that have emissions or products with emissions less than 25,000 metric tons CO₂e/year for five years in a row or less than 15,000 metric tons CO₂e/year for three years in a row may cease reporting. Those that cease reporting must have records to cover those consecutive years of emissions and must retain such records for three years following the year that reporting was discontinued. EPA selected these two time frames and reporting thresholds because it allows these facilities or suppliers 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 the additional three years of recordkeeping for these respondents is needed to resolve any possible questions about past emission estimates. Thus, the additional record retention requirement of the rule adds no additional burden.

3(f) Confidentiality

Data collected under the GHGRP must be made available to the public unless the data qualify for CBI treatment under the CAA and EPA regulations. EPA typically makes CBI

determinations under the CAA on a case-by-case basis under 40 CFR 2.301. Due to the large numbers of entities reporting under the GHGRP and the large number of data reporting elements, EPA concluded that case-by-case determinations would not result in a timely release of emission data and other non-CBI data. EPA has issued guidance on what constitutes emissions data that cannot be considered CBI (956 FR 7042 –7043; February 21, 1991). EPA protects CBI in accordance with regulations in 40 CFR Chapter 1, Part 2, Subpart B.

All information submitted to the Agency for which a claim of CBI is made is safeguarded according to the final CBI determination published on May 26, 2011 (76 FR 30782). These CBI determinations conclude which data reporting elements in 40 CFR Part 98 were CBI, which were non-CBI, and which were emission data and therefore, under Section 114 of the CAA, ineligible for CBI protection. Under the special provisions for 40 CFR Part 98 data at 40 CFR 2.301(d), EPA has grouped data elements into data categories and generally made CBI determinations on a category basis for 34 source categories. These 34 source categories represent all reporting year 2010 source categories and four reporting year 2011 source categories (subparts T, FF, II and TT). Additionally, EPA finalized CBI determinations for most of the remaining data elements to be reported under nine subparts (subparts I, W, DD, II, QQ, RR, SS, TT, and UU) (77 FR 48072; August 13, 2012) and for new data elements in subpart L (77 FR 51477; August 24, 2012).

EPA has deferred the reporting deadline for data elements that are used as inputs to emissions equations to provide EPA time needed to fully evaluate and resolve issues regarding the reporting and potential release of these data (76 FR 53057; August 25, 2011). EPA has deferred the deadline for reporting some inputs to emissions equations until March 2013 and the deadline for others until March 2015 (77 FR 11039; February 24, 2012). EPA further deferred the reporting deadline for certain recently added data elements that are inputs to emission equations in subparts W, FF, and TT (77 FR 48072; August 13, 2012) and for one data element in subpart L (77 FR 51477; August 24, 2012).

3(g) Sensitive Questions

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

The respondents in this information collection include owners and operators of facilities that must report their GHG emissions to EPA to comply with the rulemaking. To facilitate the analysis, EPA has divided respondents into groups that align with the source categories identified in the rule.

This section lists the industry sectors (i.e., GHG source categories) that must participate in the GHGRP, the data items required of program participants, and the activities in which participants must engage to collect, assess, and in some cases submit the required data items.

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

Reporting facilities include, but are not limited to, those operating one or more units that exceed the CO₂e threshold for the industry sectors listed below or those in the categories in which all must report, such as petroleum refining facilities and all other large emitters listed in Table A-3 of 40 CFR 98.2(a)(1). Additionally, the GHGRP also requires reporting of certain emissions information associated with mobile sources (e.g., for permit applications or emissions control certification testing procedures).

Industry sectors are listed below by their corresponding subpart of the rule and their NAICS code for reference.

Part and Subpart	NAICS code(s)
Parts 86, 87, 89, 90, 94, 1033, 1039, 1042, 1045, 1048, 1051, 1054, 1064, 1065	481 Air transportation; 482 Rail transportation; 483 Water transportation
Part 98	
C. 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; 611 Educational services
D. Electricity Generation	221112 Fossil-fuel fired electric generating units, including units owned by federal and municipal governments and units located in Indian Country
E. Adipic Acid Production	325199 Adipic acid manufacturing facilities
F. Aluminum Production	331312 Primary Aluminum production facilities
G. Ammonia Manufacturing	325311 Anhydrous and aqueous ammonia manufacturing facilities
H. Cement Production	327310 Portland Cement manufacturing plants
I. Electronics Manufacturing	334111 Microcomputers manufacturing facilities; 334413 Semiconductor, photovoltaic cells (PV) (solid-state) device manufacturing facilities; 334419 Liquid crystal display (LCD) unit screens manufacturing facilities; 334419 Microelectromechanical devices (MEMS) manufacturing facilities
K. Ferroalloy Production	331112 Ferroalloys manufacturing facilities
L. Fluorinated GHG Production	325120 Industrial gases manufacturing facilities

