SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal), EPA ICR Number 2437.03, OMB Control Number 2060-0673.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR Part 60, Subpart OOOO were proposed on August 23, 2011 (76 FR 52737), promulgated on August 16, 2012 (77 FR 49489), and recently amended on September 23, 2013 (78 FR 58415) and December 31, 2014 (79 FR 79017). The amendments provided clarification on notification and compliance dates and key definitions and addressed technical errors inadvertently included in the final rule; they did not modify rule reporting and recordkeeping requirements.

The regulations published at 40 CFR Part 60, Subpart OOOO apply to oil and natural gas facilities that commence construction, modification or reconstruction after August 23, 2011, and that are involved in the extraction and production of oil and natural gas, as well as the processing, transmission, and distribution of natural gas. The rule also incorporates the requirements of 40 CFR Part 60, Subparts KKK and LLL, which were added to reflect the eight year review EPA conducted on its oil and natural gas production and natural gas transmission and storage standards under section 111(b)(1)(B). Subparts KKK and LLL apply to onshore natural gas processing plants constructed, reconstructed, or modified after January 20, 1984 and on or before August 23, 2011. This information is being collected to assure compliance with 40 CFR Part 60, Subpart OOOO.

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 all calculations and compliance determinations. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities 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 five years following the date of such measurements, maintenance reports, and records. All reports are sent to the appropriate EPA regional office and to the delegated state or local authority, with the exception of the advance well completion notifications. For advance well completion notifications, if you are subject to state regulations that require advance notification of well completions and you have met those notification requirements, then you do not have to submit the advance well completion notification to the

EPA regional office. In the event that there is no such delegated authority, the reports are sent only to the United States Environmental Protection Agency (EPA) regional office.

The term "Affected Public" applies to oil and natural gas production, natural gas transmission, and natural gas distribution facilities, and may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal). None of the facilities are owned by state, local, tribal, or the Federal government. All are owned and operated by privately-owned, for-profit businesses. The burden to the "Federal Government" burden is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal).

Over the next three years, approximately 564 respondents per year will be subject to the standard, and 32 additional respondents per year will become subject to the standard. The 564 existing sources comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants, and 12 sweetening units. The 32 new sources comprise 29 processing plants and 3 sweetening units. These estimates are derived from Agency information gathered during rule development. During the renewal of this ICR, EPA also reviewed the Green House Gas Reporting Program (GHGRP) inventory, for which there is significant overlap with sources subject to this ICR. In comparing GHGRP data for the industry sectors relevant to this ICR, EPA found good overall agreement with the number of subject sources estimated for this ICR.

The Office of Management and Budget (OMB) approved the currently active 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/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, VOC and sulfur dioxide emissions from oil and natural gas production, natural gas transmission, and natural gas distribution facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart OOOO.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensures 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.

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 pollution control devices are properly installed and operated and that the standard is being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart OOOO.

3(a) Nonduplication

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 (79 FR 30117) on May 27, 2014. 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 Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO is EPA's database for the collection, maintenance, and retrieval of all compliance data.

Industry trade associations and other interested parties were provided with an opportunity to comment on the burden associated with the standard when it was being developed and further amended, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. For the current renewal, EPA contacted both the Independent Petroleum Association of America (IPAA) at (202) 857-4722 and America's Natural Gas Alliance (ANGA)/American Exploration and Production Council at (202) 789-2642.

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 (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 or modified oil and natural gas facilities. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for respondents affected by the standard are listed in the following table.

Standard (40 CFR Part 60, Subpart OOOO)	SIC Codes	NAICS Codes
Crude Petroleum and Natural Gas Extraction	1311	211111
Natural Gas Liquid Extraction	1321	211112
Natural Gas Distribution	4923, 4924, 4925, 4931, 4932, 4939	221210
Pipeline Distribution of Crude Oil	4612	486110
Pipeline Transportation of Natural Gas	4922, 4923	486210

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO).

