

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY)
(Proposed Rule)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments), EPA ICR Number 1967.07, OMB Control Number 2060-0540.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines were proposed on January 14, 2003, promulgated on March 5, 2004, and last amended on April 20, 2006. The regulations apply to any existing, new, or reconstructed stationary combustion turbine located at a major source of hazardous air pollutant (HAP) emissions. New stationary combustion turbines are defined as sources that commenced construction after January 14, 2003. On August 18, 2004, the standards were amended to stay the effectiveness for new lean pre-mix gas-fired turbines and diffusion flame gas-fired turbines due to a petition to delist new gas-fired turbines). Under the stay, new and reconstructed sources in either subcategory that are constructed or reconstructed after January 14, 2003, are required to submit initial notification reports, but are relieved of the obligation to comply with other reporting or monitoring requirements. Amendments to the NESHAP are being proposed as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below). This information is being collected to assure compliance with 40 CFR part 63, subpart YYYY.

In general, NESHAP require initial notifications, submission of performance test results, 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 5 years following the generation date of such maintenance reports and records. Currently, 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.

The “Affected Public” are owners or operators of stationary combustion turbines. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Amendments). 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 Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Amendments).

The proposed amendments to the rule eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan and SSM recordkeeping requirements; require electronic submittal of performance test results; lift the stay on lean premix gas-fired turbines and diffusion flame gas-fired turbines; and make miscellaneous technical and editorial changes. The remaining portions of the NESHAP remain unchanged.

Over the next 3 years, approximately 85 stationary combustion turbines at 44 facilities per year will be subject to these standards, including 39 facilities with gas-fired turbines, 3 facilities with landfill/digester gas-fired turbines, and 2 facilities with oil-fired stationary combustion turbines. In addition, approximately 82 new or reconstructed stationary combustion turbines at 44 facilities per year will become subject to these same standards, including 44 facilities with gas-fired turbines, 0 facilities with landfill/digester gas-fired turbines, and 0 facilities with oil-fired turbines.

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 CAA, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) of the CAA 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 stationary combustion turbines 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 YYYY.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section

112(f) of the CAA requires the EPA to determine whether the MACT emission limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, the EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

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 CAA. 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 parametric monitoring systems are used to ensure compliance with the 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 that the standards are being met. The performance test may also be observed.

The required annual or 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 YYYY.

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

The ICR will be available for public review during the public comment period following publication of the proposed subpart YYYY RTR in the Federal Register. All public comments received will be addressed in the ICR associated with the final rule.

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 3 years. The primary source used to determine facilities subject to subpart YYYY is EPA's Enforcement and Compliance History Online (ECHO) database. Applicable turbine units at these facilities were compiled using EPA's National Emissions Inventory (NEI) database, as well as review of facility permits and consultation with stakeholders. The growth rate for the industry is based on the average annual number of units constructed at these facilities, by fuel type.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed. In completing the subpart YYYY RTR and this associated ICR, we contacted several industry groups, including the Gas Turbine Association (GTA), the Utility Air Regulatory Group (UARG), and the Interstate Natural Gas Association of America (INGAA). Further stakeholder and public input is expected through public comment and follow-up meetings with interested stakeholders.

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 5 years. This is consistent with the General Provisions as applied to the 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 5 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 5 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 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 and operators of stationary combustion sources. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 63, Subpart YYYY)	SIC Codes	NAICS Codes
Utilities	49	221
Pipeline Transportation	46	486
Oil and Gas Extraction	13	211
Chemical Manufacturing	28	325
Petroleum and Coal Products Manufacturing	29	324

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY). Note that due to the stay of standards for gas-fired subcategories, respondents in the lean premix and diffusion flame gas-fired stationary combustion turbine subcategories were previously only required to comply with the initial notification requirements. As EPA is proposing to lift the stay for gas-fired turbines, these subcategories will now be required to comply with the reporting or monitoring requirements shown below.

A source must make the following reports:

Notifications	
<i>Landfill/Digester Gas-Fired, Emergency, and North Slope of Alaska Stationary Combustion Turbine Subcategories</i>	
Initial notification	63.6090(b), 63.6145(d)
<i>Oil-Fired & Gas-Fired Stationary Combustion Turbine Subcategories</i>	
Initial notification	63.6145, 63.9(b)
Notification of construction/reconstruction	63.6095(d), 63.6145, 63.5, 63.9(b)(5)(i)
Notification of actual startup date	63.6095(d), 63.6145, 63.9(b)(5)(ii)
Notification of performance test	63.7(b)(1), 63.7(c), 63.9(e), 63.6145(e)
Notification of CMS performance evaluation	63.8(e), 63.9(g)(1), 63.6145(a)
Notification of compliance status	63.9(h), 63.7, 63.8(e), 63.10(d)(2), 63.10(e)(2), 63.6145(a), 63.6145(f)

Reports	
<i>Landfill/Digester Gas-Fired Stationary Combustion Turbine Subcategory</i>	
Annual compliance report	63.6090(b)(2), 63.6150(c)
<i>Oil-Fired & Gas-Fired Stationary Combustion Turbine Subcategories</i>	
Excess emissions and parameter exceedance reports	63.10(e)(3)
Semiannual compliance reports	63.6150(a)

A source must keep the following records:

Recordkeeping	
<i>All Subcategories</i>	
Maintain records of monitoring data	63.7(g), 63.6155
Maintain records for 5 years	63.10(b), 63.6160(b)

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. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. The ERT can be accessed via the Compliance and Emissions Data Reporting Interface (CEDRI) and CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>).

