

Appendix A-1
LABOR RATES

Contractor Rates [1]

2016 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits, Overhead & Profit</i>	<i>Total</i>
\$96.00	\$43.43	2.2	\$95.55

Respondent Rates [2]

2016 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits & Overhead</i>	<i>Total</i>
\$87.00	\$43.43	2	\$86.87

State/Local Agency Rates [3]

2016 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits & Overhead</i>	<i>Total</i>
\$63.00	\$31.65	2	\$63.30

EPA Rates [4]

2016 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits</i>	<i>Total</i>
\$54.00	\$33.72	1.6	\$53.95

[1] Industry contractor rate based on mean hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2015; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in October 2016) Benefits and overhead assumed to total 100% of wages; profit margin assumed to be 10% on top of "loaded" total. See wage escalation calculations below.

[2] Respondent in-house rate based on mean hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2015; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in October 2016) Benefits and overhead assumed to total 100% of wages. See wage escalation calculations below.

[3] State/Local rates based on 25th percentile hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2015; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in October 2016) Benefits and overhead assumed to total 100% of wages. See wage escalation calculations below.

[4] Federal Labor Cost obtained from U.S. Office of Personnel Management 2016 General Schedule

Universe of Respondents

Universe Estimates

Sources under EPA authority

# New exploration sources	4	see below - 4 represents the number of expected primary permits to be issued during ICR period
# Existing exploration sources	4	see below - 4 represents the number of existing permits at the start of the ICR period
# Exploration wells to be drilled	2	see below - only 2 exploratory well are likely to be drilled during ICR period
# New development/production sources	0	
# Existing sources	0	this refers to existing development/production sources
# New alternative energy sources	3	3 minor source permits
# Existing alternative energy sources	1	Cape Wind project which has been permitted (NA NSR major source) but not yet built
<i>Sources under state/local authority</i>		
# New exploration sources	0	
# New development/production sources	0	
# Existing sources	23	include two sources making minor permit mods
# Construction mod to existing sources	2	the two minor mods above require minor NSR permits as well
# New alternative energy sources	2	2 minor source permits
# Existing alternative energy sources	0	
Total Number of Sources	37	does not include # exploration wells (row 8) or modified existing sources (row 18) as this would be double counting
State/local agencies overseeing sources	5	see below
Total Number of Respondents	42	

New and existing exploration sources under EPA authority - 2017 renewal

Alaska

None.

Eastern Gulf

2 existing exploratory permits currently in effect; held by the same permittee.

3 major source exploratory permits currently in house at Region 4. Two are virtually complete - consider these as permitted sources. One still requires additional processing - consider it as a new source to be permitted.

3 new major source exploratory permits projected for the ICR period.

2 exploratory wells will actually be drilled during the ICR period, across all the permits above. The testing, monitoring, recordkeeping and reporting requirements of the permits only apply during the period when they are actually drilling.

New and existing alternative energy sources

Under EPA authority

1 existing permit, for the Cape Wind project, which has not yet been constructed. **Assume that it will be constructed during this ICR period.**

Leases have been issued in MA (2 leases) and MA/RI (1 lease), with further action from lessees related to the Site Assessment Plans (SAPs). **Assume that 3 minor source permits will be issued, each to install a meteorological tower or buoy; no operating permit required (below title V thresholds).**

Leases have been issued off other states, but does not appear that permitting will occur during the ICR period.

Under state/local authority

Maryland Dept. of Environment has 1 application in house; a Virginia lessee has submitted a SAP. **Assume that 2 minor source permits will be issued, each to install a meteorological tower or buoy; no operating permit required (below title V thresholds).**

Leases have been issued off other delegated states, but does not appear that permitting will occur during the ICR period.

