

**Supporting Statement A**  
**Air Quality, 30 CFR Part 550, Subparts A, B, and C**  
**OMB Control Number 1010-New**

**Terms of Clearance:**

**General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, "Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

**Justification**

***1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.***

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. § 1331 *et seq.* and 43 U.S.C. § 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. Such rules and regulations apply to all operations conducted under a lease, pipeline right-of-way, lease-term pipeline, or a right-of-use and easement.

Sections 11 and 25 of the amended OCS Lands Act require the holders of OCS oil and gas or sulphur leases to submit Exploration plans (EPs) and Development and production plans (DPPs) to the Secretary for approval prior to commencing these activities. Section 1332(6) states that "operations in the [O]uter Continental Shelf should be conducted in a safe manner by well-trained personnel using technology, precautions, and techniques sufficient to prevent or minimize . . . occurrences which may cause damage to the environment or to property, or endanger life or health." Section 1334(a)(8) requires that regulations prescribed by the Secretary include provisions "for compliance with the national ambient air quality standards [NAAQS] pursuant to the Clean Air Act (42 U.S.C. 7401 *et seq.*), to the extent that activities authorized under this subchapter [Act] significantly affect the air quality of any State."

This authority and responsibility have been delegated to the Bureau of Ocean Energy Management (BOEM), which administers these provisions in accordance with its regulations at 30 CFR Part 550, Subparts A, B, and C. BOEM regulations require the submission of information on projected air emissions with each proposed plan for exploration or development of oil, gas or sulfur on the OCS. As part of the submission, BOEM requires that the submitter evaluate whether the activities conducted under the proposed plan will be above or below a BOEM-defined exemption threshold used to determine whether air quality impacts would be *de minimus* or whether additional review or emission reduction measures are required. In the event that the proposed emissions exceed the exemption threshold, BOEM requires modeling

of the non-exempt emissions and their potential impacts to air quality onshore. Depending on the level of emissions described in the proposed plan, BOEM would require the control of emissions from any facility that would otherwise cause an exceedance of national ambient air quality standards onshore.

In order to ensure ongoing lessee and operator compliance with the national ambient air quality standards, the proposed regulations would authorize BOEM to collect additional information on activities conducted by lessees and operators under plans that have previously been approved. In addition, the rule would formalize the existing mechanism used by BOEM in the Gulf of Mexico OCS Region (i.e., Gulf-wide Offshore Activities Data System or GOADS, which will be renamed as the BOEM System or BOADS) to require the reporting of information that the EPA needs for the maintenance of its national emissions inventory and which BOEM needs for its NEPA and other environmental analyses. The existing GOADS reporting requirements would be authorized to be extended to other affected OCS Regions.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior's implementing policy, BOEM is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those that accrue to the public at large. Platform applications are subject to cost recovery, and BOEM regulations specify service fees for these requests.

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.***

In general, BOEM uses the information collected to ensure that:

- There is no threat of serious, irreparable, or immediate damage to the marine environment caused by OCS oil and gas exploration, development, and production activities;
- Operations are conducted according to all applicable regulations, permit conditions and requirements, and in a safe and workmanlike manner;
- OCS oil and gas operations are conducted in a manner that minimizes air pollution from the OCS in adjacent onshore areas and do not exceed required emission levels for key pollutants; and
- Air emissions and related information comply with the NAAQS and regional haze regulations.

The EPA has promulgated national ambient air quality standards (NAAQS) for ozone, fine (i.e., < 2.5 micron) and coarse particulate matter ((i.e., > 2.5 micron), lead, nitrous oxides, sulfur oxides and carbon monoxide, as well as various precursor pollutants, most notably volatile organic compounds. BOEM's regulations are intended to ensure that the EPA's ambient air standards for the concentrations of these emissions are adhered to and that offshore oil and gas operations do not unduly impact the air quality onshore.

The EPA has also promulgated standards and regulations for regional haze for certain Class I

and Class II areas within the Gulf of Mexico and the Alaska OCS. With respect to areas potentially affected by OCS operations, the Fish and Wildlife Service and the National Park Service enforce the haze standards on behalf of EPA and BOEM. Air emissions and related information is needed to determine compliance with the NAAQS and regional haze regulations.