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate the catalyst inlet temperature monitor.
Perform initial performance test, Reference Method 1, 1A, 3A, 3B, 4, 320, ASTM D6348-12e1, ANSI/ASME PTC 19-10-1981 (Part 10), ASTM D6522-11, and/or ASTM D6348-03 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.
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, 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 5 years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. During rule development, EPA conducted a regulatory impact analysis and concluded that the rule does not have a significant economic impact on small entities.

Due to technical considerations, which involve 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.

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 Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Amendments).

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 3 years from these recordkeeping and reporting requirements is estimated to be 3,751 hours (Average Labor Hours from Table 1D: Summary of Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments), Years 1 to 3). 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:

Civilian Labor Category	Occupational Code	BLS Mean Wage Estimate, in 2017\$^a	Loaded Wage (+110%), in 2017\$
Managerial	11-1021	\$59.35	\$124.64
Technical	51-8090	\$31.21	\$65.54
Clerical	43-6010	\$19.74	\$41.45

^a https://www.bls.gov/oes/current/oes_nat.htm#00-0000

These rates are from the United States Department of Labor, Bureau of Labor Statistics, survey titled “*May 2017 National Occupational Employment and Wage Estimates United States.*” The rates are from column 8, “Mean hourly wage.” 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 are 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 and other costs such as photocopying and postage.

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

The estimated total annualized capital startup cost is \$1,756 per respondent to install a catalyst inlet temperature continuous monitoring device. This is comprised of an annualized purchase cost of \$578 and an annualized installation cost of \$324 at a facility with an average of approximately two applicable turbine units. The installation cost assumes 30 technical, 1.5 managerial, and 3 clerical hours at labor rates of \$65.54, \$124.64, and \$41.45, respectively. As described previously, these rates are based on figures from the United States Department of Labor and have been increased by 110 percent to account for private industry benefit packages. Capital costs have been annualized over 10 years at 7% interest. Annualized capital costs have been applied to respondents with newly installed turbines and respondents that are completing ongoing compliance activities per the standards in subpart YYYY (hereafter referred to as “existing respondents”), as it has been assumed that the two existing respondents in the oil-fired subcategory have installed their temperature monitors within the past 7 years. The annual average capital/startup costs to install a catalyst inlet temperature continuous monitoring device for this ICR are \$146,371. Note that as process-related monitors (i.e., fuel and hour meters) are typically required to operate a turbine unit, costs for these devices have not been included.

No annual O&M costs are estimated for the catalyst inlet temperature monitor because it is expected to be maintenance-free.

An annual operation and maintenance cost for this subpart includes performance testing. Facilities with gas-fired and oil-fired turbines are required to conduct initial performance testing and annual compliance testing for formaldehyde using Method 320 (or an approved alternative). The EPA estimates that the cost of the testing is \$18,706 for a facility with one turbine and \$19,096 for a facility with two turbines; the EPA estimates that there is an average of two turbines required to be tested per facility and expects that annual performance testing for the two turbines will be conducted at the same time. Conservatively, initial performance testing is expected to be conducted separately to meet the compliance deadlines.

In the 3 years following promulgation, the estimated cost for formaldehyde performance testing is an average of \$1,589,123 per year. This consists of \$38,192 in Year 1, \$2,288,010 in Year 2, and \$2,441,168 in Year 3. The costs for each year were calculated as follows:

- In Year 1, there are no facilities with new turbines completing initial performance testing (\$18,706 per facility for Method 320 performance testing x 0 facilities = \$0) and two facilities conducting annual compliance testing (\$19,096 per facility for Method 320 performance testing x 2 facilities = \$38,192).
- In Year 2, there are nine facilities with new turbines completing initial performance testing (\$18,706 per facility for Method 320 performance testing x 9 facilities = \$168,354) and two facilities conducting annual compliance testing (\$19,096 per facility for Method 320 performance testing x 2 facilities = \$38,192). Also, due to the proposed lifting of the stay on gas-fired sources in Year 2, there are an additional 109 facilities with an average of two gas-fired turbines required to complete initial performance testing per facility (\$19,096 per facility for Method 320 performance testing x 109 facilities = \$2,081,464).

