

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) (Renewal), EPA ICR Number 1789.10, OMB Control Number 2060-0418.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) were proposed on February 6, 1998, promulgated on June 17, 1999, and amended on August 16, 2012. These regulations apply to existing facilities and new facilities that are major sources of hazardous air pollutants (HAP) and that either transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company). The 2012 amendment eliminates the startup, shutdown and malfunction (SSM) exemption, establishes MACT standards for “small” glycol dehydration units (glycol dehydrators with an actual annual average natural gas flowrate less than 283,000 scmd or actual average benzene emissions less than 0.9 Mg/yr), and requires facilities using carbon adsorbers as a control device to keep records of their carbon replacement schedule. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is collected to assure compliance with 40 CFR Part 63, Subpart HHH.

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

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

There are approximately 55 natural gas transmission and storage facilities, all which are owned and operated by the natural gas industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all privately-owned, for-profit businesses. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Natural Gas

Transmission and Storage (40 CFR Part 63, Subpart HHH) (Renewal). The Federal Government's "burden" is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) (Renewal). We assume that they will all respond to EPA's inquiries.

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

Over the next three years, approximately 55 respondents per year will be subject to these standards, and 6 additional new respondents per year will become subject to these same standards.

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

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

In the Administrator's judgment, HAP emissions from natural gas transmission and storage facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart HHH.

2(b) Practical Utility/Users of the Data

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

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

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

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

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart HHH.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (82 FR 29552) on June 29, 2017. 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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. Based on this input, the agency retained a constant growth rate of 6 new respondents per year for the industry, which matches the growth rate in the previous ICR renewal. Considering this growth rate, approximately 55 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the American Gas Association (AGA), at (202) 824-7340, and the Interstate Natural Gas Association of America (INGAA), at (202) 216-5926. EPA received comments from INGAA stating that INGAA does not have a strong basis upon which to respond about the estimated range of the number of affected sources; therefore, EPA maintained the same industry growth rate cited in the previous ICR renewal.

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

3(d) Effects of Less-Frequent Collection

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

3(e) General Guidelines

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

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

years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

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

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards 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 natural gas transmission and storage facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below:

| Standard (40 CFR Part 63, Subpart HHH) | SIC Codes | NAICS Codes |
|---|------------------|--------------------|
| Pipeline Transportation of Natural Gas | 4922 | 48621 |
| Natural Gas Distribution | 4923 | 22121, 48621 |

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH).

A source must make the following reports:

| Notifications | |
|---|--|
| Initial notification that a source is subject to the provisions in subpart HHH. | 63.9(b)(2), 63.1274(a), 63.1285(b)(1-2) |
| Notification of the date of a performance test. | 63.7(b-c), 63.8(e)(2), 63.9(e), 63.9(g)(1), 63.1274(a), 63.1285(b)(3) |
| Notification of Compliance Status Report, including the results of any continuous monitoring system performance evaluations and inspection results. | 63.9(h), 63.1270(d), 63.1283(c)(2)(ii)(A), 63.1285(b)(4), 63.1274(a), 63.1285(d)(1-10) |
| Notification of change in compliance demonstration methods for control device performance (submit with Periodic Report). | 63.1282(e) |
| Performance test results for closed-vent systems using flares as the control device (submit with Notification of Compliance Status Report). | 63.7(g), 63.10(d)(2), 63.1274, 63.1282(d) (3), 63.1285(d)(2) |
| Design analysis documentation, including operating parameters and calculations, for closed-vent systems using control devices other than flares (submit with Notification of Compliance Status Report). | 63.1274, 63.1282(d) (4), 63.1285(d)(4)(i) through (d)(4)(iii) |
| One complete test report for each test method used for a particular source (submit with Notification of Compliance Status Report). | 63.1285(d)(3) |
| Analysis demonstrating whether an affected source is a major source (submit with Notification of Compliance Status Report). | 63.1285(d)(8) |
| Statement of compliance with subpart HHH (submit with Notification of Compliance Status Report). | 63.1285(d)(9) |
| Notification of any process change. | 63.1285(f) |
| Application for approval of construction or reconstruction. | 63.5(d)(1), 63.1274(a) |
| Notification of intent to construct or reconstruct. | 63.9(b)(5)(i), 63.9(d) (4)(i), 63.1274(a) |
| Notification of actual date of startup. | 63.9(b)(4)(v), 63.9(b) (5)(ii), 63.1274(a) |
| | |

