**SUPPORTING STATEMENT**

 **ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal), EPA ICR Number 1975.09, OMB Control Number 2060-0548.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) was proposed on December 19, 2002, promulgated on June 15, 2004 (69 FR 33474), and revised on June 26, 2006. The original NESHAP applied only to stationary RICE having a rating of greater than 500 horsepower (HP) and that are located at major sources. The NESHAP was amended on January 18, 2008 (73 FR 3568) to include new or reconstructed stationary RICE having a rating of less than or equal to 500 HP and that are located at major sources, and new or reconstructed stationary RICE located at area sources. The revised NESHAP also addressed other types of stationary RICE having a rating of less than 500 HP and that are located at major sources, as well as stationary RICE located at area sources, but these requirements were identical to and are covered under the new source performance standards (NSPS) subparts IIII and JJJJ.

At the time that EPA promulgated the January 18, 2008 standards, EPA did not promulgate a final decision for existing stationary RICE located at area sources, or for existing stationary RICE having a rating of less than or equal to 500 HP and that are located at major sources. EPA issued subsequent standards addressing existing compression ignition (CI) RICE and existing spark ignition (SI) RICE sources on March 3, 2010 (75 FR 9648) and August 20, 2010 (75 FR 51570), respectively.

On January 30, 2013 (78 FR 6674), EPA finalized amendments to the NESHAP that included new reporting requirements for stationary emergency RICE having a rating of greater than 100 HP, and that operate or are contractually obligated to be available for more than 15 hours per year (up to a maximum of 100 hours per year) for emergency demand response.

This supporting statement addresses the burden associated with the original NESHAP and each of the amendments described above. This information is being collected to assure compliance with 40 CFR part 63, subpart ZZZZ.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 146,077 existing respondents per year will be subject to the standard, and 1,284 additional respondents per year will become subject to the standard. In addition, there are 755,430 existing respondents that are subject but only have recordkeeping requirements.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

 The “Affected Public” are owners or operators of new, reconstructed, or existing stationary RICE. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ).

**2. Need for and Use of the Collection**

**2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from RICE cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart ZZZZ.

**2(b) Practical Utility/Users of the Data**

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

Performance tests are required in order to determine an affected facility’s initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times.

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

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

**3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart ZZZZ.

**3(a) Non-duplication**

 If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

**3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (78 FR 33409) on June 4, 2013. No comments were received on the burden published in the Federal Register.

**3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA’s Office of Compliance. OTIS is EPA’s database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultation with the Agency’s internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Engine Manufacturers Association (EMA), at (312) 929-1970; and 2) the Interstate Natural Gas Association of America (INGAA), at (202) 216-5900.

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

**3(d) Effects of Less Frequent Collection**

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

**3(e) General Guidelines**

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

 These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five-years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

**3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

**3(g) Sensitive Questions**

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

**4. The Respondents and the Information Requested**

**4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of new, reconstructed, or existing stationary RICE. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes, are provided in the following table.

| **Standard (40 CFR Part 63, Subpart ZZZZ)** | **SIC Codes** | **NAICS Codes** |
| --- | --- | --- |
| Electric Power Generation, Transmission, or Distribution | 4910 | 2211 |
| Crude Petroleum and Natural Gas Production | 1311 | 211111 |
| Natural Gas Liquids Producers | 1321 | 211112 |
| Medical and Surgical Hospitals | 8062 | 622110 |
| Natural Gas Transmission | 4922 | 486210 |
| National Security | 9711 | 928110 |

**4(b) Information Requested**

 **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ).

A source must make the following reports:

| **Notifications** |
| --- |
| Initial notifications (e.g., construction/reconstruction, anticipated startup, actual startup)  | 63.6645, 63.9(b) |
| Notification of compliance status | 63.6645, 63.9(h) |
| Notification of performance test | 63.6645(g), 63.7(b)(1), 63.9(e) |

| **Reports** |
| --- |
| Semiannual and annual compliance reports | 63.6650 |

A source must keep the following records:

| **Recordkeeping** |
| --- |
| Five-year retention of records | 63.6660(b) |
| Records of all notifications and reports | 63.6655(a)(1) |
| Records of the occurrence and duration of each malfunction of the stationary RICE and each malfunction of the air pollution control equipment | 63.6655(a)(2) |
| Records of performance tests and performance evaluations | 63.6655(a)(3) |
| Records of all required maintenance performed on the air pollution control and monitoring equipment | 63.6655(a)(4) |
| Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation | 63.6655(a)(5) |
| Records of each startup, shutdown, malfunction, maintenance, or repair, as well as previous (i.e., superseded) versions of the performance evaluation plan | 63.6655(b), 63.10(b), 63.8(d)(3) |
| Records of daily fuel usage for landfill and digester gas-fired units | 63.6655(c) |
| Records of the catalyst pressure drop (measured monthly), catalyst inlet temperature (4-hour average), and average reduction of CO emissions determined from CEMS measurements before and after the emission control device (using a 4-hour average, averaged every hour) | 63.6655(d) |
| Records of maintenance conducted on the stationary RICE | 63.6655(e) |
| Records of the number of hours of operation recorded through a non-resettable hour meter | 63.6655(f) |

Electronic Reporting

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

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

**(ii) Respondent Activities**

| **Respondent Activities** |
| --- |
| Read instructions. |
| Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure. |
| Perform initial performance test, Reference Methods 1, 1A, 3, 3A, 3B, 4, 10, 25A, 320, or 323 test, and repeat performance tests if necessary. |
| Write the notifications and reports listed above. |
| Enter information required to be recorded above. |
| Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information. |
| Train personnel to be able to respond to a collection of information. |
| Transmit, or otherwise disclose the information. |

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

**5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

| **Agency Activities** |
| --- |
| Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry. |
| Audit facility records. |
| Input, analyze, and maintain data in the Online Tracking Information System (OTIS).  |

**5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source’s initial capability to comply with the emission standard, and to note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

 The records required by this regulation must be retained by the owner/operator for five years.

**5(c) Small Entity Flexibility**

 A majority of the respondents are large entities (i.e. large businesses). However, the impact on small entities (i.e. small businesses) was taken into consideration during the development of the regulation.

Minimizing the information collection burden for all sizes of organizations is a continuing effort for the EPA. To reduce the impact on small entities, only engines greater than 500 HP are subject to continuous monitoring and additional performance testing. Small entities will be required to conduct fewer performance tests than large sources, reducing the impact on small sources. Furthermore, EPA is requiring less reporting requirements on smaller sources. Thus, we do not believe that the NESHAP will have a significant impact on a substantial number of small entities.

**5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal).

**6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

**6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,427,264 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

**6(b) Estimating Respondent Costs**

**(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial $122.49 ($58.33+ 110%)

Technical $101.28 ($48.23 + 110%)

Clerical $50.80 ($24.19 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2012, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

| **Capital/Startup vs. Operation and Maintenance (O&M) Costs** |
| --- |
| (A)Continuous Monitoring Device | (B)Capital/Startup Cost for One Respondent | (C)Number of New Respondents a | (D)Total Capital/Startup Cost, (B X C) | (E)Annual O&M Costs for One Respondent | (F)Number of Respondents with O&M b | (G)Total O&M,(E X F) |
| CO monitors c | $583 | 1,179 | $687,357 | $1,873 | 13,346 | $24,997,058 |
| CPMS – small | $1,708 | 1,179 | $2,013,732 | N/A | N/A |  |
| CPMS – large d | $427 | 366 | $156,282 | N/A | N/A |  |
| **Total** |  |  | **$2,857,371** |  |  | **$24,997,058** |

CPMS – continuous parameter monitoring system for temperature monitoring and monthly pressure drop measurement

Note: Existing CI and SI engines subject to the 2010 amendments and covered under EPA ICR Number 1975.07 and 1975.08 will not incur capital/startup and O&M costs beyond the initial year of compliance. Therefore, no capital and O&M costs are estimated for these sources in this ICR.

a – We estimate there 769 (non-exempt) new major source stationary RICE greater than 500 hp and 410 new area source stationary RICE per year. We assume all non-exempt new sources will incur capital costs. (769 + 410 = 1,179 sources) There are an additional 105 exempt new major stationary RICE sources.

b – We estimate an average of 11,096 existing major source stationary RICE greater than 500 hp and 2,250 existing area source stationary RICE per year will have O&M costs over the three-year period of this ICR. (11,096 + 2,250 = 13,346 sources)

c – Each facility can purchase one portable CO monitor and use it for several stationary RICE.

d – We assume that only 366 of the 769 new (non-exempt) major source stationary RICE (>500 hp) have to purchase large CPMS.