Part and Subpart	NAICS code(s)
N. Glass Production	327211 Flat glass manufacturing facilities; 327213 Glass container manufacturing facilities; 327212 Other pressed and blown glass and glassware manufacturing facilities
O. HCFC-22 Production and HFC-23 Destruction	325120 Chlorodifluoromethane manufacturing facilities
P. Hydrogen Production	325120 Hydrogen manufacturing facilities
Q. Iron and Steel Production	331111 Integrated iron and steel mills, steel companies, sinter plants, blast furnaces, basic oxygen process furnace (BOPF) shops
R. Lead Production	331419 Primary lead smelting and refining facilities; 331492 Secondary lead smelting and refining facilities
S. Lime Manufacturing	327410 Calcium oxide, calcium hydroxide, dolomitic hydrates manufacturing facilities
T. Magnesium Production	331419 Primary refiners of nonferrous metals by electrolytic methods; 331492 Secondary magnesium processing plants
U. Miscellaneous Uses of Carbonate	Facilities included elsewhere
V. Nitric Acid Production	325311 Nitric acid manufacturing facilities
W. Petroleum and Natural Gas Systems	486210 Pipeline transportation of natural gas; 221210 Natural gas distribution facilities; 211 Extractors of crude petroleum and natural gas; 211112 Natural gas liquid extraction facilities
X. Petrochemical Production	32511 Ethylene dichloride manufacturing facilities; 325199 Acrylonitrile, ethylene oxide, methanol manufacturing facilities; 325110 Ethylene manufacturing facilities; 325182 Carbon black manufacturing facilities
Y. Petroleum Refineries	324110 Petroleum refineries
Z. Phosphoric Acid Production	325312 Phosphoric acid manufacturing facilities
AA. Pulp and Paper Manufacturing	322110 Pulp mills; 322121 Paper mills; 322130 Paperboard mills
BB. Silicon Carbide Production	327910 Silicon carbide abrasives manufacturing facilities
CC. Soda Ash Manufacturing	325181 Alkalis and chlorine manufacturing facilities, 212391 Soda ash, natural, mining and/or beneficiation
DD. Electrical Equipment Use	221121 Electric bulk power transmission and control facilities
EE. Titanium Dioxide Production	325188 Titanium dioxide manufacturing facilities
FF. Underground Coal Mines	212113 Underground anthracite coal mining operations; 212112 Underground bituminous coal mining operations
GG. Zinc Production	331419 Primary zinc refining facilities; 331492 Zinc dust reclaiming facilities, recovering from scrap and/or alloying purchased metals
HH. Municipal Solid Waste Landfills	562212 Solid waste landfills; 221320 Sewage Treatment Facilities

Part and Subpart	NAICS code(s)
II. Industrial Wastewater Treatment	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
JJ. Manure Management	Note: EPA will not be implementing subpart JJ of 40 CFR Part 98 using funds provided in the Consolidated Appropriations Act, 2012 (Public Law 112-74), due to a Congressional restriction prohibiting the expenditure of funds for this purpose.
LL. Suppliers of Coal-based Liquid Fuels	211111 Coal liquefaction at mine sites
MM. Suppliers of Petroleum Products	324110 Petroleum refineries
NN. Suppliers of Natural Gas and Natural Gas Liquids	221210 Natural gas distribution facilities; 211112 Natural gas liquid extraction facilities
OO. Suppliers of Industrial Greenhouse Gases	325120 Industrial greenhouse gas manufacturing facilities
PP. Suppliers of Carbon Dioxide	325120 Industrial greenhouse gas manufacturing facilities
QQ. Importers and Exporters of Pre-charged Equipment and Closed-Cell Foams	423730 Air-conditioning equipment (except room units) merchant wholesalers; 333415 Air-conditioning equipment (except motor vehicle) manufacturing; 336391 Motor vehicle air-conditioning manufacturing; 423620 Air-conditioners, room, merchant wholesalers; 443111 Household Appliance Stores; 423730 Automotive air-conditioners merchant wholesalers; 326150 Polyurethane foam products manufacturing; 335313 Circuit breakers, power, manufacturing; 423610 Circuit breakers merchant wholesalers
RR. Geologic Sequestration of Carbon Dioxide	211 Oil and gas extraction projects using CO ₂ enhanced oil and gas recovery; 211111 or 211112 Projects that inject acid gas containing CO ₂ underground; N/A CO ₂ geologic sequestration projects
SS. Electrical Equipment Manufacture or Refurbishment	33531 Power transmission and distribution switchgear and specialty transformers manufacturing facilities
TT. Industrial Waste Landfills	562212 Solid 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; 221320 Sewage treatment facilities
UU. Injection of Carbon Dioxide	211 Oil and gas extraction projects using CO ₂ enhanced oil and gas recovery; 211111 or 211112 Projects that inject acid gas containing CO ₂ underground

Part and Subpart	NAICS code(s)
Mobile Sources	333618 Heavy-duty, non-road, aircraft, locomotive, and marine diesel engine manufacturing; 336312 Small non-road, and marine spark-ignition engine manufacturing facilities; 336999 Personal watercraft manufacturing facilities; 336991 Motorcycle manufacturing facilities

4(b) Information Requested

(i) Data Items

Reporting Requirements

The GHGRP applies to certain facilities that emit GHGs and to suppliers of products that release GHGs if combusted, oxidized, or used. Applicability depends on the source categories located at the facility and, for some source categories, the emission level or production capacity. Fossil fuel and industrial GHG suppliers, motor vehicle and engine manufacturers, and facilities that emit 25,000 metric tons or more of CO₂e/year report GHG emissions data to EPA annually.

Specifically, the facilities in the source list of Table A-3 of 40 CFR 98.2(a)(1) are the large emitters and subject to an all-in threshold, in which they report emissions regardless of a CO₂e/year emissions threshold. These large emitters report all emissions from all-in emission source categories (Table A-3) as well as threshold source categories (Table A-4 of 40 CFR 98.2(a)(2) source list), stationary fuel combustion sources (subpart C), and miscellaneous use of carbonates (subpart U). Suppliers in the source list of Table A-5 of 40 CFR 98.2(a)(4) report all applicable products in Table A-5.

In addition, facilities that do not contain sources listed in Table A-3, but that emit at least 25,000 metric tons CO₂e/year in combined emissions from stationary combustion sources and other sources listed in Table A-4 report emissions from stationary fuel combustion sources (subpart C), miscellaneous use of carbonates (subpart U), and all applicable source categories listed in Table A-4. Facilities with only combustion emissions that emit at least 25,000 metric tons CO₂e/year are only required to report emissions from combustion sources.

Respondents comply with the following categories of requirements (if applicable): the General Provisions applicable to all sources; stationary combustion; and requirements applicable to other specific source categories identified in subparts D through UU of the rule. In addition, vehicle and engine manufacturers subject to the requirements of CFR parts 86, 87, 89, 90, 94, 1033, 1039, 1042, 1045, 1048, 1051, 1054, and 1065 report CO₂, N₂O, and CH₄ emissions associated with the mobile sources that they produce.