| Notifications | |
|--|----------------------------------|
| Results of performance evaluation. | 63.8(e)(5), 63.10(e), 63.1274(a) |
| Notification of special compliance requirements. | 63.9(d), 63.1274(a) |

| Reports | |
|--|-------------------------------------|
| Semiannual Periodic Reports. | 63.10(e), 63.1274(a), 63.1285(e) |
| Report to demonstrate compliance with benzene emission limit (alternative standards) (submit with Notification of Compliance Status Report). | 63.1285(d)(7) |
| Analysis that demonstrates conditions under which the facility reduces 95.0 percent of its HAP emissions (submit with Notification of Compliance Status Report). | 63.1281(e)(2), 63.1285(d)(10) |
| Semiannual excess emissions and continuous monitoring system performance report. | 63.9(c)(8), 63.10(e)(3), 63.1274(a) |
| Semiannual HAP summary report. | 63.10(e)(3)(vi), 63.1274(a) |

A source must keep the following records:

| Recordkeeping | |
|--|--|
| Records for each monitoring system including documentation of incidents such as breakdowns, repairs, calibration checks, startup, shutdown, malfunctions, and other down time. | 63.10(b)(2), 63.10(c), 63.1272(d), 63.1274(a), 63.1283(d), 63.1284(b)(3) |
| Continuous records of equipment operating parameters and daily average values of the parameters. | 63.1284(b)(4)(i) and (ii) |
| Records of the times and duration of all periods during which pilot flames are absent. | 63.1284(b)(4)(ii), 63.1284(e)(3) |

| Recordkeeping | |
|--|--|
| Records of flow indicator operation, detection, and vent stream diversions. | 63.1284(b)(4)(iii) |
| Records of inspections of seals or closure mechanisms and records of broken or changed seals, valves, or locks. | 63.1284(b)(4)(iv) |
| Continuous monitoring system quality control program. | 63.8(d), 63.1274(a) |
| Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. | 63.1284(f) |
| Records of control device activities, malfunctions, and down time. | 63.1274, 63.1281(c)(3), 63.1283(d), 63.1284(b)(3) and (b)(4) |
| Records pertaining to the inspection of closed-vent systems including maintenance, leaks, repairs, delays, and shutdowns. This also applies to parts that are difficult or unsafe to inspect and those where a leak or defect is detected. | 63.1283(c)(3-7), 63.1284(b)(5-8) |
| Records of glycol dehydration unit baseline operations, throughput quantity, and emissions information. | 63.1281(e)(1-2), 63.1284(b)(9-10), 63.1284(d) |
| Records of compliance with benzene emission limit (alternative standards). | 63.1281(e)(2), 63.1284(c) |
| Throughput and emissions records of exempt glycol dehydration units. | 63.1274(c-d), 63.1284(d) |
| Records of flare design and emissions. | 63.1284(e) |
| Records of leak or defect detection, severity (maximum instrument reading), and date of repair. | 63.1284(b)(7-8) |
| Site-specific performance evaluation test plan. | 63.7(c)(2), 63.8(d)(2), 63.8(e)(3)(i), 63.1274(a) |
| Record of results of performance test. | 63.7(g)(3), 63.1274(a) |

Electronic Reporting

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

(ii) Respondent Activities

| Respondent Activities |
|---|
| Familiarization with the regulatory requirements. |
| Install, calibrate, maintain, and operate closed vent systems and CMS to: 1) achieve a 95% reduction in HAP, TOC, or total HAP, for control devices and vapor recovery devices; 2) achieve a reduction to 20 ppm of TOC or total HAP, and operates at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius for combustion devices. |
| Perform initial performance test, using the procedures listed in 40 CFR 63.1282(d), and repeat performance tests if necessary. |
| Write the notifications and reports listed above. |
| Enter information required to be recorded above. |
| Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information. |
| Train personnel to be able to respond to a collection of information. |
| Transmit, or otherwise disclose the information. |

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

5(a) Agency Activities

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

| Agency Activities |
|---|
| Observe initial performance tests and repeat performance tests if necessary. |
| Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry. |
| Audit facility records. |
| Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS. |

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 standards, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is 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 five years.