In preparation for usage by States and regional planning organizations, affected respondents are required to collect and report relevant air pollutant emissions data for OCS activities. This data will be used in future regional air quality modeling in support of revisions to State Implementation Plans and to other air quality evaluations and reviews.

In the Pacific, lessees are required to file Episode Avoidance Plans (EAPs) with their local air quality agencies in response to California air quality laws (required by EPA) to protect public health during exceptional air pollution episodes. BOEM authorizes pre-approval to postpone certain testing and operational activities during air pollution emergency episodes provided respondents submit to BOEM a copy of their EAP when submitted to the local air agencies. We review these EAPs prior to the event of an air pollution episode to ensure that abatement measures described therein do not jeopardize safe platform operations.

***Form Modifications for BOEM-0138 and BOEM-0139:***

For this rulemaking, we will also be modifying current forms BOEM-0138 (GOM Air Emission Calculations for Exploration Plans) and BOEM-0139 (GOM Air Emission Calculations for Development Production Plans (DPPs) and Development Operations Coordination Documents (DOCs)) to accommodate the proposed new and expanded air emissions requirements. Under current regulations, these forms are submitted to standardize the way potential air emissions are estimated and approved as part of the OCS plans for the Gulf of Mexico Region. BOEM uses the data from these forms to determine the effect of air emissions on the environment. These forms consist of:

- A list of appropriate emissions factors to be used in calculating the proposed air emissions for various types of equipment;
- A list of key operational activities, such as drilling or facility installation;
- Location information applicable to all fixed facilities;
- Information on fuel consumption;
- A distribution of estimated air pollutant outputs, by type of activity and type of equipment; and
- A summary page that describes and calculates the estimated total emissions from any given activity.
- Respondents are asked to categorize emissions into 9 factors: natural gas prime movers, diesel-fired prime movers, heaters/boilers/firetubes/NG-fired, gas flares, liquid flares, tanks, fugitives, glycol dehydrator vent, and gas venting.

The rulemaking will modify the forms to accommodate the situations in each affected OCS Region, not just the Gulf of Mexico. A summary of the major changes that BOEM is proposing for these forms follows:

- The forms will be generalized so as to be equally applicable and functional for all affected OCS Regions, including Alaska;

- The emissions factors to be used to calculate projected equipment will be updated and new emissions sources and emissions categories will be added;
- The types of vessels and equipment used will be updated and expanded (e.g., including icebreakers);
- The emissions reporting will be updated to include both total and allocated emissions for support vessels (to provide for data audit/review);
- Venting and fugitive emissions reporting will be added;
- The forms will be restructured to better accommodate the consolidation of emissions across related facilities (i.e., multi-facility emissions);
- Particulate matter will be disaggregated to accommodate the corresponding changes in EPA reporting and monitoring requirements;
- The forms will be adjusted to accommodate reporting of emissions on the basis of peak intervals other than on an annual basis (such as hourly, 24-hour, etc.);
- The primary reporting interval for emissions will be modified from an annual basis to a 12-month rolling sum (to better account for peak emissions and to ensure that the reported “worst case” emissions are never below the actual amounts); and
- The forms will be renamed to reflect the national scope (BOEM-0138, Air Emission Calculations for EPs, and BOEM-0139, Air Emission Calculations for DPPs and DOCDs).

BOEM is working with a contractor to revise the forms to provide automated calculations after data entry. This work is still in progress; therefore, BOEM has drafted a mockup of the forms showing all the data fields; these mockups will be available for review purposes.

The proposed air quality requirements and associated modifications to the forms will increase the currently approved hour burdens for total plan submissions. Currently, the aggregate burden is 600 hours for submitting an EP and 700 hours for a DOCD/DPP (30 CFR 550, Subpart B, OMB Control Number 1010-0151). These burdens include all the required activities and reports for these plans. BOEM estimates that the new and expanded air quality requirements will have the effect of increasing the current burdens for plans and associated forms by the following:

<i>Plan Action</i>	<i>Current Hour Burden</i>	<i>Estimated Hour Increase</i>	<i>Proposed Hour Burden</i>
Initial EP Submission	600	20	620
Revised EP	150	25	175
Initial DOCD/DPP Submission	700	20	720
Revised DOCD/DPP	235	25	260

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

BOEM estimates that 70 percent of all plan information related to the air quality review is currently submitted in an electronic format to Gulf of Mexico Region. BOEM forms are all available electronically and most lessees and operators submit the information in an Excel

spreadsheet.