The following is a summary of the information requested by source category; requirements that apply to specific sources are found in Appendix C (reporting requirements) and Appendix D (recordkeeping requirements).

General requirements that apply to all sources. All respondents that exceed the reporting threshold or that belong to a source category in which all respondents report submit the following information electronically:

1. Facility name or supplier name (as appropriate), and physical street address of the facility or supplier, including the city, State, and zip code.
2. Year and months covered by the report;
3. Date of submittal;
4. For facilities, except as otherwise provided in 40 CFR 98.3(c)(12), annual emissions of CO₂, CH₄, N₂O, and each fluorinated GHG (as defined in 40 CFR 98.6) as follows:
 - a. Annual emissions (excluding biogenic CO₂) aggregated for all GHG from all applicable source categories and expressed in metric tons of CO₂e calculated using Equation A-1 provided in subpart A;
 - b. Annual emissions of biogenic CO₂ aggregated for all applicable source categories, expressed in metric tons;
 - c. Annual emissions from each applicable source category, expressed in metric tons of each GHG listed as follows: i) Biogenic CO₂; ii) CO₂ (excluding biogenic CO₂); iii) CH₄; iv) N₂O; and v) Each fluorinated GHG (including those not listed in Table A-1 of subpart A).
 - d. Except as provided in 40 CFR 98.2(c)(4)(vii), emissions and other data for individual units, processes, activities, and operations as specified in the “Data reporting requirements” section of each applicable subpart.
 - e. Emissions and other data for individual units, processes, activities, and operations as specified in the “Data reporting requirements” section of each applicable subpart.
 - f. Indicate (yes or no) whether reported emissions include emissions from a cogeneration unit located at the facility.
 - g. When applying 40 CFR 98.2(c)(4)(i) to fluorinated GHGs, calculate and report CO₂e for only those fluorinated GHGs listed in Table A-1 of subpart A.
 - h. The owner or operator of a facility is not required to report the data elements specified in Table A-6 of subpart A for calendar years 2010 through 2011 until March 31, 2013. The owner or operator of a facility is not required to report the data elements specified in Table A-7 of subpart A for calendar years 2010 through 2013 until March 31, 2015.
5. For suppliers, annual quantities of CO₂, CH₄, N₂O, and each fluorinated GHG (as defined in 40 CFR 98.6) that would be emitted from combustion or use of the products supplied, imported, and exported during the year. Calculate and report quantities at the following levels:
 - a. Total quantity of GHG aggregated for all GHG from all applicable supply categories in Table A-5 of subpart A and expressed in metric tons of CO₂e calculated using Equation A-1 of subpart A. For fluorinated GHGs, calculate and report CO₂e for only those fluorinated GHGs listed in Table A-1 of subpart A;
 - b. Quantity of each GHG from each applicable supply category in Table A-5 of subpart A, expressed in metric tons of each GHG. For fluorinated GHG,

- report emissions of all fluorinated GHG, including those not listed in Table A-1 of subpart A; and
- c. Any other data specified in the “Data reporting requirements” section of each applicable subpart.
6. A written explanation, as required under 40 CFR 98.3(e), if emission calculation methodologies are changed during the reporting period.
 7. A brief description of each “best available monitoring method,” the parameters measured using the method, and the time period during which the “best available monitoring method” was used, if applicable.
 8. Each data element for which a missing data procedure was used according to the procedures of an applicable subpart and the number of hours in the year that a missing data procedure was used for each data element.
 9. A signed and dated certification statement provided by the designated representative of the owner or operator, according to the requirements of 40 CFR 98.4(e)(1).
 10. NAICS code(s) that apply to the facility or supplier.
 - a. Primary NAICS code. Report the NAICS code that most accurately describes the facility or supplier's primary product/activity/service. The primary product/activity/service is the principal source of revenue for the facility or supplier. A facility or supplier that has two distinct products/activities/services providing comparable revenue may report a second primary NAICS code.
 - b. Additional NAICS code(s). Report all additional NAICS codes that describe all product(s)/activity(s)/service(s) at the facility or supplier that are not related to the principal source of revenue.
 11. Legal name(s) and physical address(es) of the highest-level United States parent company(s) of the owners (or operators) of the facility or supplier and the percentage of ownership interest for each listed parent company as of December 31 of the year for which data are being reported according to the following instructions:
 - a. If the facility or supplier is entirely owned by a single United States company that is not owned by another company, provide that company's legal name and physical address as the United States parent company and report 100 percent ownership.
 - b. If the facility or supplier is entirely owned by a single United States company that is, itself, owned by another company (e.g., it is a division or subsidiary of a higher-level company), provide the legal name and physical address of the highest-level company in the ownership hierarchy as the United States parent company and report 100 percent ownership.
 - c. If the facility or supplier is owned by more than one United States company (e.g., company A owns 40 percent, company B owns 35 percent, and company C owns 25 percent), provide the legal names and physical addresses of all the highest-level companies with an ownership interest as the United States parent companies, and report the percent ownership of each company.
 - d. If the facility or supplier is owned by a joint venture or a cooperative, the joint venture or cooperative is its own United States parent company. Provide the legal name and physical address of the joint venture or

cooperative as the United States parent company, and report 100 percent ownership by the joint venture or cooperative.

- e. If the facility or supplier is entirely owned by a foreign company, provide the legal name and physical address of the foreign company's highest-level company based in the United States as the United States parent company, and report 100 percent ownership.
- f. If the facility or supplier is partially owned by a foreign company and partially owned by one or more U.S. companies, provide the legal name and physical address of the foreign company's highest-level company based in the United States, along with the legal names and physical addresses of the other U.S. parent companies, and report the percent ownership of each of these companies.
- g. If the facility or supplier is a federally owned facility, report "U.S. Government" and do not report physical address or percent ownership.