A source must make the following notifications and reports:

Notifications and Reporting	
Notification of date of construction or reconstruction (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	60.7(a)(1)
Notification of date of actual startup (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	60.7(a)(3)
Notification of physical or operation change (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	60.7(a)(4)
General notification and reporting requirements (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	60.19
Initial notifications (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	60.5420(a)(1)
Notify the Administrator at least two days prior to a well completion operation.	60.5410(a); 60.5420(a)(2)
Annual report	60.5420(b)
Semiannual report for onshore natural gas processing plants	60.5422(b-c)
Notification of initial performance test.	60.8(d)
Annual reports including those of excess emissions.	60.5417(c); 60.487a(c)(2)(i)-(vi)
Performance test results.	60.8(a), 60.5420(b)(7), 60.5420(b)(8), 60.487a(e)
Annual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms at onshore natural gas processing plants	60.5423(b)

A source must keep the following records:

Recordkeeping	
For each gas well, maintain records identifying each well completion operation.	60.5420(b)(2); (c)(1)(i)
For each gas well, maintain records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with 60.5375.	60.5420(b)(2); (c)(1)(ii)
For each gas well, maintain records from each completion operation, including the location of the well; the American Petroleum Institute (API) well number; the date and time of the onset of flowback following hydraulic fracturing or refracturing; the date and time of	60.5420(b)(2); (c)(1)(iii)

Recordkeeping	
each attempt to direct flowback to a separator; the date and time of each occurrence of returning to the initial flowback stage; and the date and time that the well was shut in and the flowback equipment was permanently disconnected, or the startup of production; the duration of flowback; duration of recovery to the flow line; duration of combustion; duration of venting; and specific reasons for venting in lieu of capture or combustion.	
For each gas well, maintain a record of an exception claim under 60.5375(a)(3), including the location of the well; the API well number; the specific exception claimed; the starting and ending dates for the period the well operated under the exception; and an explanation of why the well meets the claimed exception.	60.5420(b)(2); (c)(1)(iv)
For each gas well, maintain a record of the digital photograph, if applicable.	60.5420(b)(2); (c)(1)(v)
For each centrifugal compressor, maintain records of identification of each centrifugal compressor which became affected during the reporting period, deviations in cases where the centrifugal compressor was not operated in compliance.	60.5420(b)(3); (c)(2)
For each reciprocating compressor, maintain records of cumulative number of hours of operation or number of months since initial startup, record of the time and date of rod packing replacement, records of deviations in cases where the reciprocating compressor was not operated in compliance.	60.5420(b)(4); (c)(3)
For each pneumatic controller, maintain records for, identification (date, location and manufacturer) of each pneumatic controller which became affected during the reporting period, device location, manufacturer specifications, records of reasons why pneumatic controllers with a bleed rate of greater than 6 scf/hr are required.	60.5420(b)(5); (c)(4)
Maintain records of storage vessel emissions and reductions. Records related to storage vessel inspections including results of inspection.	60.5420(b)(6); (c)(5)
Records of each closed vent system inspection required for centrifugal compressors or storage vessels.	60.5420(c)(6)
Records of each cover inspection required for centrifugal or reciprocating compressors or storage vessels.	60.5420(c)(7)
Records of each inspection, key checkout, or alarm sounding required for centrifugal or reciprocating compressors.	60.5420(c)(8)
Records of closed vent system monitoring required for centrifugal or reciprocating compressors.	60.5420(c)(9)
Records of carbon replacement schedule required for centrifugal compressors.	60.5420(c)(10)
Records of minimum and maximum operating parameter values, continuous parameter monitoring system data, calculated averages of	60.5420(c)(11)

Recordkeeping	
continuous parameter monitoring system data, results of all compliance calculations, and results of all inspections for each centrifugal compressor.	
Records of carbon replacement required for storage vessels.	60.5420(c)(12)
Records of inspections, manufacturers' operating instructions, procedures and maintenance schedule, and EPA Method 22 test results for storage vessels.	60.5420(c)(13)
Records of calculations and measurements required for sweetening units, including records retention two years for onshore natural gas processing plants.	60.5423(a)
Record of analysis demonstrating the source's design capacity is below applicable limits, including retention for the life of the facility for onshore natural gas processing plants.	60.5423(c-d)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems for onshore natural gas processing plants.	60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect for onshore natural gas processing plants.	60.482-10a(l)(1), (2)
Keep records related to pressure relief valves; number of pressure relief valves for onshore natural gas processing plants.	60.5421(b); 60.5422(a)-(c)
Keep records of inspections of closed vent systems during which no leaks are detected for onshore natural gas processing plants.	60.632(a); 60.482-10a(l)(4), (5)
Perform attachment of identification numbers to leaking equipment for onshore natural gas processing plants.	60.5416(b)(1)
Keep records of leak detection and repair for onshore natural gas processing plants.	60.5416(b)(2)
Keep records of design requirements for and operation of closed vent systems and control devices for onshore natural gas processing plants.	60.486(d)
Keep records listing equipment for onshore natural gas processing plants.	60.486a(e)
Keep records of compliance tests for onshore natural gas processing plants..	60.486a(e)(4)
Keep records of valves designated as unsafe or difficult to monitor for onshore natural gas processing plants.	60.486a(f); 60.5417(b)
Keep records of design criterion that indicate failure for onshore natural gas processing plants. .	60.486a(h)
Keep records of parts not in VOC service or otherwise exempt for onshore natural gas processing plants.	60.486(j)

