

Table 1: Annual Respondent Burden and Cost – NESHAP for Natural Gas Transmission

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements ^c	2	1	2
B. Required activities	N/A		
C. Create information	N/A		
D. Gather existing information	4	1	4
E. Write Report			
i. Notification of construction/reconstruction ^d	2	1	2
ii. Notification of actual startup ^d	2	1	2
iii. Notification of date of CMS performance evaluation ^d	2	1	2
iv. Notification of planned date of performance test ^d	2	1	2
v. Notification of compliance status report ^d	4	1	4
vi. Semiannual Periodic Report	4	2	8
<i>Subtotal for Reporting Requirements</i>			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities ^d	16	1	16
C. Implement activities	N/A		
D. Develop record system			
i. Control equipment ^d	4	1	4
E. Time to enter information			
i. Control device design ^d	4	1	4
ii. Control equipment testing ^d	1	1	1
iii. Control equipment inspection	8	2	16
iv. Control equipment monitoring	1	2	2
v. Control device CMS	1	6	6
F. Time to train personnel	4	1	4
G. Perform Audits	N/A		
H. Retain records of actual throughput (facilities exempt under 63.1270(f)) ^e	N/A		
<i>Subtotal for Recordkeeping Requirements</i>			
TOTAL LABOR BURDEN AND COST (rounded)^f			

TOTAL CAPITAL AND O&M COST (rounded)^f
GRAND TOTAL (rounded)^f

Assumptions:

^a We have assumed that there are approximately 55 respondents subject to the rule, on average over the three year period 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 rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, Table 2. Civilian Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employees.

^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, the data is based on actual annual throughput.

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

and Storage (40 CFR Part 63, Subpart HHH) (Renewal)

	108.28	144.33	53.34	
(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
55	110	5.5	11	\$13,291.36
55	220	11	22	\$26,582.71
6	12	0.6	1.2	\$1,449.97
6	12	0.6	1.2	\$1,449.97
6	12	0.6	1.2	\$1,449.97
6	12	0.6	1.2	\$1,449.97
6	24	1.2	2.4	\$2,899.93
55	440	22	44	\$53,165.42
	968			\$101,739.28
6	96	4.8	9.6	\$11,599.73
6	24	1.2	2.4	\$2,899.93
6	24	1.2	2.4	\$2,899.93
6	6	0.3	0.6	\$724.98
55	880	44	88	\$106,330.84
55	110	5.5	11	\$13,291.36
55	330	16.5	33	\$39,874.07
55	220	11	22	\$26,582.71
	1,944			\$204,203.55
	2,910			\$306,000

				\$0
				\$306,000

r period. It is estimated that 6 additional new or reconstructed sources becoming subject

; \$108.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. These
ian Workers, by Occupational and Industry groups. The rates are from column 1, Total
se employed by private industry.

fore, there is no additional burden associated with these records under this rule.

of responses

6

6

6

6

6

110

140 Total Response

21 Hours/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transp

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
Review reports				
a. Initial notification	2	1	2	6
b. Preconstruction review application	4	1	4	6
c. Performance test notification	2	1	2	6
d. Compliance status notification	4	1	4	6
e. Semiannual periodic reports	2	2	4	55
TOTAL ANNUAL BURDEN AND COST^c				

Assumptions:

^a We have assumed that there are approximately 55 respondents, on average. It is estimated that 6 additional plants will be added in 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 Technical, and \$26.02 Clerical. These rates are from the Office of Personnel Management (OPM) “2017 G

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

mission and Storage (40 CFR Part 63, Subpart HHH) (Renewal)

48.08		64.8		26.02	
(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		
12	0.6	1.2	\$647.06		
24	1.2	2.4	\$1,294.13		
12	0.6	1.2	\$647.06		
24	1.2	2.4	\$1,294.13		
220	11	22	\$11,862.84		
336			\$15,700		

al new or reconstructed sources becoming subject to the rule annually over

for government overhead expenses: \$64.80 for Managerial, \$48.08 for
 eneral Schedule” which excludes locality rates of pay.