The total capital/startup costs for this ICR are $2,857,371. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $24,997,058. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $27,854,429. These are recordkeeping costs. The continuous monitoring costs that are included in this section consist only of those capital/start-up and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6 (d) below.

**6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $31,405,802.

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

 Managerial $62.27 (GS-13, Step 5, $38.92 + 60%)

 Technical $46.21 (GS-12, Step 1, $28.88 + 60%)

 Clerical $25.01 (GS-6, Step 3, $15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2012 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 146,077 existing respondents will be subject to the standard. It is estimated that an additional 1,284 respondents per year will become subject. Further, there are an additional 755,430 respondents that maintain records but do not submit reports. The overall average number of respondents, as shown in the table below, is 902,791 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

| **Number of Respondents** |
| --- |
|  | Respondents That Submit Reports | Respondents That Do Not Submit Any Reports |  |
| Year | (A)Number of New Respondents 1 | (B)Number of Existing Respondents | (C)Number of Existing Respondents that keep records but do not submit reports | (D)Number of Existing Respondents That Are Also New Respondents | (E)Number of Respondents(E=A+B+C-D) |
| 1 | 1,274 | 144,800 | 755,430 | 0 | 901,504 |
| 2 | 1,284 | 146,074 | 755,430 | 0 | 902,788 |
| 3 | 1,294 | 147,358 | 755,430 | 0 | 904,082 |
| Average | 1,284 | 146,077 | 755,430 | 0 | 902,791 |

1 New respondents include 769 major source non-exempt stationary RICE (>500 hp), 105 major source exempt stationary RICE (>500 hp), and 410 area source stationary RICE.

2 Existing respondents include 11,096 major source stationary RICE (>500 hp), 2,250 area source stationary RICE, 86,649 CI engines, 45,633 SI engines, and 446 utilities.

3 Existing respondents that do not submit reports include 738,896 CI engines and 16,534 SI engines.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 902,791.

The total number of annual responses per year is calculated using the following table:

| **Total Annual Responses** |
| --- |
| (A)Information Collection Activity | (B)Number of Respondents | (C)Number of Responses | (D)Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E)Total Annual ResponsesE=(BxC)+D |
| Notification of construction/reconstruction | 1,179 | 1 | 0 | 1,179 |
| Notification of anticipated startup | 1,179 | 1 | 0 | 1,179 |
| Notification of actual startup | 1,179 | 1 | 0 | 1,179 |
| Notification of performance test |  |  |  |  |
|  Quarterly | 1,605 | 4 | 0 | 6,420 |
|  Semiannually | 4,460 | 2 | 0 | 8,920 |
|  Annually | 87 | 1 | 0 | 87 |
| Initial notification of exempt RICE | 105 | 1 | 0 | 105 |
| Initial notification of compliance | 1,179 | 1 | 0 | 1,179 |
| Semiannual compliance report | 119,633 | 2 | 755,430 | 994,696 |
| Annual compliance report | 26,511 | 1 | 0 | 26,511 |
|  |  |  | Total | 1,041,455 |

The number of Total Annual Responses is 1,041,455.

The total annual labor costs are $397,023,127. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal).

**6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 below, respectively, and summarized below.

**(i) Respondent Tally**

The total annual labor hours are 3,427,264 at a cost of $397,023,127. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 3 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $27,854,429. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

**(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 696,903 labor hours at a cost of $31,405,802. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Renewal).

**6(f) Reasons for Change in Burden**

There is a decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The decrease is a result of merging the reporting and recordkeeping requirements for the initial and amendment NESHAP and removing any duplicative burden items. This ICR combines the original final rule and the 2006, 2008, and 2010 amendments, which were previously covered under EPA ICR Number 1975.04, 1975.05, 1975.06, 1975.07, and 1975.08. In addition, this ICR incorporates the requirements for emergencies engines as set forth in the January 2013 Final Rule amendment. This resulted in several changes in the total estimated burden and costs.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 3 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 be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

 To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0340. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0340 and OMB Control Number 2060-0548 in any correspondence.

**Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR**

 **Part 63, Subpart ZZZZ) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden Item** | **A** | **B** | **C** | **D** | **E** | **F** | **G** | **H** |
| **Technical person-hours per occurrence** | **No. of occurrences per respondent per year** | **Technical person-hours per respondent per year** **(AxB)** | **Respondents per year** | **Technical hours per year (CxD)** | **Management hours per year (Ex0.05)** | **Clerical hours per year (Ex0.10)** | **Total cost per year a ($)** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and Studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting Requirements |   |   |   |   |   |   |   |   |
|  A. Read Instructions a | 4 | 1 | 4 | 1,284 | 5,136 | 256.8 | 513.6 | $684,212.78 |
|  B. Required Activities b |   |   |   |   |   |   |   |   |
|  4-SRB >5,000 HP (once per year) | 24 | 1 | 24 | 86 | 2,064 | 103.2 | 206.4 | $274,964.02 |
|  4-SRB ≥5,000 HP (once per year) | 8 | 1 | 8 | 1 | 8 | 0.4 | 0.8 | $1,065.75 |
|  Quarterly performance test (Facilities with Multiple RICE) | 24 | 4 | 96 | 1,605 | 154,080 | 7,704 | 15,408 | $20,526,383.52 |
|  Quarterly performance test (Facilities with One RICE) | 6 | 1 | 6 | 5 | 30 | 1.5 | 3 | $3,996.57 |
|  Semiannual performance test | 24 | 2 | 48 | 4,869 | 233,712 | 11,685.6 | 23,371.2 | $31,134,878.93 |
|  C. Gather Existing Information | Included in 3D |   |   |   |   |   |   |   |
|  D. Write Report |   |   |   |   |   |   |   |   |
|  Notification of construction/reconstruction c | 2 | 1 | 2 | 1,179 | 2,358 | 117.9 | 235.8 | $314,130.40 |
|  Notification of anticipated startup c | 2 | 1 | 2 | 1,179 | 2,358 | 117.9 | 235.8 | $314,130.40 |
|  Notification of actual startup c | 2 | 1 | 2 | 1,179 | 2,358 | 117.9 | 235.8 | $314,130.40 |
|  Notification of performance test b |   |   |   |   |   |   |   |   |
|  Quarterly | 2 | 4 | 8 | 1,605 | 12,840 | 642 | 1,284 | $1,710,531.96 |
|  Semiannually  | 2 | 2 | 4 | 4,460 | 17,840 | 892 | 1,784 | $2,376,626.96 |
|  Annually  | 2 | 1 | 2 | 87 | 174 | 8.7 | 17.4 | $23,180.11 |
|  Initial notification for exempt RICE a | 2 | 1 | 2 | 105 | 210 | 10.5 | 21 | $27,975.99 |
|  Initial notification of compliance c | 2 | 1 | 2 | 1,179 | 2,358 | 117.9 | 235.8 | $314,130.4 |
|  Semiannual compliance report d | 1 | 2 | 2 | 119,633 | 239,266 | 11,963.3 | 23,926.6 | $31,874,777.25 |
|  Annual compliance report e | 1 | 1 | 1 | 25,995 | 25,995 | 1,299.75 | 2,599.5 | $3,463,027.91 |
|  Annual compliance report (Emergency RICE) f |   |   |   |   |   |   |   |   |
|  Utilities  | 16 | 0.33 | 5.33 | 446 | 2,378.67 | 118.93 | 237.87 | $316,883.59 |
|  Curtailment Service Providers  | 1000 | 0.33 | 333.33 | 70 | 23,333.33 | 1,166.67 | 2,333.33 | $3,108,443.33 |
| ***Subtotal for Reporting Requirements*** |   |   |   |   | **835,474** | **$96,783,470** |
| 4. Recordkeeping Requirements |   |   |   |   |   |   |   |   |
|  A. Read Instructions | Included in 3A |   |   |   |   |   |   |   |
|  B. Train Personnel c | 16 | 1 | 16 | 1,179 | 18,864 | 943.2 | 1,886.4 | $2,513,043.22 |
|  C. Continuous Monitoring g |   |   |   |   |   |   |   |   |
|  Portable CO Monitor | 40 | 1 | 40 | 410 | 16,400 | 820 | 1,640 | $2,184,791.6 |
|  Press. and Temp. | 30 | 1 | 30 | 48,323 | 1,449,690 | 72,484.5 | 144,969 | $193,126,252.11 |
|  Record Information  | 1 | 1 | 1 | 768,776 | 768,776 | 38,438.8 | 76,878 | $102,415,569.94 |
| ***Subtotal for Recordkeeping Requirements*** |   |   |   |  | **2,591,790** | **$300,239,657** |
| **TOTAL ANNUAL BURDEN AND COST (ROUNDED)** |   |   |   |   | **3,427,264** | **$397,023,127** |