With respect to the BOADS (BOEM Offshore Activities Data System) process, which involves the creation of a comprehensive inventory of all air emissions sources, BOEM has provided respondents with the appropriate software. Therefore, for the BOADS emissions inventory reporting, 100 percent of the data has been and will be submitted electronically.

In the Pacific and Alaska Regions, 50 percent of the respondents submit the required information for initial review and approval electronically. These Regions do not currently have the ability to process all of the data electronically due to systems compatibility issues. An effort is underway to automate the process by which exploration and development plans are submitted. Once that effort is implemented, we expect that all the air quality information required by those Regions will also be submitted electronically.

***4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.***

In the area of air quality, authority to regulate OCS air emissions is split between the Department of the Interior (DOI) and the Environmental Protection Agency (EPA). This split in the jurisdiction related to the monitoring of air quality is a result of the 1990 amendments to the Clean Air Act (Pub. L. 101-549). Specifically, section 328 gives EPA the authority to regulate OCS air emissions for OCS areas except in the Central and Western Gulf of Mexico and in the Arctic OCS.

There is no duplication of effort with respect to reporting or analysis of air emissions because the EPA regulates emissions on some of the OCS and DOI regulates the air emissions for other parts of the OCS. In addition, DOI provides the data it collects to the EPA for their use in populating the national emissions inventory. These regulations are effective in avoiding duplication in Federal regulations and reporting. Similar information is not available because the information is unique for each emission source and data and information cannot be obtained elsewhere.

***5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.***

Many of the OCS lessees and operators have less than 500 employees and are considered small businesses, as defined by the Small Business Administration. This collection of information could have a significant economic effect on a substantial number of small entities. However, the activities to which this information collection applies are subject to statutorily mandated controls designed to protect the environment and ensure that the air quality of potentially affected States is not adversely affected by OCS activities. The hour burden on any small entity subject to these regulations cannot be reduced beyond current levels without impairing the ability of the agency to comply with its statutory mandates.

***6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

If BOEM did not collect the information, it could not fulfill DOI's mandate from the OCS Lands Act to ensure safe and environmentally sound operations in the OCS. BOEM would not have the ability to determine if OCS operations comply with standards to minimize air pollution and avoid causing a significant adverse effect to adjacent onshore areas. BOEM's failure to collect this information would also adversely affect the States, as the emissions of air pollutants generated on the OCS could adversely affect their ability to comply with the federally mandated State Implementation Plans with respect to maintaining onshore ambient air quality levels in compliance with EPA standards.

The information collected is unique to each facility. With the exception of the information discussed in section A.7, the frequency is generally on the occasion of a proposed plan; thus, a lesser frequency is not possible.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

***(a) requiring respondents to report information to the agency more often than quarterly;***

In the rare situations where such reporting is required (i.e., from large emitters of air pollutants), monthly reporting is necessary to continuously monitor air emissions and record meteorological measurements from selected OCS sites. Some of the EPA air quality standards apply to peak hourly and 24-hour emissions, which cannot be determined on the basis of quarterly reporting only.

Monthly information is not routinely collected from lessees and operators, but only when conditions or circumstances warrant or for special studies that are mandated. Daily and/or every third day inspection of certain facilities and recordkeeping for pollution may be necessary to detect if pollution is occurring so that immediate corrective action can be taken.

***(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***

***(c) requiring respondents to submit more than an original and two copies of any document;***

***(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;***

***(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***

***(f) requiring the use of statistical data classification that has been reviewed and approved by OMB;***

***(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***

***(h) requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.***

Not applicable in this collection.

**8. If applicable, provide a copy and identify the note and page number of publication in the**

***Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.***

***Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***

As required in 5 CFR 1320.11, BOEM is providing for and has described the 60-day review and comment process in the preamble of the proposed rule. We will address comments received on the information collection in the final rulemaking process.

***9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.***

We will not provide payment or gifts to respondents in this collection.

***10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.***

BOEM will protect proprietary information according to 30 CFR 550.197, "Data and information to be made available to the public or for limited inspection," and the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2).