Under 40 CFR 98.3(h), the owner or operator submits a revised report within 45 days of discovering that an annual GHG report that the owner or operator previously submitted contains one or more substantive errors or being notified by EPA of errors in its GHG report. The revised report must correct all substantive errors.

Under 40 CFR 98.4(d), the designated representative submits the certificate of representation at least 60 days before the report deadline. Under 40 CFR 98.4(i), the certificate of representation includes:

1. An identification of the facility or supplier for which the certificate of representation is submitted;
2. The name, organization name (company affiliation-employer), address, e-mail address (if any), telephone number, and facsimile transmission number (if any) of the designated representative and any alternate designated representative;
3. A list of the owners and operators of the facility or supplier, provided that, if the list includes the operators of the facility or supplier and the owners with control of the facility or supplier, the failure to include any other owners does not make the certificate of representation incomplete;
4. The certification statements listed in 40 CFR 98.4(i)(4); and
5. The signature of the designated representative and any alternate designated representative and the dates signed.

The GHGRP also includes notification procedures for changing a designated representative or alternate designated representative (40 CFR 98.4(g)).

Under 40 CFR 98.4(m)(2), in order to delegate his or her own authority to one or more individuals to submit an electronic submission of the GHG reports, the designated representative or alternate designated representative submits electronically to the Administrator a notice of delegation that includes the following elements:

1. The name, organization name (company affiliation-employer) address, e-mail address (if any), telephone number, and facsimile transmission number (if any) of such designated representative or alternate designated representative.
2. The name, address, e-mail address, telephone number, and facsimile transmission number (if any) of each such individual (referred to as an “agent”).
3. For each such individual, a list of the type or types of electronic submissions under 40 CFR 98.4(m)(1) for which authority is delegated to him or her.
4. For each type of electronic submission listed in accordance with clause (iii), the facility or supplier for which the electronic submission may be made.
5. The certification statements in 40 CFR 98.4(m)(2)(v).
6. The signature of such designated representative or alternate designated representative and the date signed.

Facilities that may discontinue reporting. Under 98.2(i), if reported emissions are less than 25,000 metric tons CO₂e/year for five consecutive years or less than 15,000 metric tons CO₂e/year for three consecutive years, then the owner or operator may discontinue complying provided that the owner or operator submits a notification to the Administrator that announces the cessation of reporting and explains the reasons for the reduction in emissions. The owner or operator maintains the corresponding records required under 40 CFR 98.3(g) for the five (or three) consecutive years and then retain such records for three years following the year that reporting was discontinued.

If the operations of a facility or supplier are changed such that all applicable GHG-emitting processes and operations cease to operate, then the owner or operator is exempt from reporting in the years following the year in which cessation of such operations occurs, provided that the owner or operator submits a notification to the Administrator that announces the cessation of reporting and certifies to the closure of all GHG-emitting processes and operations. This does not apply to seasonal or other temporary cessation of operations or facilities with municipal solid waste landfills, industrial waste landfills, or underground coal mines. The owner or operator resumes reporting for any future calendar year during which any of the GHG-emitting processes or operations resume operation.

Other source categories. Facilities that contain any of the source categories listed in Section 4(a) and that exceed the threshold for any source category (or include a source category in which all facilities report) report information specific to each source category at the facility for which methods are specified in 40 CFR Part 98, in addition to the general reporting and stationary combustion requirements outlined above. Many facilities that are affected by the GHGRP emit GHGs from multiple sources.

The sector-specific reporting requirements are outlined in Appendix C.

Recordkeeping Requirements

General requirements that apply to all sources. The owner or operator of each facility that is subject to the GHG emissions reporting requirements keeps the following records for at least three years from the date of submission of the annual GHG report for the reporting year in which the record was generated. Upon request by the Administrator, the records required under this section must be made available to EPA. Records may be retained off site if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records shall be made available, or, if requested by EPA, electronic records shall be converted to paper documents.

1. A list of all units, operations, processes, and activities for which GHG emissions were calculated.
2. The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type, including: (i) The GHG emissions calculations and methods used; (ii) Analytical results for the development of site-specific emissions factors; (iii) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters; and (iv) Any facility operating data or process information used for the GHG emission calculations.
3. The annual GHG reports.
4. Missing data computations. For each missing data event, respondents must maintain records of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.
5. A written GHG Monitoring Plan, which must include, at a minimum, the following: (i) Identification of positions of responsibility (i.e., job titles) for collection of the emissions data; (ii) Explanation of the processes and methods used to collect the necessary data for the GHG calculations; and (iii) Description of the procedures and methods that are used for quality assurance, maintenance, and repair of all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported.
 - a. The owner or operator must revise the GHG Monitoring Plan as needed to reflect changes in production processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.
 - b. Upon request by the Administrator, the owner or operator must make all information that is collected in conformance with the GHG Monitoring Plan available for review during an audit. Electronic storage of the information in the plan is permissible, provided that the information can be made available in hard copy upon request during an audit.
6. The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported.
7. Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under 40 CFR 98.

Other source categories. Facilities that report and that contain any of the source categories listed in Section 4(a) also retain records for information specific to the given source category. The sector-specific recordkeeping requirements are outlined in Appendix D.

(ii) Respondent Activities

The owner or operator of a facility that is subject to the GHGRP's reporting requirements reports total annual GHG emissions in metric tons of CO₂e, as applicable. The primary tasks that reporting program respondents perform include:

1. Implement and update, as necessary, appropriate monitoring plans for each affected source and each affected unit at a source, as applicable;
2. Operation and maintenance activities associated with the monitoring, including quality assurance activities;
3. Ensuring data quality, preparing annual reports for submission to EPA, and submitting these reports to EPA;
4. Potentially responding to questions or error messages from EPA; and
5. Maintaining records for a minimum of three years.

