

Information Collection Request Change Worksheet
for
NSPS for Onshore Natural Gas Processing Plants (40 CFR part 60, subparts KKK and LLL)
OMB Control Number 2060-0129
EPA ICR Number 1086.11

This change worksheet merges OMB Control Number 2060-0672 with this OMB Control Number. OMB Control Number 2060-0672 covers the final rulemaking “Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews” (published 8/16/12, RIN 2060-AP76). The requirements associated with the final rule were submitted separately from 2060-0120 because there was another package pending under this series at the time the rule ICR needed to be submitted.

The reduction in burden included in this change worksheet results from the development of 40 CFR part 60, subpart OOOO, which supersedes both 40 CFR part 60, subparts KKK and LLL. Any new or modified affected facility will begin reporting under subpart OOOO instead of subpart KKK and LLL. The requirements under subpart OOOO are covered by OMB Control Number 2060-0673.

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.