***11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.***

The collection does not include sensitive or private questions.

***12. Provide estimates of the hour burden of the collection of information. The statement should:***

***(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour***

**burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

**(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

Potential respondents include Federal oil, gas, and sulphur lessees and/or operators and States. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responses are mandatory and are submitted on occasion.

We estimate a total reporting and recordkeeping annual burden of 146,490 hours for the rulemaking. Some of the requirements are not new; they are being moved and/or expanded. The table below provides a breakdown of the estimates for the rule. Expanded requirements and hours are shown in italics; the proposed new requirements are shown in bold. Subpart C is a total rewrite so all the requirements are addressed as new.

### BURDEN TABLE

[Current requirements in regular font; *expanded* requirements shown in *italic font*; **new** requirements shown in **bold font**]

Citation 30 CFR 550 Subpart A and Related NTLs	Reporting and Recordkeeping Requirement**	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
Per the requirements in this rule, you must submit information in an electronically readable format unless otherwise directed by BOEM. If you transmit the information electronically, you must use a delivery medium or transmission method authorized by BOEM.				
<b>Information and Reporting Requirements</b>				
141(d)	Request approval to use new or alternative procedures; <i>temporarily suspend equipment or implement operational control(s)</i> ; submit required information.	Burdens currently covered under 30 CFR 550, subpart A (1010-0114).		0
160(f)	<i>Submit all air quality documentation/records pertaining to RUE applications; obtain approvals.</i>	11	26 <i>applications</i>	286
160(f)	<i>Request waiver of 10-year periodic review for RUEs from Regional Supervisor.</i>	.50	2	1
<b>New 187*</b>	Entities in all affected OCS Regions collect, maintain, retain for 10 yrs., and all air emissions-related data for each source that generates air pollutants on the OCS.	<b>43+</b>	<b>2,547 submissions</b>	<b>112,025</b>
<b>New 187(b)*</b>	Request third-party submission of required air emissions data to BOEM or BOEM-designated agent.	<b>2</b>	<b>200 requests</b>	<b>400</b>
<b>Total for Subpart A</b>			<b>2,775 Responses</b>	<b>112,712 Hours</b>
<b>Citation</b>	<b>Reporting and Recordkeeping</b>	<b>Hour</b>	<b>Average</b>	<b>Annual</b>



<b>30 CFR 550 Subpart B and Related NTL(s)</b>	<b>Requirement</b>	<b>Burden</b>	<b>No. of Annual Responses</b>	<b>Burden Hours</b>
<b>Contents of Exploration Plans</b>				
200-206; 209; 215(e); 231(b); 232(d); 234; 235; 281(d)(3); 283; 284; 285; NTL 2010 N-06	Submit amended, modified, revised, supplemental, <i>or updated</i> EP, or resubmit disapproved EP; withdraw an EP.	Burdens currently covered under 30 CFR 550, subpart B (1010-0151).		0
<b>New 205</b>	Collect, maintain & submit all air quality & modeling documentation/records (including but not limited to, emissions sources, factors, reduction measures, attributed and projected emissions, distance calculations, etc.); additional documentation as requested/required by BOEM; request departures; obtain approvals.	<b>20</b>	<b>110 changed plans</b>	<b>2,200</b>
200-206; 209; 211 thru 228; NTL 2010-N-06	Submit EP and all required information (including, but not limited to, submissions required by BOEM <i>forms 0137, 0138, 0142</i> ; withdrawals; lease stipulations; reports; H <sub>2</sub> S; Geological and Geophysical (G&G); etc.); provide notifications.	Burdens currently covered under 30 CFR 550, subpart B (1010-0151).		0
<b>New 205</b>	Submit expanded air emissions & compliance data for EPs whose air emissions are above the exemption threshold. <i>Burdens for analysis/modeling covered under 30 CFR 550, subpart C (§§ 550.303-307).</i>	25	20 plans	500
	Collect, maintain & submit all air quality & modeling documentation/records (including but not limited to, emissions sources, factors, reduction measures, attributed and projected emissions, distance calculations, etc.); additional documentation as requested/required by BOEM; request departures; obtain approvals.			
	Alaska Region submits air quality information as required in EP.	200	2 Alaska plans	400
<b>Subtotal</b>			<b>132 Responses</b>	<b>3,100 Hours</b>
<b>Contents of DPP and DOCD</b>				
Current 200-206; 209; 266(b); 267(d); 272(a); 273; 281(d); 283(a-b); 284; 285(a-b); NTL 2010 N-06	Submit amended, modified, revised, updated, or supplemental DPP or DOCD, or resubmit disapproved DPP or DOCD.	Burdens currently covered under 30 CFR 550, subpart B (1010-0151).		0
<b>New 205</b>	Collect, maintain & submit all air quality & modeling documentation/records (including but not limited to, emissions sources, factors, reduction measures, attributed and	<b>20</b>	<b>155 changed plans</b>	<b>3,100</b>