Respondents that use CEMS also conduct tests to certify the operations of monitors, submit the results of these tests, and record emissions data (this activity generally is performed electronically).

Reports present the annual mass GHG emissions from each source category separately. The calculations used to determine GHG emissions, the frequency at which those calculations are required, the methods used to estimate missing data, and the QA/QC requirements depend on the specific source category.

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

5(a) Agency Activities

EPA Headquarters activities include the monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation.

5(b) Collection Methodology and Management

EPA has established a central repository of inventory data for all respondents, the web-based Electronic Greenhouse Gas Reporting Tool (e-GGRT). Respondents report data electronically, and EPA stores the data in the database. Facilities and suppliers subject to the GHGRP register online through the e-GGRT system.

All data is submitted to EPA electronically in e-GGRT except the one-time Electronic Signature Agreement (ESA) which is submitted on paper. The tool has an XML reporting

schema that allows facilities to upload GHG data directly in lieu of using the web forms provided through e-GGRT. The XML reporting schema contains all of the data elements needed to comply with the GHGRP. The electronic reports submitted under the GHGRP are subject to the provisions of 40 CFR Part 3, specifying EPA systems to which electronic submissions must be made and the requirements for valid electronic signatures. Additionally, E-GGRT can handle CBI.

The new system follows Agency standards for design, security, data element and reporting format conformance, and accessibility. EPA designed the database in an attempt to minimize respondents' burden by integrating the new reporting requirements with existing data collection and data management systems, when feasible.

All facilities or suppliers must have a Designated Representative (DR) in order to report. The DR may appoint an Alternative Designated Representative (ADR) and agents. The DR, ADR, and agent are all able to enter data and submit the electronic report. Before submitting a report, the DR (or ADR) must certify the annual report. An electronic signature device (e.g., a PIN or password) is required to submit a report.

5(c) Small Entity Flexibility

EPA took several steps to minimize the impacts on small entities. 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 uses existing GHG emissions estimation and reporting methodologies and provides simplified methodological options to reduce reporting burden. According to the Agency's analysis, a facility with stationary combustion units that have a maximum rated heat input capacity of less than 30 mmBtu/hr, operating full time with any type of fossil fuel, would not exceed 25,000 metric tons CO_{2e}/year. Exempting facilities based on combustion unit capacity has allowed for small entities to perform a simple calculation to determine if they are even required to estimate emissions for applicability purposes.

Additionally, EPA minimized the impact on small entities in subpart NN (Suppliers of Natural Gas and Natural Gas Liquids) by amending the reporting threshold from an all-in threshold to a capacity-based threshold. EPA revised the applicability threshold so that only local distribution companies (LDCs) that deliver 460,000 thousand standard cubic feet (mscf) or more of natural gas per year are subject to the GHGRP (75 FR 79092; December 17, 2010).

The rule includes a mechanism in 40 CFR 98.2 to allow facilities and suppliers that report less than 25,000 metric tons of CO_{2e}/year for 5 years or less than 15,000 metric tons CO_{2e}/year for 3 years to cease annual reporting to EPA.

5(d) Collection Schedule

Facilities collect data and calculate emissions at varying frequencies, as described in the GHGRP, and summarized in Appendices C and D. Most facilities that meet the GHGRP's reporting requirements submit GHG emission reports annually.

Facilities report all U.S. parent company(s) information and facility primary NAICS code(s) annually. EPA requires 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 GHGRP.

A facility or supplier that becomes subject to the GHGRP because of a physical or operational change report emissions for the first calendar year in which the change occurs beginning with the first month of the change. A facility or supplier that becomes subject to the GHGRP solely because of an increase in hours of operation or level of production reports emissions beginning the first month of the change if it would cause the facility or supplier to exceed the applicable threshold if maintained for the remainder of the year.

Facilities or suppliers that have emissions or products with emission less than 25,000 metric tons of CO₂e for five years in a row or less than 15,000 metric tons of CO₂e for three years in a row may discontinue complying provided that the owner or operator submits a notification to the Administrator that announces the cessation of reporting and explains the reasons for the reduction in emissions. The notification must be submitted no later than March 31 of the year immediately following the fifth (or third) consecutive year of emissions less than 25,000 (or 15,000) tons CO₂e/year. The owner or operator must maintain the corresponding records required under 40 CFR 98.3(g) for each of the five (or three) consecutive years and retain such records for three years following the year that reporting was discontinued. The owner or operator must resume reporting if annual emissions in any future calendar year increase to 25,000 (or 15,000) metric tons CO₂e/year or more.

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). EPA estimates that, over the three years covered by this request, the total respondent burden associated with this reporting will average 981 thousand hours per year and the cost of all respondents of the information collection will average \$90.8 million per year.

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. Section 6(f) provides reasons for any change in burden. The burden statement for this information collection is in Section 6(g).

6(a) Estimating Respondent Burden

Respondent burden estimates are presented in Exhibit 6.1. EPA estimates that the total annual burden to all affected entities is 981,032 hours per year over the three years covered by this information collection. EPA also estimated the number of responses, or actions taken as a result of the rule, per respondent (facility) per year; for facilities collecting samples on a daily basis, this means a minimum of 365 responses per year. Exhibit 6.1 presents aggregate burden by sector only; for the details of burden calculations, please see the cost appendices.

6(b) Estimating Respondent Costs

Costs to respondents associated with this information collection include labor costs (i.e., the cost of labor by facility staff to meet the rule's information collection requirements) and non-labor costs (e.g., the cost of purchasing and installing monitoring equipment or contractor costs associated with providing the required information).

To calculate labor costs, EPA estimated Bureau of Labor Statistics using an approach consistent with the ICRs associated with the GHGRP currently approved by OMB^[1]. For all subparts the labor rates are: \$59.12 for technical workers, \$77.23 for managers, \$31.35 for clerical support, and \$109.94 for legal support. In addition, sector-specific labor rates are used for certain subparts in the oil and gas industry: \$121.72 for senior managers, \$106.89 for middle managers, \$78.29 for engineers, \$66.57 for technicians, and \$148.92 for geoscientists. Non-labor costs (capital and O&M) for individual sectors are summarized in Exhibit 6-1.