Assumptions:

a – We estimate an average of 1,284 new sources per year over the three-year period of this ICR. This includes 769 non-exempt major stationary RICE (>500 hp), 105 exempt major stationary RICE (>500 hp), and 410 area sources.

b – The estimated number of sources for these activities was obtained from EPA ICR Number 1975.04.

c – We assume all non-exempt new sources have to complete these activities (1,284 - 105 = 1,179 sources).

d – We assume a 119,633 existing sources have to write semiannual reports. This estimate includes 11,096 existing major source stationary RICE (>500 hp), 2,250 existing area sources, 60,654 existing CI engines, and 45,633 existing SI engines.

e – We assume 25,995 existing CI engines have to complete annual reports. This estimate is based on EPA ICR Number 1975.07.

f – We assume 446 local utilities and 16 hours per annual report, and 70 curtailment service providers with 1,000 hours per report. This estimate is based on the January 2013 Final Rule amendment. Reporting requirements for emergencies RICE will begin in 2016 which is the final year covered in this ICR. Therefore, we assume an average annual occurrence of 0.33 (once every three years) for this ICR.

g – These estimates were obtained from EPA ICR Number 1975.04, 1975.05, 1975.07 and 1975.08.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Stationary Reciprocating Internal Combustion Engines (40**

 **CFR Part 63, Subpart ZZZZ) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden Item** | **A** | **B** | **C** | **D** | **E** | **F** | **G** | **H** |
| **Technical person-hours per occurrence** | **No. of occurrences per respondent per year** | **Technical person-hours per respondent per year** **(AxB)** | **Respondents per year a** | **Technical hours per year (CxD)** | **Management hours per year (Ex0.05)** | **Clerical hours per year (Ex0.10)** | **Total cost per year ($)b** |
| Report review  |   |   |   |  |  |  |  |   |
| Notification of construction/reconstruction | 1 | 1 | 1 | 1,179 | 1,179 | 58.95 | 117.9 | $61,101.09 |
| Notification of anticipated startup | 1 | 1 | 1 | 1,179 | 1,179 | 58.95 | 117.9 | $61,101.09 |
| Notification of actual startup | 1 | 1 | 1 | 1,179 | 1,179 | 58.95 | 117.9 | $61,101.09 |
| Notification of performance test |   |   |   |  |  |  |  |   |
|  Quarterly | 1 | 4 | 4 | 1,605 | 6,420 | 321.00 | 642 | $332,713.29 |
|  Semiannually | 1 | 2 | 2 | 4,460 | 8,920 | 446.00 | 892 | $462,274.54 |
|  Annually | 1 | 1 | 1 | 87 | 87 | 4.35 | 8.7 | $4,508.73 |
| Initial notification for exempt RICE | 1 | 1 | 1 | 105 | 105 | 5.25 | 10.5 | $5,441.57 |
| Initial notification of compliance | 2 | 1 | 2 | 1,179 | 2,358 | 117.9 | 235.8 | $122,202.17 |
| Semiannual compliance report b | 2 | 2 | 4 | 119,633 | 478,532 | 23,926.6 | 47,853.2 | $24,799,681.63 |
| Annual compliance report c | 2 | 2 | 4 | 26,511 | 106,044 | 5,302.2 | 10,604.4 | $5,495,677.28 |
| **TOTAL ANNUAL BURDEN AND COST (rounded)** |   |   |   |  | **696,903** | **$31,405,802** |

**Assumptions:**

a – We estimate an average of 1,284 new sources per year over the three-year period of this ICR. This includes 769 non-exempt major stationary RICE (>500 hp), 105 exempt major stationary RICE (>500 hp), and 410 area sources.

b – We assume a 119,633 existing sources have to write semiannual reports. This estimate includes 11,096 existing major source stationary RICE (>500 hp), 2,250 existing area sources, 60,654 existing CI engines, and 45,633 existing SI engines.

c – We assume 25,995 existing CI engines, 446 local utilizes, and 70 curtailment service providers have to complete annual reports. This estimate is based on EPA ICR Number 1975.07 and the January 2013 Final Rule amendment.