Electronic Reporting

Data and records maintained by the respondents are tabulated and published for use in

compliance and enforcement programs of the Administrator. Information contained in the reports will be required to submit records electronically to EPA's Central DATA Exchange (CDX) using the Electronic Reporting Tool. CDX enables fast, efficient and more accurate environmental data submissions from state and local governments, industry and tribes to the EPA and participating program offices. EPA's CDX is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data submissions to the Agency. CDX works with both EPA program offices looking for a way to better manage incoming data, and stakeholders looking for a way to reduce burden from reporting requirements.

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Gather relevant information.
Perform initial performance 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.
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.
Transmit, or otherwise disclose the information.

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 required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in Integrated Compliance Information System (ICIS) and ECHO.

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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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

During the development of this standard, EPA performed a screening analysis for impacts on a sample of expected affected small entities by comparing compliance costs to entity revenues. The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. EPA nonetheless has tried to reduce the impact of this rule on small entities by the selection of highly cost-effective controls and specifying monitoring requirements that are the minimum to insure compliance. 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 Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (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. Where 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 93,900 (Total Labor Hours from Table 1). 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 $129.93 ($61.87 + 110%)

Technical	$103.97 ($49.51 + 110%)
Clerical	$51.79 ($24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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 is 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 (O&M) 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	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent[1]	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
SO_2 CEMS (control outlet)	$73,000	3	$219,000	$17,100	15	$256,500
Continuous control device monitoring for centrifugal compressors [2]	N/A	13	$0	$804	65	$52,260
Continuous control device monitoring for storage vessels [2]	N/A	304	$0	$804	1,520	$1,222,080
Total (rounded) [3]			$219,000			$1,530,000

[1] Annual O&M costs for centrifugal compressors and storage vessels were calculated assuming 2 hours per month at $33.51 per hour.

[2] Capital/Startup costs for continuous control device monitoring were included in storage vessel and centrifugal compressor control device costs.

[3] Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $219,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $1,530,000. 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 $1,750,000. These are recordkeeping 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 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 $476,000.

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

Managerial	$62.90 (GS-13, Step 5, $39.31 + 60%)
Technical	$46.67 (GS-12, Step 1, $29.17 + 60%)
Clerical	$25.25 (GS-6, Step 3, $15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (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 564 existing respondents will be subject to the standard. The 564 existing sources comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants, and 12 sweetening units. It is estimated that an additional 32 respondents per year will become subject and will comprise 29 processing plants and 3 sweetening units. The overall average number of respondents, as shown in the table below, is 596 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	32	532	0	0	564
2	32	564	0	0	596
3	32	596	0	0	628
Average	32	564	0	0	596

[1] New respondents include sources with constructed, reconstructed, and modified affected facilities. In this ICR, existing respondents also submit initial notifications for new affected facilities at existing respondent sites.

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 596.

It is important to note that some annual responses and associated burdens in this ICR are specific to the number of affected units at respondents' sites. Where appropriate, EPA has determined burdens based on the number of units associated with existing and new respondents. The following table summarizes the values used by EPA to estimate the burden presented in this ICR. These values are derived from Agency information gathered during rule development. EPA also reviewed the Green House Gas Reporting Program (GHGRP), for which there is significant overlap with sources subject to this ICR. In comparing GHGRP data for the industry sectors relevant to this ICR, EPA found good overall agreement with the number of subject sources estimated for this ICR.

