SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal), EPA ICR Number 1071.11, OMB Control Number 2060-0028

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Stationary Gas Turbines (40 CFR part 60, subpart GG) were proposed on October 3, 1977, promulgated on September 10, 1979 (44 FR 52798), and was last-amended on February 24, 2006. These regulations apply to facilities that have stationary gas turbines with a heat input at peak load equal or greater than 10.7 gigajoules per hour (based on the lower heating value of the fuel fired). New facilities include those that commenced either construction, or modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart GG.

In general, all NSPS 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 sources subject to NSPS.

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

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 535 facilities per year will be subject to these standards, and it is estimated that no additional sources per year will becoming subject to these standards in the next three years.

The respondents are all commercial corporations and operated by the stationary gas turbines industry. None of the 535 facilities in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated solely by privately-owned, for-

profit businesses. The burden to the "Affected Public" can be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

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

In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

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

In the Administrator's judgment, sulfur dioxide (SO_2) and nitrogen oxides (NO_x) emissions from stationary gas turbines either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS

was promulgated for this source category at 40 CFR part 60, subpart GG.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation. Specifically, data is being collected on performance of the continuous monitoring systems for sulfur dioxide (SO_2) and nitrogen oxides (NO_x), and any excess emissions or operating parameter exceedances. Recordkeeping is used to document the sulfur and nitrogen content of the fuel; fuel to water ratio; rate of fuel consumption; and ambient conditions. The fuel sulfur content and fuel to water ratio measurements are used to monitor SO_2 and NO_x emissions, respectively.

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 GG.

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, duplication does not exist.

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 <u>Federal Register</u> (78 <u>FR</u> 33409) on June 4, 2013. No comments were received on the burden published in the <u>Federal Register</u>.

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 consultations with the Agency's internal industry experts. Approximately 535 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Electric Power Research Institute, at (650) 855-2121; and 2) the American Petroleum Institute, at (202) 682-8482.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first <u>Federal Register</u> 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.

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 stationary gas turbines. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes are listed below for this source category.

40 CFR Part 60, Subpart GG	SIC Codes	NAICS Codes
Other Food Crops Grown Under Cover	0182	111411
Gas and Petroleum Extraction	1311	211111
Natural Gas Liquids Extractions	1321	211112
Crushed and Broken Limestone Mining and Quarrying	1422	212312
All Other Special Trade Contractors	1799	235990
Breakfast Cereal Manufacturing	2043	311230
Chewing Gum	2067	311340
Soybean Oil Mills	2075	311225
Shortening, Table Oils, Margarine, and other Edible Fats and Oils	2079	311225
Malt Beverages	2082	312120
Narrow Fabric and other Small Ware Mills	2241	313221
Non-woven Fabrics	2297	313230
Pulp Mills	2611	322110
Paper Mills	2621	322121
Corrugated and Solid Fiber Boxes Manufacturing	2653	322211

40 CFR Part 60, Subpart GG	SIC Codes	NAICS Codes
Alkalies and Chlorine Manufacturing	2812	325181
Inorganic Dye and Pigment Manufacturing	2816	325131
Plastics Material and Synthetic Resins and Non-vulcanizable Elastomers	2821	325211
Medical Chemicals and Botanical Products	2833	325411
Pharmaceutical Preparations	2834	325412
Cycle Organic Crude and Intermediates, and Organic Dyes and Pigments	2865	325110
Industrial Organic Chemicals	2869	325110
Nitrogenous Fertilizers	2873	325311
Paint and Coating Manufacturing	2899	325510
Petroleum Refineries	2911	324110
Other Aluminum Rolling and Drawing	3357	331319
Copper Wire Drawing	3357	331422
Electroplating, Plating, Polishing, Anodizing, and Coloring	3471	332813
Turbine and Turbine Generator Set Unit Manufacturing	3511	333611
Aircraft Engines and Engine Parts Manufacturing	3724	336412
Travel Trailer and Camper Manufacturing	3799	336214
All Other Miscellaneous Chemical Product and Preparation Manufacturing	3999	325998
Airports, Flying Fields, and Airport Terminal Services	4581	488119
Pipeline Transportation of Refined Petroleum Products	4613	486910
All Other Pipeline Transportation	4619	486990
Wired Telecommunication Carriers	4813	513310
Fossil Fuel Electric Power Generation	4911	221112
Pipeline Transportation of Natural Gas	4922	486210
Natural Gas Transmission and Distribution	4923	221210
Natural Gas Distribution	4924	221210
Mixed, Manufactured, or Liquified Petroleum Gas Production and/or Distribution	4925	221210
Fossil Fuel Electric Power Generation	4931	221112
Gas and Other Services Combined	4932	221210

40 CFR Part 60, Subpart GG	SIC Codes	NAICS Codes
Fossil Fuel Electric Power Generation	4939	221112
Sewage Treatment Systems	4952	221320
Material Recovery Facilities	4953	562920
Solid Waste Combustors and Incinerators	4953	562213
Steam and Air-conditioning Supply	4961	221330
Plumbing and Heating Equipment Supplies (Hydronics) Wholesalers	5074	421720
Other Groceries and Related Products Wholesalers	5149	422490
Petroleum Bulk Stations and Terminals	5171	422710
Offices of Real Estate Agents and Brokers	6531	531210
General Medical and Surgical Hospitals	8062	622110
Colleges, Universities, and Professional Schools	8221	611310
Testing Laboratories	8734	541380
Other Scientific and Technical Consulting Services	8999	541690
Police Protection	9221	922120
Administration of Public Health Programs	9431	923120
National Security	9711	928110

4(b) Information Requested

(i) Data Items

In this ICR, all the data recorded or reported is required by the NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG).