State and local agencies projected to have authority over sources

- Santa Barbara County Air Pollution Control District
- South Coast Air Quality Management District
- Ventura County Air Pollution Control District
- Maryland Department of Environment
- Virginia Department of Environmental Quality

**EXHIBIT 1. NEW AND PREVIOUSLY PERMITTED EXPLORATION SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Read regulations ²	4	1	1.33	5	\$435.00	0	\$0.00	7	\$580.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA ²	4	1	1.33	5	\$435.00	0	\$0.00	7	\$580.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	4	1	1.33	30	\$2,610.00	0	\$0.00	40	\$3,480.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	4	1	1.33	50	\$4,350.00	293	\$28,128.00	457	\$43,304.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	0	1	0.00	25	\$2,175.00	146	\$14,016.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test ⁴	2	1	0.67	100	\$8,700.00	764	\$73,344.00	576	\$54,696.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁵	4	1	1.33	42	\$3,654.00	0	\$0.00	56	\$4,872.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ^{4, 6}	2	1	0.67	32	\$2,784.00	0	\$0.00	21	\$1,856.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	8.00				Burden	1,164	\$109,368.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications

**EXHIBIT 2. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Read regulations ²	3	1	1.00	5	\$435.00	0	\$0.00	5	\$435.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA ²	3	1	1.00	5	\$435.00	0	\$0.00	5	\$435.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	3	1	1.00	30	\$2,610.00	0	\$0.00	30	\$2,610.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	0	1	0.00	50	\$4,350.00	293	\$28,128.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	3	1	1.00	25	\$2,175.00	146	\$14,016.00	171	\$16,191.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁴	0	1	0.00	42	\$3,654.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁵	4	3	4.00	32	\$2,784.00	0	\$0.00	128	\$11,136.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	8.00				Burden	339	\$30,807.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications
2. Assumes all new permittees must perform these tasks
3. Assumes all new permits are minor source permits at this time because they are all in the Site Assessment phase (i.e., only placing a tower or buoy to take meteorological readings).
4. Assumes that all new major source permittees also incorporate operating permit requirements at the same time; for the 2016 ICR renewal we project 0 new major sources
5. Assumes that all new and existing permittees must conduct recordkeeping and reporting during each year of the ICR period

**EXHIBIT 3. NEW DEVELOPMENT/PRODUCTION SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence ²	Capital Costs per Occurrence ³	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Read regulations	0	1	0.00	5	\$435.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA	0	1	0.00	5	\$435.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct	0	1	0.00	30	\$2,610.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare preconstruction permit application	0	1	0.00	100	\$8,700.00	585	\$56,160.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test	0	1	0.00	100	\$8,700.00	764	\$73,344.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application	0	1	0.00	42	\$3,654.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁴	0	3	0.00	64	\$5,568.00	0	\$0.00	0	\$0.00	\$1,339.83	\$26,796.53	\$0.00	\$0.00
		Responses per Year**	0.00				Burden	0	\$0.00	\$1,339.83	\$26,796.53	\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR

2. Assumes O&M is 5 percent of capital costs

3. Capital costs calculated using the July 2016 (preliminary) CEPCI index for process instruments (389.3) compared to the final December 1998 index (363.2) and applied to the 1998 estimate of \$25,000

4. Assumes that all permittees must conduct recordkeeping and reporting during each year of the ICR period

**This number is used in the summary (Exhibit 14)

**EXHIBIT 4. NEW EXPLORATION SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Read regulations	0	1	0.00	5	\$435.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA, or State and local agency	0	1	0.00	5	\$435.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct and permit application	0	1	0.00	70	\$6,090.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test	0	1	0.00	100	\$8,700.00	748	\$71,808.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to local agency	0	3	0.00	64	\$5,568.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	0.00				Burden	0	\$0.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR

**EXHIBIT 5. NEW ALTERNATIVE ENERGY SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Read regulations ²	2	1	0.67	5	\$ 435.00	0	\$0.00	3	\$290.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with state/local agency ²	2	1	0.67	5	\$ 435.00	0	\$0.00	3	\$290.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	2	1	0.67	30	\$ 2,610.00	0	\$0.00	20	\$1,740.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	0	1	0.00	50	\$ 4,350.00	293	\$28,128.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	2	1	0.67	25	\$ 2,175.00	146	\$14,016.00	114	\$10,794.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁴	0	1	0.00	42	\$ 3,654.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to state/local agency ⁵	2	3	2.00	32	\$ 2,784.00	0	\$0.00	64	\$5,568.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	4.67				Burden	205	\$18,682.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications
2. Assumes all new permittees must perform these tasks
3. Assumes all new permits are minor source permits at this time because they are all in the Site Assessment phase (i.e., only placing a tower or buoy to take meteorological readings)
4. Assumes that all new major source permittees also incorporate operating permit requirements at the same time; for the 2016 ICR renewal we project 0 new major sources
5. Assumes that all new and existing permittees must conduct recordkeeping and reporting during each year of the ICR period