5(c) Small Entity Flexibility

There is a distribution of business sizes among the respondents. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The Agency estimates that 49 percent of the parent companies affected by proposed action are small entities as defined by the Small Business Administration.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Natural Gas Transmission and Storage (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 neither conduct nor 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 2,910 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

| | |
|------------|---------------------------|
| Managerial | \$144.33 (\$68.73+ 110%) |
| Technical | \$108.28 (\$51.56 + 110%) |
| Clerical | \$53.34 (\$25.40 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activities required by these subject standards are labor costs. There are no capital/startup or operation and maintenance costs incurred as a result of these standards because the industry has primarily installed flares to control emissions.

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

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

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$15,700.

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

| | |
|------------|--|
| Managerial | \$64.80 (GS-13, Step 5, \$40.50 + 60%) |
| Technical | \$48.08 (GS-12, Step 1, \$30.05 + 60%) |
| Clerical | \$26.02 (GS-6, Step 3, \$16.26 + 60%) |

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. These same 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 – (40 CFR Part 63, Subpart HHH) (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 49 existing respondents will be subject to these standards. It is estimated that an additional 6 respondents per year will become subject to these same standards. The new respondents are all estimated to be separate new sources instead of reconstructed sources. The overall average number of respondents, as shown in the table below, is 55 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 ² | (D) Number of Existing Respondents That Are Also New Respondents | (E) Number of Respondents (E=A+B+C-D) ³ |
| 1 | 6 | 43 | N/A | 0 | 49 |
| 2 | 6 | 49 | N/A | 0 | 55 |
| 3 | 6 | 55 | N/A | 0 | 61 |
| Average | 6 | 49 | N/A | 0 | 55 |

¹ New respondents include six new facilities that became subject to the rule for the first time.

² Column C does not apply as there are no existing respondents that are required to keep records only on an annual basis since major source determination is a one-time activity to determine rule applicability.

³ The previous (currently approved) ICR expires on 8/31/2018. Therefore, Year 1 of this ICR renewal corresponds to September 2018 through August 2019.

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 55.

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

| Total Annual Responses | | | | |
|---|------------------------------|----------------------------|---|--|
| (A) Information Collection Activity | (B) Number of Respondents | (C) Number of Responses | (D) Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E) Total Annual Responses E=(BxC)+D |
| (A) Information Collection Activity | (B) Number of Respondents | (C) Number of Responses | (D) Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E) Total Annual Responses E=(BxC)+D |
| Notification of intent to construct/reconstruct | 6 | 1 | N/A | 6 |
| Notification of actual date of startup | 6 | 1 | N/A | 6 |
| Notification of date of continuous monitoring system performance evaluation | 6 | 1 | N/A | 6 |
| Notification of planned date of performance test | 6 | 1 | N/A | 6 |
| Notification of compliance status report | 6 | 1 | N/A | 6 |
| Semiannual reports | 55 | 2 | N/A | 110 |
| | | | Total | 140 |

The number of Total Annual Responses is 140.

The total annual labor costs are \$306,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Natural Gas Transmission and Storage (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 2,910 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Natural Gas Transmission and Storage (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 21 hours per response.

There are no capital/startup or operation and maintenance costs for this particular ICR.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 336 labor hours at a cost of \$15,700; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transmission and Storage (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 burden hours and number of responses in this ICR compared to the previous ICR. This increase is not due to any program changes. The increase is due to an increase in the number of affected sources subject to the rule based on the latest available data and taking into account growth in this industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 21 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 neither conduct nor 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-2014-0059. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2014-0059 and OMB Control Number 2060-0418 in any correspondence.