	projected emissions, distance calculations, etc.); additional documentation as requested/required by BOEM; request departures; obtain approvals.			
200-206; 209; 241 thru 262; NTL 2010 N-06, and others	Submit DPP/DOCD and accompanying/supporting information (including, but not limited to, submissions required by BOEM <i>Forms 0137, 0139, 0142</i> used in GOM; lease stipulations; withdrawals, etc.); provide notifications.	Burdens currently covered under 30 CFR 550, subpart B (1010-0151).		0
New 205	Submit expanded air emissions & compliance data for DPPs/DOCDs whose air emissions are above the exemption threshold. <i>Burdens for analysis/modeling covered under 30 CFR 550, subpart C (§§ 550.303-307).</i>	25	50 plans	1,250
	Collect, maintain & submit all air quality & modeling documentation/records (including but not limited to, emissions sources, factors, reduction measures, attributed and projected emissions, distance calculations, etc.); additional documentation as requested/required by BOEM; request departures; obtain approvals.			
	Alaska Region submits air quality information as required in DPP/DOCD.	400	2 Alaska plans	800
284	Submit updated information on activities conducted under approved EPP/DPP/DOCD/RUE.	4	56 updates	224
<b>Subtotal</b>			<b>263 Responses</b>	<b>5,374 Hours</b>
<b>Total Subpart B</b>			<b>395 Responses</b>	<b>8,474 Hours</b>
Citation 30 CFR 550 Subpart C and Related NTL(s)	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Costs		
<b>Air Quality Analyses in Plans</b>				
New 303-307	Conduct required analysis & modeling for expanded air emissions for those criteria & major precursor air pollutants that exceed the threshold & compliance requirements. Submit modeling reports.	38	87 plans	3,306
		\$10,000 x 20 instances for incremental modeling/analysis cost of mobile sources = \$200,000		\$1,000,000
		\$20,000 x 40 instances for additional plans that will now require modeling/analysis = \$800,000		
		\$50,000 x 0 instances for plans now requiring photochemical modeling/analysis = no costs till 2020		
New 303(d)	Report/consolidate air emissions data from	20	15 consolida-	300