EPA estimates that the total annual cost to all affected non-federal entities is \$90.8 million over the three years covered by this information collection. Exhibit 6.1 presents aggregate costs by sector; for the details of EPA's cost calculations, please see Appendices E-M.

Exhibit 6.1 Annual Average Respondent Burden and Cost

^[1] May 2011 National Industry-Specific Occupational Employment and Wage Estimates (<http://www.bls.gov/oes/current/oesrci.htm>) and Employer Costs for Employee Compensation for June of 2011 (http://www.bls.gov/news.release/archives/ecec_09082011.pdf). See Appendix F for more information.

For the GHG Reporting Program (\$K)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
C. Stationary Combustion (general unspecified)	2,568	41	104,674	262,854	\$15,551	\$820	\$2,366	\$18,737
D. Electricity Generation	1,259	9	9,815	68,171	\$4,035	\$0	\$0	\$4,035
E. Adipic Acid Prod.	3	28	84	555	\$33	\$0	\$25	\$58
F. Aluminum Production	12	17	198	3,604	\$232	\$0	\$3	\$235
G. Ammonia Manufacturing	22	107	2,355	2,150	\$129	\$1	\$129	\$259
H. Cement Production	98	510	50,007	28,152	\$1,698	\$546	\$1,681	\$3,925
I. Electronics Manufacturing	94	7	662	35,001	\$2,055	\$3,512	\$0	\$5,567
K. Ferroalloy Production	10	99	987	821	\$48	\$0	\$16	\$65
L. Fluorinated Greenhouse Gas Prod	14	7	99	2,601	\$142	\$33	\$14	\$190
N. Glass Production	106	102	10,816	8,506	\$508	\$0	\$107	\$615
O. HCFC-22 Production and HFC-23 Destruction	5	92	460	768	\$42	\$0	\$0	\$42
P. Hydrogen Production	46	23	1,057	3,428	\$203	\$0	\$87	\$290
Q. Iron and Steel Production	122	92	11,229	35,158	\$1,848	\$0	\$275	\$2,123
R. Lead Production	12	102	1,224	1,053	\$62	\$0	\$19	\$81
S. Lime Manufacturing	70	544	38,083	15,312	\$909	\$422	\$1,109	\$2,439
T. Magnesium Production	11	9	99	2,061	\$123	\$0	\$2	\$124
U. Misc. Uses of Carbonate	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00
V. Nitric Acid Production	37	42	1,557	6,728	\$421	\$14	\$177	\$613
W. Oil and Natural Gas Systems	2,786	8	21,201	229,624	\$18,324	\$730	\$1,687	\$20,741
X. Petrochemical Prod.	63	92	5,799	12,807	\$737	\$0	\$582	\$1,319
Y. Petroleum Refineries	146	92	13,438	57,512	\$3,332	\$173	\$224	\$3,728
Z. Phosphoric Acid Prod	10	544	5,440	2,187	\$130	\$60	\$158	\$348
AA. Pulp & Paper Mnfctrng	116	92	10,677	11,148	\$655	\$1,709	\$43	\$2,407
BB. Silicon Carbide Production	1	37	37	153	\$9	\$0	\$0	\$9
CC. Soda Ash Manufacturing	4	93	372	932	\$57	\$0	\$7	\$64
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	141	7	993	10,635	\$596	\$0	\$0	\$596
EE. Titanium Dioxide Production	7	93	651	1,091	\$65	\$0	\$3	\$68
FF. Underground Coal Mines	114	21	2,366	39,558	\$2,339	\$220	\$456	\$3,015
GG. Zinc Production	6	108	648	657	\$39	\$1	\$5	\$45
HH. Landfills	1,195	92	109,989	45,311	\$2,611	\$66	\$127	\$2,804
II. Wastewater	358	7	2,525	3,203	\$188	\$284	\$1,017	\$1,489
JJ. Manure Management (2)	107	91	9,801	4,643	\$275	\$1	\$0	\$276
LL. Suppliers of Coal-based Liquid Fuels,								
MM. Suppliers of Petrol. Prod.	315	99	31,057	13,375	\$936	\$0	\$0	\$936
NN. Supplies of Nat Gas and Nat Gas Liquids	474	53	25,240	31,095	\$1,852	\$0	\$0	\$1,852
OO. Suppliers of Industrial GHG	49	15	737	2,733	\$163	\$0	\$0	\$163
PP. Suppliers of CO2	130	36	4,685	5,882	\$346	\$0	\$0	\$346
QQ - Imports and Exports of Fluorinated GHGs in Products	158	7	1,112	11,063	\$661	\$0	\$0	\$661
RR. Geologic Sequestration of Carbon Dioxide	3	23	61	2,136	\$194	\$135	\$327	\$656
SS - SF6 Equipment Producers	10	7	70	441	\$24	\$0	\$0	\$24
TT - Industrial Landfills	200	8	1,608	13,493	\$782	\$11	\$88	\$881
UU. Injection of Carbon Dioxide	92	12	1,108	3,805	\$264	\$0	\$208	\$472
Mobile Sources	316	1	316	626	\$36	\$8,514	\$0	\$8,550
TOTAL	11,039	Varies	483,340	981,032	\$62,655	\$17,253	\$10,940	\$90,848

(1) Some respondents belong to multiple source categories, so the number of respondents is not additive.

(2) EPA will not be implementing Subpart J J due to a Congressional restriction prohibiting the expenditure of funds for this purpose.

6(c) Estimating Agency Burden and Cost

This section describes the burden and cost to the federal government associated with this information collection. Federal activities under this information collection include EPA Headquarters oversight of the reporting program and required reporting by federally owned GHG generating facilities.