**This number is used in the summary (Exhibit 14)

**EXHIBIT 6. EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence ²	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$87.00		\$96.00						
Prepare permit to operate application ³	15	1	5.00	42	\$3,654.00	0	\$0.00	210	\$18,270.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform annual compliance test	23	3	23.00	100	\$8,700.00	764	\$73,344.00	19,872	\$1,887,012.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁴	23	3	23.00	64	\$1,131.00	0	\$0.00	1,472	\$26,013.00	\$1,339.83	\$0.00	\$30,816.01	\$0.00
Prepare a NOI to construct ⁵	2	1	0.67	30	\$2,610.00	0	\$0.00	20	\$1,740.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor modification permit application ⁵	2	1	0.67	50	\$4,350.00	293	\$28,128.00	229	\$21,652.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major modification permit application	0	1	0.00	100	\$8,700.00	585	\$56,160.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	52.33				Burden	21,803	\$1,954,687.00	\$1,339.83	\$0.00	\$30,816.01	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except that hours for minor preconstruction permit are half the major source level
2. O&M costs equal those calculated in Exhibit 3
3. Assumes 5 of the 23 sources will apply to renew their title V permits to operate each year. These are 5-year permits, so this is a conservatively high yearly average.

**EXHIBIT 7. NEW EXPLORATION SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$63.00		
Consult with sources	0	1	0.00	5	\$315.00	0	\$0.00
Review NOI to construct	0	1	0.00	55	\$3,465.00	0	\$0.00
Review permit to operate application	0	1	0.00	40	\$2,520.00	0	\$0.00
Oversee initial compliance test	0	1	0.00	67	\$4,221.00	0	\$0.00
Conduct inspections	0	2	0.00	16	\$1,008.00	0	\$0.00
Review data reports	0	1	0.00	8	\$504.00	0	\$0.00
		Responses per year**	0.00		Burden	0	\$0.00

* Assumes hours per occurrence is the same as that in the 1998 ICR.

**EXHIBIT 8. NEW ALTERNATIVE ENERGY SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$63.00		
Consult with sources ²	2	1	0.67	5	\$315.00	3	\$210.00
Review NOI to construct and minor source permit application ³	2	1	0.67	55	\$3,465.00	37	\$2,310.00
Review NOI to construct and major source permit application ³	0	1	0.00	263	\$16,569.00	0	\$0.00
Review permit to operate application ⁴	0	1	0.00	40	\$2,520.00	0	\$0.00
Conduct inspections ⁵	2	3	2.00	16	\$1,008.00	32	\$2,016.00
Review data reports ⁵	2	3	2.00	8	\$504.00	16	\$1,008.00
		Responses per year**	5.33		Burden	88	\$5,544.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR for consultations, inspections and report reviews; hours for permit app

**EXHIBIT 9. EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$63.00		
Oversee annual compliance test	23	3	23.00	67	\$4,221.00	1,541	\$97,083.00
Conduct inspections	23	12	92.00	16	\$1,008.00	1,472	\$92,736.00
Review permit to operate application ²	15	1	5.00	40	\$2,520.00	200	\$12,600.00
Review data reports	23	3	23.00	8	\$504.00	184	\$11,592.00
Review NOI to construct and permit application ³	2	1	0.67	35	\$2,205.00	23	\$1,470.00
		Responses per year**	143.67		Burden	3,420	\$215,481.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR.
2. Assumes 5 of the 23 sources will apply to renew their title V permits to operate each year. These are 5-year permits, so this is a conservatively high yearly average.
3. Assumes 2 of the existing sources will undergo minor NSR preconstruction permitting for changes at their facilities.