A source must make the following reports:

Notifications						
Notification to construct/reconstruct	60.7(a)(1)					
Notification of actual startup	60.7(a)(3)					
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)					
Notification of performance test	60.8(a)					
Notification of sources with continuous monitoring systems	60.7(a)(5)					

Notifications					
Reports					
Report on initial performance test results 60.8(a)					
Report of excess emissions and monitoring systems performance	60.7(c), 60.334(c)				

A source must keep the following records:

Recordkeeping						
Maintain records of startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)					
Maintain records of fuel consumption and fuel to water ratio in the turbine, for sources using water injection to control NO ₂ emissions	60.334(a)					
Maintain records of sulfur and nitrogen content of fuel used in turbine	60.334(b)					
Maintain records of all measurements, including continuous monitoring system, monitoring device, performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks	60.7(f)					
Maintain all records for two years	60.7(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 5 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for NO _x and SO ₂ , or for pressure drop and liquid supply pressure for water injection NO _x control devices.

Respondent Activities

Perform initial performance test, Reference Method 20 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

Observe initial performance tests and repeat performance tests if necessary

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 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 two years.

5(c) Small Entity Flexibility

The majority of 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. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (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 68,447 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 NSPS program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial \$123.04 (\$58.59+ 110%)
Technical \$101.22 (\$48.20 + 110%)
Clerical \$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

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 such activities 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 \$221,800.

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), 2013 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 – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (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 535 existing respondents will be subject to the standards. It is estimated that no additional respondents per year will become subject to these standards. The overall average number of respondents, as shown in the table below, is 535 per year.

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

	Number of Respondents									
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	0	535	0	0	535					
2	0	535	0	0	535					
3	0	535	0	0	535					
Average	0	535	Û	0	535					

¹ New respondent include sources with constructed, reconstructed and modified affected facilities

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 535.

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 Responses E=(BxC)+D				
Notification of construction/ reconstruction	0	1	0	0				
Notification of actual startup	0	1	0	0				
Notification of initial performance test	0	1.2	0	0				
Notification of demonstration of CMS	0	1	0	0				
Semiannual report	535	2	0	1,070				
Total Number of Annual Responses			Total	1,070				

The number of Total Annual Responses is 1,070.

The total annual labor costs are \$6,695,243. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 68,447 hours at a cost of \$6,695,243. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 64 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are zero.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 4,922 labor hours at a cost of \$221,800. See below Table 2: Average Annual EPA Burden and

Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the number of affected facilities or the number of burden hours as currently identified in the OMB Inventory of Approved Burdens.

There is, however, an increase in the estimated labor costs for industry and a decrease in the estimated labor costs for the Agency compared to the previous ICR. This is not due to any program changes. They are a result of updated industry labor rates, which resulted in an increase in industry labor costs; and a mathematical correction to the Agency cost estimate in the previous ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 64 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-2013-0313. 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), WJC 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-2013-0313 and OMB Control Number 2060-0028 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person/ hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	1	1	1	0	0	0	0	\$0
B. Required activities ^c								
Initial performance test	110	1	110	0	0	0	0	\$0
Repeat performance test ^d	110	0.2	22	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction c	2	1	2	0	0	0	0	\$0
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	1.2	2.4	0	0	0	0	\$0
Notification of demonstration of CMS ^c	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Excess emission and exemption reports ^e	10	2	20	535	10,700	535	1,070	\$1,203,639.26
Subtotal for Reporting Requirements						12,305		\$1,203,639.26
4. A. Read instructions	See 3A							
B. Plan activities	See 4C							
Implement activities	See 3							
Develop record system	N/A							
C. Time to check computer system and calibrate	0.25	365	91.25	535	48,819	2,440.95	4,881.9	\$5,491,604.10
continuous monitor								
D. Train personnel	N/A							
E. Audits	N/A							
Subtotal for Recordkeeping Requirements						56,142		\$5,491,604.10
TOTAL LABOR BURDEN AND COST (rounded)						68,447		\$6,695,243

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 535 existing sources. There will be no additional sources over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "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.
- We have assumed that there will be no new sources expected over the three-year period of this ICR.
- ^d We have assumed that 20 percent of respondents will have to repeat initial performance test due to failure.
- ^e We have assumed that each respondent will take 10 hours two time per year to write the excess emissions and exemption reports.
- ^f We have assumed that it will take each respondent 25 minutes 365 days per year to check computer system and calibrate continuous monitor.

Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Performance test								
New plants ^c	24	1.2	28.8	0	0	0	0	\$0
2. Report review								
Notification of construction ^c	2	1	2	0	0	0	0	\$0
Notification of actual startup ^c	0.5	1	0.5	0	0	0	0	\$0
Notification of initial test ^c	0.5	1	0.5	0	0	0	0	\$0
Notification of CMS demonstration ^c	0.5	1	0.5	0	0	0	0	\$0
3. Semiannual reports								
Excess emissions and exemption reports ^d	4	2	8	535	4,280	214	428	\$221,799.87
TOTAL LABOR BURDEN AND COST (rounded)						4,922	·	\$221,800

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 535 existing sources. There will be no additional sources over the three-year period of this ICR.

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

^c We have assumed that there will be no new sources expected over the three-year period of this ICR

^d We have assumed that each respondent will take 4 hours two times per year to complete the excess emissions and exemption reports.