	multiple facilities if required.		<b>sions</b>	
<b>New 303(g); 310(c); 312(b)</b>	Submit revised air emissions plans, as required. Request exceptions; obtain approvals.	Burdens currently covered under 30 CFR 550, subpart B (1010-0151).		0
<b>New 303(h)</b>	Provide additional information/analysis as required for plan approval.	<b>10</b>	<b>300 submissions</b>	<b>3,000</b>
<b>New 304</b>	Obtain approval of all modeling protocols & meteorological data sets. Provide BOEM with copies of/access to protocols & all required information.	5	4 submissions	20
<b>Subtotal</b>			<b>406 Responses</b>	<b>6,626 Hours</b>
			<b>\$1,000,000 Non-hour Costs</b>	
<b>Emission Reduction Measures—BACT</b>				
<b>New 306; 307; 308(a); 309(a), (c), (d)</b>	Document results of ERM analysis. Provide description of BACT proposal/data based on required analyses, associated impacts and costs; demonstrating compliance; provide additional information as required; obtain approval; Submit ECE data from manufacture.	<b>50</b>	<b>12 submissions</b>	<b>600</b>
<b>New 307(a); 313(a)</b>	Request VOCs or NO <sub>x</sub> waiver for ERM.	<b>1</b>	<b>1</b>	<b>1</b>
<b>New 308(b); 309(a)</b>	Request reconsideration of BOEM emissions determination; submit supporting information.	Not considered IC as defined in 5 CFR 1320.4(a) (2).		0
<b>New 309(b)</b>	Immediately notify BOEM if ERM become disabled or unavailable; request extension for ERM (NTE 90 days).	2	2 notifications	4
<b>New 309(d)</b>	Collect and maintain monthly logs of relevant meter/monitoring equipment readings.	12/yr.	6	72
<b>New 309(e)</b>	Notify appropriate State air quality control jurisdiction of proposal to acquire emissions offsets; revise State Implementation Plan to include new info; submit to BOEM.	1	1 notification	1
<b>New 310(b)</b>	Request a departure from compliance with the new or revised ambient air standard.	2	2 requests	4
<b>New 310(c)</b>	Resubmit plans for air quality review every 10 years w/ required information.	There will be no burden until 2020		0
<b>Subtotal</b>			<b>24 Responses</b>	<b>682 Hours</b>
<b>Monitoring &amp; Reporting</b>				
<b>New 311(a), (b), (f)</b>	Report/demonstrate actual emissions data/other information to verify compliance with previous approved plan on BOEM approved schedule.	<b>16</b>	<b>12 sub-missions</b>	<b>192</b>
<b>New 311(c)</b>	Measure actual emissions using Predictive Emission Monitoring System (PEMS).	<b>36</b>	<b>30 engines</b>	<b>1,080</b>
		<b>\$26,000 x 30 engines = 780,000 annually</b>		
<b>New 311(c)</b>	Report data/information regarding exceedance of projected emissions to BOEM.	<b>16</b>	5	<b>80</b>
<b>New 312(b), (d);</b>	Submit additional information as required to BOEM.	2	10 submissions	20
<b>New 312(a)</b>	Conduct/report stack testing results every 3 yrs.	<b>48</b>	<b>67 tests</b>	<b>3,216</b>
		<b>\$25,000 x 67 stack tests = \$1,675,000</b>		

		<b>annually</b>		
<b>New 312(b)</b>	Retain monthly fuel information for each source on determined schedule for 10 yrs.	<b>48</b>	<b>265</b>	<b>12,720</b>
<b>New 312(b)</b>	Submit fuel logs or collect facility and equipment usage information for MSCs to BOEM.	<b>8</b>	<b>80</b>	<b>640</b>
<b>New 312(c), (d)</b>	Collect/report meteorological data in a manner described by BOEM or from agreed location; other information as required.	<b>4</b>	<b>3</b>	<b>12</b>
<b>New 313(b)</b>	Submit new air quality plan for short-term facility converted to a long-term facility.	<b>10</b>	<b>2 submissions</b>	<b>20</b>
<b>New 313(b)</b>	Request exception due to adverse weather conditions or circumstances beyond your control.	<b>.50</b>	<b>4</b>	<b>2</b>
<b>New 314</b>	Provide pollution data to State, Indian Tribe, or federal agency requests submit additional info. for determination to any cause/contribution to NAAQS violation within 120 days or a longer time specified by BOEM.	<b>2</b>	<b>2 requests</b>	<b>4</b>
<b>Subtotal</b>			<b>480 Responses</b>	<b>17,986 Hours</b>
			<b>\$2,455,000 Non-hour Costs</b>	
<b>General</b>				
<b>New 300-314</b>	General departure and alternative compliance/requests not specifically covered elsewhere in subpart C.	<b>2</b>	<b>5 requests</b>	<b>10</b>
<b>Subtotal</b>			<b>5 Responses</b>	<b>10 Hours</b>
<b>Total for Subpart C</b>			<b>915 Responses</b>	<b>25,304 Hours</b>
			<b>\$ 3,455,000 Non-Hour Costs</b>	
<b>Citation 30 CFR 550 Subpart J and Related</b>	<b>Reporting and Recordkeeping Requirement</b>	<b>Hour Burden</b>	<b>Average No. of Annual Responses</b>	<b>Annual Burden Hours</b>
1012	Collect, maintain & submit all air quality documentation/records pertaining to pipeline ROW applications; obtain approvals.	Burden covered under 30 CFR 550, subparts B and C.		0
<b>Total Burden</b>			<b>4,085 Responses</b>	<b>146,490 Hours</b>
			<b>\$3,455,000 Non-Hour Costs</b>	

\* The requirements and burdens added to 30 CFR 550, subpart A, are not entirely new; they are in current 30 CFR Part 550, subpart C. This rulemaking moves those requirements to subpart A.