**This number is used in the summary (Exhibit 14)

**EXHIBIT 10. NEW AND PREVIOUSLY PERMITTED EXPLORATION SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$54.00		
Consult with sources ²	4	1	1.33	5	\$270.00	7	\$360.00
Review NOI to construct and minor permit application ³	0	1	0.00	35	\$1,890.00	0	\$0.00
Review NOI to construct and major permit application ³	4	1	1.33	263	\$14,202.00	351	\$18,936.00
Review operating permit application ⁴	4	1	1.33	40	\$2,160.00	53	\$2,880.00
Oversee initial compliance test ⁵	2	1	0.67	67	\$3,618.00	45	\$2,412.00
Review data reports ^{5, 6}	2	1	0.67	8	\$432.00	5	\$288.00
					Burden	461	\$24,876.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR

**EXHIBIT 11. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$54.00		
Consult with sources ²	3	1	1.00	5	\$270.00	5	\$270.00
Review NOI to construct and minor source permit application ³	3	1	1.00	35	\$1,890.00	35	\$1,890.00
Review NOI to construct and major source permit application ³	0	1	0.00	263	\$14,202.00	0	\$0.00
Review operating permit application ⁴	0	1	0.00	40	\$10,800.00	0	\$0.00
Review data reports ⁵	4	3	4.00	8	\$432.00	32	\$1,728.00
					Burden	72	\$3,888.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except burden for review of a minor source revised to be consistent with other e

**EXHIBIT 12. NEW and EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Costs per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$54.00		
Consult with sources	0	1	0.00	5	\$270.00	0	\$0.00
Review NOI to construct and permit application	0	1	0.00	263	\$14,202.00	0	\$0.00
Review preconstruction permit application	0	1	0.00	100	\$5,400.00	0	\$0.00
Oversee initial compliance test	0	1	0.00	67	\$3,618.00	0	\$0.00
Review operating permit application	0	1	0.00	40	\$10,800.00	0	\$0.00
Review data reports	0	1	0.00	8	\$702.00	0	\$0.00
					Burden	0	\$0.00

* Assumes hours per occurrence is the same as that in the 1998 ICR.

**EXHIBIT 13. CONSISTENCY UPDATES AND OVERSEEING STATE/LOCAL ACTIVITIES
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$54.00		
Annual Consistency Reviews	16	3	16.00	4	216.00	64	\$3,456.00
Major NOI/Regulatory Changes Review	2	1	0.67	150	8,100.00	100	\$5,400.00
Minor NOI/Regulatory Changes Review	4	1	1.33	40	2,160.00	53	\$2,880.00
					Burden	217	\$11,736.00

* Assumes hours per occurrence is the same as that in the 1998 ICR, except we have added concept of "minor" review

**EXHIBIT 14. OCS AIR REGULATIONS INFORMATION COLLECTION BURDEN
SUMMARY OF ANNUAL BURDENS AND COSTS**

	Responses	Respondent Hours	Respondent Costs	O&M Costs	Capital Costs	Agency Hours	Agency Costs
New and Previously Permitted Exploration Sources under EPA Authority (Exhibit 1)	8.0	1,164	\$109,368	\$0	\$0		
New and Previously Permitted Alternative Energy Sources under EPA Authority (Exhibit 2)	8.0	339	\$30,807	\$0	\$0		
New Development / Production Sources under EPA Authority (Exhibit 3)	0.0	0	\$0	\$0	\$0		
New Exploration Sources under State/Local Authority (Exhibit 4)	0.0	0	\$0	\$0	\$0		
New Alternative Energy Sources under State/Local Authority (Exhibit 5)	4.7	205	\$18,682	\$0	\$0		
Existing Development / Production Sources under State/Local Authority (Exhibit 6)	52.3	21,803	\$1,954,687	\$30,816	\$0		
Subtotal of Industry Burden (rounded)	73.0	23,510	\$2,113,544	\$30,816	\$0		
New Exploration Sources under State/Local Authority (Exhibit 7)	0.0	0	\$0				
New Alternative Energy Sources under State/Local Authority (Exhibit 8)	5.3	88	\$5,544				
Existing Development/ Production Sources under State/Local Authority (Exhibit 9)	143.7	3,420	\$215,481				
Subtotal of State/Local Burden (rounded)	149.0	3,508	\$221,025				
New and Previously Permitted Exploration Sources under EPA Authority (Exhibit 10)						461	\$24,876
New and Previously Permitted Alternative Energy Sources under EPA Authority (Exhibit 11)						72	\$3,888
New and Existing Development/ Production Sources under EPA Authority (Exhibit 12)						0	\$0
Consistency Updates (Exhibit 13)						217	\$11,736
Subtotal of EPA Burden						750	\$40,500
Total Annual Cost /Burden for the Outer Continental Shelf Air Regulations	222	27,018	\$2,334,569	\$30,816	\$0	750	\$40,500