Affected Units at Respondent Sites			
(A) Affected Unit	(B) Affected Sources	(C) Number of Existing Units at Affected Sources	(D) Number of New Units at Affected Sources
Centrifugal compressors	Processing plants	52	13
Reciprocating compressors	Gathering & boosting stations	840	210
	Processing plants	836	209

Affected Units at Respondent Sites			
(A) Affected Unit	(B) Affected Sources	(C) Number of Existing Units at Affected Sources	(D) Number of New Units at Affected Sources
Pneumatic controllers	Exploration & production sites	13,632	0
	Processing plants	60	15
Storage vessels	Production, processing, transmission, or storage	1,216	304
Total		16,636	751

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[1]	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notifications				
Gas well completion	300	33	0	9,900
Gas well recompletion	300	4	0	1,200
New gas processing plant	29	1	0	29
New sweetening unit	3	1	0	3
Annual reports				
Gas well completion/recompletion	300	1	0	300
Centrifugal compressor	65	1	0	65
Reciprocating compressor	2,095	1	0	2,095
Sweetening unit	15	1	0	15
Production pneumatic controller	300	1	0	300
Gas processing pneumatic controller	75	1	0	75
Storage vessel	380	1	0	380
Semiannual reports				
Gas processing plant	145	2	0	290
			Total	14,652

[1] Column B is based on either the number of respondents or the number of affected units, as appropriate for the given information collection activity. The number of respondents and affected units are provided above.

The number of Total Annual Responses is 14,652.

The total annual labor costs are $9,450,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (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 93,900. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 6 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $1,750,000. 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 the next three years is estimated to be 10,400 labor hours at a cost of $476,000. See Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

6(f) Reasons for Change in Burden

There is an increase in the total estimated respondent burden and total annual O&M as

currently identified in the OMB Inventory of Approved Burdens. This burden increase is due to adjustments EPA has made to account for industry growth that has occurred since the ICR was last approved. EPA has also updated corresponding labor costs to reflect current rates referenced from the Bureau of Labor Statistics. EPA has similarly adjusted the Agency labor burden to reflect industry growth over the past three years and has updated labor costs to reflect rates referenced from the Office of Personnel Management.

EPA has also revised the respondent burden associated with compressor notifications and storage vessel annual reports. The previous ICR assumed respondents would submit initial notifications for affected centrifugal and reciprocating compressors. These sources, however, are not subject to initial notification requirements, thus we have removed them from the burden calculations. For storage vessels, the previous ICR assumed respondents would complete an individual report for each affected storage vessel. The rule, however, allows respondents to submit a single report for all affected storage vessels at their site. EPA's experience has been that respondents typically consolidate reporting activities in order to reduce the overall reporting burden. For this reason, we have revised the burden calculations to assume each respondent will submit a single report.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 6 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-2014-0102. 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) 566-1927. 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-2014-0102 and OMB Control Number 2060-0673 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 Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal)

	A	B	C	D	E	F	G	H
Burden item	**Person-hours per occurrence**	**Annual occurrences per respondent**	**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)**	**Annual cost ($) [b]**
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Report requirements	N/A							
a. Familiarization with the rule requirements [c]	1	1	1	596	596	29.8	59.6	68,924.72
b. Required activities								
i. Notification of gas well completion [d]	0.5	33	17	300	4,950	247.5	495	572,445.23
ii. Notification of gas well recompletion [d]	0.5	4	2	300	600	30	60	69,387.3
iii. Notification of new gas processing plant [e]	1	1	1	29	29	1.45	2.9	3,353.72
iv. Notification of new sweetening unit [f]	1	1	1	3	3	0.15	0.3	346.94
c. Create information	See 4B							
d. Gather existing information	See 4E							
e. Annual reports								
i. Gas well completion/ recompletion [d]	16	1	16	300	4,800	240	480	555,098.4
ii. Sweetening unit [f]	1	1	1	15	15	0.75	1.5	1,734.68
iii. Centrifugal compressor [g]	8	1	8	65	520	26	52	60,135.66
iv. Reciprocating compressor [h]	8	1	8	2,095	16,760	838	1,676	1,938,218.58
v. Production pneumatic controller [i]	8	1	8	300	2,400	120	240	277,549.2
vi. Gas processing pneumatic	8	1	8	75	600	30	60	69,387.3