\*\* In the future, BOEM will be allowing the option of electronic reporting for certain requirements.

+ Exact numbers of responses and annual burden hours were approved by OMB January 2015; numbers are from ROCIS.

***(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "annual Cost to the Federal Government."***

The average respondent cost is \$77/hour. This cost is broken out in the below table using the

Bureau of Labor Statistics data for the West South Central United States. See BLS<sup>1</sup> website: <http://data.bls.gov/cgi-bin/dsrv?nw>

Position	Level	Hourly Pay rate (\$/hour estimate rounded)	Hourly rate including benefits (1.4 <sup>2</sup> x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour rounded)
Secretaries and Administrative Assts.	6	\$21.19	\$29.67	15%	\$4
Regulatory Specialists <sup>3</sup>	14	\$84.38	\$118.13	15%	\$18
Air Quality Specialists/Engineers <sup>4</sup>	All workers	\$54.65	\$76.51	65%	\$50
Supervisory Engineers	13	\$76.22	\$106.71	5%	\$5
<b>Weighted Average (\$/hour)</b>					<b>\$77</b>

<sup>1</sup> Note that this BLS source reflects their last update from December 2009.

<sup>2</sup> A multiplier of 1.4 (as implied by BLS news release USDL 15-2329, December 9, 2015) was added for benefits.

<sup>3</sup> Management BLS occupation.

<sup>4</sup> Environmental scientists and geoscientists BLS occupation.

Based on a cost factor of \$77 per hour, we estimate the hour burden as a dollar equivalent is \$11,279,730 (\$77 x 146,490 hours = \$11,279,730).

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in Item 12).**

**(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

**(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

**(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

We estimate the total non-hour cost burden for this rulemaking to be \$3,455,000. The rulemaking (§§ 550.303-307) will account for the costs of modeling services, when required (\$10,000 for incremental, \$20,000 for additional, and \$50,000 for photochemical modeling). See the burden table in A.12 for a breakdown of these costs.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The average government cost is \$66/hour. This cost is broken out in the below table using the Office of Personnel Management Salary Table 2016-RUS (Consisting of the portions of the lower 48 United States not located within another locality pay area <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

Position	Grade	Hourly Pay rate (\$/hour estimate rounded)	Hourly rate including benefits (1.5*\$ /hour rounded)	Percent of time spend on collection	Weighted Average (\$/hour)
Meteorologist/Physical Scientist	GS-13/5	\$45.86	\$68.79	55%	\$38
Physical Scientist	GS-12/5	\$38.56	\$57.84	40%	\$23
Supv. Physical Scientist	GS-15/5	\$63.74	\$95.61	5%	\$ 5
<b>Weighted Average (\$/hour)</b>					<b>\$66</b>

\*A multiplier of 1.5 (as implied by BLS news release USDL 15-2329, December 9, 2015, was added for benefits.

To analyze and review the information respondents submit, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by respondents. Based on a cost factor of \$66 per hour, the total the cost to the Government is \$4,834,170 (146,490 hours x 0.5 = 73,245 hours x \$66 = \$4,834,170).

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

This is a new collection; therefore, BOEM is requesting a program increase of 146,490 hours and \$3,455,000 non-hour cost burdens for the new and expanded requirements in the rulemaking.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

We will not tabulate and publish the individual responses. We will make the information reported under §§ 550.187 and 550.314 available both to the States for use in preparing their State Implementation Plans for ozone and regional haze models and to the appropriate Federal Land Managers so they can make the proper determinations and evaluations of the potential impacts to Class I and Class II areas.

**17. If seeking approval to not display the expiration date for OMB approval of the**

*information collection, explain the reasons that display would be inappropriate.*

BOEM will display the OMB control number and approved expiration date.

***18. Explain each exception to the topics of the certification statement identified in, "Certification for Paperwork Reduction Act Submission."***

There are no exceptions to the certification statement.