Part B of the Supporting Statement

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

| | | | | | | | | |
|---|--------|---|----|----|--------------|------|-----|---------------------|
| A. Familiarize with regulatory requirements | See 3A | | | | | | | |
| B. Plan activities ^d | 16 | 1 | 16 | 6 | 96 | 4.8 | 9.6 | \$11,599.73 |
| C. Implement activities | N/A | | | | | | | |
| D. Develop record system | | | | | | | | |
| i. Control equipment ^d | 4 | 1 | 4 | 6 | 24 | 1.2 | 2.4 | \$2,899.93 |
| E. Time to enter information | | | | | | | | |
| i. Control device design ^d | 4 | 1 | 4 | 6 | 24 | 1.2 | 2.4 | \$2,899.93 |
| ii. Control equipment testing ^d | 1 | 1 | 1 | 6 | 6 | 0.3 | 0.6 | \$724.98 |
| iii. Control equipment inspection | 8 | 2 | 16 | 55 | 880 | 44 | 88 | \$106,330.84 |
| iv. Control equipment monitoring | 1 | 2 | 2 | 55 | 110 | 5.5 | 11 | \$13,291.36 |
| v. Control device CMS | 1 | 6 | 6 | 55 | 330 | 16.5 | 33 | \$39,874.07 |
| F. Time to train personnel | 4 | 1 | 4 | 55 | 220 | 11 | 22 | \$26,582.71 |
| G. Perform Audits | N/A | | | | | | | |
| H. Retain records of actual throughput (facilities exempt under 63.1270(f) ^e) | N/A | | | | | | | |
| Subtotal for Recordkeeping Requirements | | | | | 1,944 | | | \$204,203.55 |
| TOTAL LABOR BURDEN AND COST (rounded)^f | | | | | 2,910 | | | \$306,000 |
| TOTAL CAPITAL AND O&M COST (rounded)^f | | | | | | | | \$0 |
| GRAND TOTAL (rounded)^f | | | | | | | | \$306,000 |

Assumptions:

^a We have assumed that there are approximately 55 respondents subject to the rule, on average over the three year period. This includes an estimated 6 additional new or reconstructed sources becoming subject to the rule annually over the next three years.

^b This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$108.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, Table 2. Civilian Workers, by Occupational and Industry groups. 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.

^c It is estimated that each source will familiarize themselves with the rule requirements each year.

^d One-time requirement for the 6 new or reconstructed sources.

^e Respondents are expected to maintain records of actual annual throughput as a standard business practice; therefore, there is no additional burden associated with these records under this rule.

^f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) (Renewal)

| Activity | (A) EPA person- hours per occurrence | (B) No. of occurrences per plant per year | (C) EPA person- hours per plant per year (C=AxB) | (D) Plants per year ^a | (E) Technical person- hours per year (E=CxD) | (F) Management person-hours per year (Ex0.05) | (G) Clerical person- hours per year (Ex0.1) | (H) Cost, \$ ^b |
|--|--|---|--|--|--|---|--|------------------------------|
| Review reports | | | | | | | | |
| a. Initial notification | 2 | 1 | 2 | 6 | 12 | 0.6 | 1.2 | \$647.06 |
| b. Preconstruction review application | 4 | 1 | 4 | 6 | 24 | 1.2 | 2.4 | \$1,294.13 |
| c. Performance test notification | 2 | 1 | 2 | 6 | 12 | 0.6 | 1.2 | \$647.06 |
| d. Compliance status notification | 4 | 1 | 4 | 6 | 24 | 1.2 | 2.4 | \$1,294.13 |
| e. Semiannual periodic reports | 2 | 2 | 4 | 55 | 220 | 11 | 22 | \$11,862.84 |
| TOTAL ANNUAL BURDEN AND COST ^c | | | | | | 336 | | \$15,700 |

Assumptions:

^a We have assumed that there are approximately 55 respondents, which includes 6 additional new or reconstructed sources becoming subject to the rule annually over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.80 for Managerial, \$48.08 for Technical, and \$26.02 Clerical. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule” which excludes locality rates of pay.

^c Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.