EPA Burden and Cost for Program Oversight

EPA activities associated with the GHG reporting program include Headquarters oversight and implementation of the reporting program, e.g., monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation. EPA estimates that Headquarters will devote up to 25 full time equivalents (FTEs), or an estimated 52,000 hours to these activities.

To develop EPA labor costs, EPA estimates the average hourly labor rate for salary and overhead and benefits for Agency staff to be \$52.37. To derive this figure, EPA multiplied the hourly compensation at GS-12, Step 5 on the 2011 GS pay scale (\$32.73) by the standard government benefits multiplication factor of 1.6 to account for overhead and benefits.

In addition to the labor cost, EPA will incur a non-labor cost of approximately \$10.7 million in each of the three years of the information collection for developing guidance, training, responding to stakeholders, communication and outreach, database maintenance, and other contractor support.

Burden and cost for federal facilities covered by the rule

Federally owned facilities that exceed the CO₂e threshold must report their GHG emissions. In 2010, federally owned facilities reported in subparts C (Stationary Combustion, general unspecified), D (Electricity Generation), V (Nitric Acid Production), and HH (Landfills). It is anticipated that federally owned facilities will also report under subparts RR and UU (sequestration of CO₂, under which federally owned facilities are anticipated to seek exemptions, and Injection of CO₂). EPA calculated the reporting burden and cost for these facilities in the same manner as it did for other reporting facilities. EPA estimates that the federal burden for these facilities is approximately 6,635 hours, for an annual total cost of \$470,645.

Exhibit 6.2 presents the annual burden and cost for federal facilities that must comply with the rule.

Exhibit 6.2 Annual Agency Burden and Cost

Information Collection Activity	Annual Responses	Total Annual Burden	Labor Cost	Non-Labor Cost	Total Annual Cost
Oversight					
Guidance Development, Training, Audits, and General Oversight	1	52,000	\$2,723,240	\$10,666,667	\$13,389,907
Burden for Compliance by Federal Facilities					
C. Stationary Combustion (general unspecified)	2091	5,016	\$296,727	\$60,792	\$357,518
D. Electricity Generation	148	1,029	\$60,887	\$0	\$60,887
V. Nitric Acid Production	42	182	\$11,382	\$5,174	\$16,555
HH. Landfills	92	228	\$13,112	\$965	\$14,077
RR. Geologic Sequestration of Carbon Dioxide	1	16	\$1,097	\$0	\$1,097
UU. Injection of CO2	4	165	\$11,486	\$9,024	\$20,510
TOTAL	2,379	58,635	\$3,117,931	\$10,742,621	\$13,860,552

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

The number of respondents in each sector that perform the required activities under this information collection is presented in Exhibit 6.1. The required activities depend on whether the facility must report its GHG emissions and on the applicable sector-specific reporting requirements. These activities are described in Section 4(b) of this ICR.

6(e) Bottom Line Burden Hours and Costs

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

Exhibit 6.3 Bottom Line Annual Burden and Cost

Number of Respondents	11,039		From Exhibit 6.1
Total Annual Responses	483,340		From Exhibit 6.1
Number of Responses per Respondent	44 =	483,340	Total annual responses from above ÷ Total respondents from above
Total Respondent Hours	981,032		From Exhibit 6.1
Hours per Response	2.03 =	981,032	Total annual hours from above ÷ Total responses from above
Annual O&M and Capital Cost	\$28,192,763		From Exhibit 6.1
Total Respondent Cost (labor + non)	\$90,847,769		From Exhibit 6.1
Total Hours (Respondents and Agency)	1,039,667 =	981,032	Total respondent hours from above + Total EPA hours from Exhibit 6-2
Total Cost (Respondents and Agency)	\$104,708,321 =	\$90,847,769	Total respondent cost from above + Total EPA cost from Exhibit 6-2

6(f) Reasons for Change in Burden

This section presents the change in burden and explains the reasons for the change in burden. Exhibit 6.4 summarizes the adjustments that have affected the overall burden inventory for the final GHGRP ICRs. There is a decrease of 726,202 hours and \$36,517,000 in the total estimated respondent burden compared with that identified in the ICRs associated with the GHGRP currently approved by OMB. This decrease reflects the completion of one-time activities that occurred in the first year of data collection and a reduction in the number of respondents. This change is the result of a program adjustment.

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Exhibit 6.4 Summary of Changes in Annual Burden