Burden item	A Person-hours per occurrence	B Annual occurrences per respondent	C Person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Annual cost ($) [b]
controller [j]								
vii. Storage vessel [k]	8	1	8	380	3,040	152	304	351,562.32
f. Semiannual reports								
i. Gas processing plant [l]	40	2	80	145	11,600	580	1,160	1,341,487.8
Reporting Subtotal						***52,799***		***5,309,632***
5. Recordkeeping requirements								
a. Read instructions	See 4A							
b. Plan activities	See 4B							
c. Implement activities								
i. Filing and maintaining records [l]	5	12	60	436	26,160	1,308	2,616	3,025,286.28
ii. Filing and maintaining records [m]	5	12	60	160	9,600	480	960	1,110,196.8
d. Record data	N/A							
e. Time to transmit or disclose information								
i. Records required by standards	See 5C							
f. Time to train personnel	See 5C							
g. Time for audits	N/A							
Recordkeeping Subtotal						***41,124***		***4,135,483***
TOTAL ANNUAL BURDEN AND COST (ROUNDED)						**93,900**		**9,450,000**
TOTAL ANNUAL CAPITAL AND O&M COST (SEE SECTION 6(b)(iii))								**1,750,000**
GRAND TOTAL (LABOR, CAPITAL, AND O&M)								**11,200,000**

N/A - Not Applicable

Note: Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

Assumptions:

[a] EPA estimates an average of 564 existing sources and 32 new sources will be subject to the standard over the next three years. Existing sources comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants and 12 sweetening units. New sources comprise 29 processing plants and 3 sweetening units.

[b] This ICR uses the following labor rates: $103.97 (technical), $129.93 (managerial), and $51.79 (clerical). These rates are from the United States Department of

Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] This burden represents the time existing respondents spend re-familiarizing themselves with rule requirements, or that new respondents spend learning rule requirements.

[d] Assumes 9,759 completions and 1,206 recompletions each year performed by 300 operators.

e EPA estimates an average of 116 existing and 29 new processing plants.

f EPA estimates an average of 12 existing and 3 new sweetening units.

g EPA estimates an average of 52 existing and 13 new centrifugal compressors equipped with wet seals at processing plants.

h EPA estimates an average of 1,676 existing and 419 new reciprocating compressors. For existing sources, EPA estimates there are 840 compressors at gathering & boosting stations and 836 compressors are at processing plants. For new sources, EPA estimates there will be 210 compressors at gathering & boosting stations and 209 compressors at processing plants.

[i] EPA estimates 13,632 pneumatic controllers across the 300 exploration & production sites.

[j] EPA estimates an average of 60 existing and 15 new pneumatic controllers at affected processing plants.

[k] EPA estimates an average of 304 existing and 76 new respondents in the production, processing, transmission, or storage segment will submit annual reports. EPA anticipates each report will cover approximately four storage vessels, based on research the Agency conducted during initial rule development.

[l] Activity applies to exploration & production businesses and transmission & storage operations, for which EPA estimates an average of 300 and 136 sources, respectively.

[m] Activity applies to gas processing plants and sweetening units. EPA estimates an average of 116 existing and 29 new processing plants and 12 existing and 3 new units.

Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal)

	A	B	C	D	E	F	G	H
Burden item	**EPA person-hours per occurrence**	**Annual occurrences per respondent**	**EPA 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)**	**Annual cost ($) [b]**
Review initial notifications								
i. Notification of gas well completion	0.5	33	17	300	4,950	247.5	495	259,083
ii. Notification of gas well recompletion	0.5	4	2	300	600	30	60	31,404
iii. Notification of new gas processing plant	0.5	1	1	29	14.5	0.73	1.45	759.24
iv. Notification of new sweetening unit	0.5	1	1	3	1.5	0.08	0.15	78.82
Review annual reports								
i. Gas well completion/recompletion	1	1	1	300	300	15	30	15,702
ii. Sweetening unit	1	1	1	15	15	0.75	1.5	785.1
iii. Centrifugal compressor	1	1	1	65	65	3.25	6.5	3,402.1
iv. Reciprocating compressor	1	1	1	2,095	2,095	104.75	209.5	109,652.3
v. Production pneumatic controller	1	1	1	300	300	15	30	15,702
vi. Gas processing pneumatic controller	1	1	1	75	75	3.75	7.5	3,925.5
vii. Storage vessel	1	1	1	380	380	19	38	19,889.2
Review semiannual reports								
i. Gas processing plant	1	2	2	145	290	14.5	29	15,178.6
TOTAL ANNUAL BURDEN AND COST (ROUNDED)					**10,400**			**476,000**

Note: Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

Assumptions:

[a] EPA estimates an average of 564 existing sources and 32 new sources will be subject to the standard over the next three years. Existing sources comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants and 12 sweetening units. New sources comprise 29 processing plants and 3 sweetening units.

[b] This ICR uses the following labor rates: $46.67 (technical), $62.90 (managerial), and $25.25 (clerical). These rates are from the Office of Personnel Management (OPM), 2014 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.