Title	Current OMB Control Number	Reference EPA ICR Number(s)	No. Respondents	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
"Track 1" Subparts, Not Including Mobile Sources (Subparts C, D, E, F, G, H, N, O, P, Q, R, S, U, V, X, Y, Z, AA, BB, CC, EE, GG, HH, JJ, LL, MM, NN, OO, and PP)								
Current Inventory	2060-0629	2300.03 - 2300.09	16,408	1,024,285	\$54,994	\$8,770	\$10,314	\$74,079
Revised Inventory			6,742	622,222	\$36,628	\$3,813	\$7,142	\$47,582
Change			-9,666	(402,062)	-\$18,367	-\$4,957	-\$3,173	-\$26,496
Reason for Change in Burden (See Appendix G-3 for more details)								
<ul style="list-style-type: none"> Removed one-time burden for coverage determination, which affected 19,848 respondents, who incurred 258,019 hours in burden (over three years, this averaged 6,610 respondents and 86,006 hours). Adjusted the number of respondents based on the number of facilities that reported to eGGRT. Adjusted the labor hours, labor cost, O&M costs, and capital cost per facility to recognize the completion of the one-time activities that occurred in the first year of data collection (2010). Adjusted labor hours and dollars to correct an error in the ICR associated with the December 17, 2010, amendments to the GHGRP (ICR No. 2300.06). 								
Magnesium Production, Underground Coal Mines, Industrial Wastewater Treatment, and Industrial Waste Landfills (Subparts T, FF, II, and TT)*								
Current Inventory	2060-0647	2396.01, 2396.02	683	65,958	\$3,635	\$515	\$1,563	\$5,713
Revised Inventory			683	57,852	\$3,401	\$515	\$1,563	\$5,479
Change			0	(8,107)	-\$234	\$0	\$0	-\$234
Reason for Change in Burden (see Appendix H-3 for more details)								
<ul style="list-style-type: none"> Adjusted the labor hours and labor cost per facility to recognize the completion of the one-time activities that occurred in the first year of data collection (2011). 								
Petroleum and Natural Gas Systems (Subpart W)*								
Current Inventory	2060-0651	2376.02, 2376.03, 2376.05	2,786	394,757	\$25,139	\$745	\$1,687	\$27,570
Revised Inventory			2,786	227,738	\$18,201	\$730	\$1,687	\$20,618
Change			0	(167,019)	-\$6,938	-\$15	\$0	-\$6,953
Reason for Change in Burden (see Appendix I-3 for more details):								
<ul style="list-style-type: none"> Adjusted the labor hours and labor cost per facility to recognize the completion of the one-time activities that occurred in the first year of data collection (2011). Corrected an error in the 2010 ICR, in which the burden hours for two activities were summed incorrectly (see Appendix I). 								
Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, and SS)*								
Current Inventory	2060-0650	2373.02 - 2373.04	417	76,701	\$4,152	\$2,705	\$10	\$6,866
Revised Inventory			417	59,458	\$3,461	\$3,545	\$14	\$7,020
Change			0	(17,243)	-\$691	\$841	\$5	\$154
Reason for Change in Burden (see Appendix J-3 for more details):								
<ul style="list-style-type: none"> Adjusted the labor hours, labor cost, O&M costs, and capital cost per facility to recognize the completion of the one-time activities that occurred in the first year of data collection (2011). Note: EPA is considering future amendments to Subpart I. These changes would be documented in a future ICR, which would amend this renewal ICR. 								

Exhibit 6.4 Summary of Changes in Annual Burden (continued)

Title	Current OMB Control Number	Reference EPA ICR Number(s)	No. Respondents	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
Injection and Geologic Sequestration of Carbon Dioxide (Subparts RR and UU)*								
Current Inventory	2060-0649	2372.02, 2372.03	89	4,794	\$357	\$88	\$439	\$884
Revised Inventory			95	5,877	\$454	\$135	\$534	\$1,124
Change			6	1,083	\$97	\$47	\$95	\$240
Reason for Change in Burden (see Appendix K-3 for more details):								
<ul style="list-style-type: none"> • Shifted the activities associated with Subpart RR two years into the future to reflect the fact that Class VI UIC permits were not issued as quickly as anticipated in the ICR. For example, the activities estimated for Year 1 of the current ICR (2011) have been shifted to Year 1 of the renewal ICR (2013, the first year in which Class VI injection is expected to begin). • Adjusted the labor hours, labor cost, O&M costs, and capital cost per facility for Subpart UU to recognize the completion of the one-time activities that occurred in the first year of data collection (2011). • Adjusted the number of respondents for Subpart UU to reflect the slightly higher number of facilities anticipated in the out-years of the previous ICR. 								
Provision of Information on Parent Companies, NAICS Codes, and Whether Emissions are from Cogeneration, Not Including Mobile Sources								
Current Inventory	2060-0646	2374.02	10,551	9,487	\$571	\$0	\$0	\$571
Revised Inventory			10,723	7,259	\$475	\$0	\$0	\$475
Change			172	(2,228)	-\$97	\$0	\$0	-\$97
Reason for Change in Burden (see Appendix L-2 for more details):								
<ul style="list-style-type: none"> • Adjusted the number of respondents to reflect available information on the actual number of facilities that reported to eGRT (in the case of the "Track 1" sectors) and to reflect the number of respondents estimated for the "Track 2" sectors. • Adjusted the labor hours and labor cost facility to recognize the completion of the one-time activities that occurred in the first year of data collection (2010 and 2011). 								
Mobile Sources								
Current Inventory, Not Including Below	2060-0629	2300.03	317	140,680	\$8,605	\$0	\$0	\$8,605
Current Inventory, Aircraft Engines	2060-0680	2427.02	10	60	\$3,646	\$0	\$0	\$3,646
Revised Inventory			316	626	\$36	\$8,514	\$0	\$8,550
Change			-11	(140,114)	-\$12,216	\$8,514	\$0	-\$3,702
Reason for Change in Burden:								
<ul style="list-style-type: none"> • Removed heavy-duty engine manufacturers, in which are accounted for in other ICRs (OMB No. 2060-0104, ICR No. 0783.58 and OMB No. 2060-0678, ICR No. 2394.02) • Corrected an error in the 2010 ICR, which capital costs were expressed as burden. 								
All Subparts, All Activities**								
Current Inventory			20,710	1,707,234	\$100,529	\$12,823	\$14,013	\$127,364
Revised Inventory			11,039	981,032	\$62,655	\$17,253	\$10,940	\$90,848
Change			-9,671	(726,202)	-\$37,874	\$4,430	-\$3,073	-\$36,517
* Does not include the provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration.								
** Because respondents to the request for data on parent companies, NAICS codes, and whether emissions are from cogeneration applies to all respondents, the number of respondents is not additive.								

6(g) Burden Statement

The respondent reporting burden for this collection of information is estimated to average 981,032 hours per year for a three-year period. The average annual burden to EPA for this period is estimated to be 52,000 hours for oversight activities and 6,635 hours for federal facilities that must comply with the rule. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2.03 hours per response.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9.

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-2012-0333, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation docket in the EPA Docket Center (EPA/DC), EPA West Building, 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 and Radiation docket is (202) 566-1742. An electronic version of the public docket is available at <http://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-2012-0333 and OMB Control Number 2060-0629 on any correspondence.