- In Year 3, there are eight facilities with new turbines completing initial performance testing (\$18,706 per facility for Method 320 performance testing x 8 facilities = \$149,648) and 120 facilities conducting annual compliance testing (\$19,096 per facility for Method 320 performance testing x 120 facilities = \$2,291,520).

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 3 years of the ICR is estimated to be \$96,916. Details upon which this estimate is based appear below in Table 2D. Summary of Burden and Cost to the Federal Government – NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Amendments), Years 1 to 3.

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

Agency Worker Rates	Labor Rates, \$/hr ^a	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$40.50	\$24.30	\$64.80
Technical (GS-12, step 1)	\$30.05	\$18.03	\$48.08
Clerical (GS-6, step 3)	\$16.26	\$9.76	\$26.02

^a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf

These rates are from the Office of Personnel Management (OPM), 2017 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.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next 3 years, approximately 44 existing respondents will be completing ongoing compliance activities per the standards in subpart YYYY. It is estimated that an additional 44 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 90 per year. Emergency stationary combustion turbines and units located on the North Slope of Alaska have not been included in burden estimates, as EPA is not aware of any units currently subject to recordkeeping and reporting requirements.

The number of respondents is calculated using the following table that addresses the 3 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 ^a	(B) Number of New Respondents that already submitted Initial Notification ^b	(C) Number of Existing Respondents	(D) Number of New Respondents that will submit initial notification and keep records but do not submit periodic reports ^a	(E) Number of Existing Respondents that keep records but do not submit reports ^c	(F) Number of Respondents (F=A+B+C+D)
<i>Gas-Fired Stationary Combustion Turbine Subcategories</i>						
1	0	0	0	8	101	8
2	8	109	0	0	0	117
3	8	0	117	0	0	125
Average	5	36	39	3	34	83
<i>Landfill/Digester Gas-Fired Stationary Combustion Turbine Subcategory</i>						
1	0	0	3	0	0	3
2	1	0	3	0	0	4
3	0	0	4	0	0	4
Average	0	0	3	0	0	4
<i>Oil-Fired Stationary Combustion Turbine Subcategories</i>						
1	0	0	2	0	0	2
2	1	0	2	0	0	3
3	0	0	3	0	0	3
Average	0	0	2	0	0	3
TOTAL	5	36	44	3	34	90

Note: Figures may not add exactly due to rounding.

^a New respondents include sources with affected facilities constructed or reconstructed after January 14, 2003. In Year 1, new gas-fired sources must submit initial notifications, but are not subject to any additional monitoring or reporting requirements due to the stay of standards. For this reason, new natural gas-fired units have been accounted for in Column D for Year 1.

^b As described previously, EPA is proposing to lift the stay on natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require the existing gas-fired combustion turbines that previously submitted initial notifications as well as the Year 1 new natural gas units to comply with the remaining reporting requirements for new units, as shown in Column B.

^c Column E reflects gas-fired sources that submitted initial notifications prior to Year 1 of this ICR. These sources have not been subject to any additional monitoring or reporting requirements due to the stay of standards. For this reason, these existing natural gas-fired units have been accounted for in Column E are not counted as respondents for Year 1.

Column E is not included in the average Number of Respondents to avoid double-counting. As shown above, the average Number of Respondents over the three-year period of this ICR is 90.

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) Total Annual Responses D=BxC
<i>Gas-Fired Stationary Combustion Turbine Subcategories</i>			
Initial notification	8	1	8
Notification of construction/reconstruction	41	1	41
Notification of actual startup	41	1	41
Notification of performance test	41	1	41
Notification of CMS performance evaluation	41	1	41
Notification of compliance status	41	1	41
Semiannual compliance report ^a	39	2	78
Subtotal			291
<i>Landfill/Digester Gas-Fired Stationary Combustion Turbine Subcategory</i>			
Initial notification	0	1	0
Annual compliance report ^b	3	1	3
Subtotal			3
<i>Oil-Fired Stationary Combustion Turbine Subcategories</i>			
Initial notification	0	1	0
Notification of construction/reconstruction	0	1	0
Notification of actual startup	0	1	0
Notification of performance test	0	1	0
Notification of CMS performance evaluation	0	1	0
Notification of compliance status	0	1	0
Semiannual compliance report ^a	2	2	4
Subtotal			4
TOTAL			298

^a This activity applies to new and existing natural gas-fired and oil-fired sources.

^b This activity applies to new and existing landfill/digester gas-fired sources.

The number of Total Annual Responses is 298.

The total annual labor costs are \$247,594 per year. Details regarding these estimates may be found below in Table 1D: Summary of Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments), Years 1 to 3.

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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 3,751 hours. Details regarding these estimates may be found below in Table 1D: Summary of Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR part 63, subpart YYYY) (Amendments), Years 1 to 3.

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 24 hours per response.

The total annualized capital/startup and O&M costs to the regulated entity are \$1,735,494. 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 next three years is estimated to be 2,067 labor hours at a cost of \$96,916. See below in Table 2D. Summary of Burden and Cost to the Federal Government – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments), Years 1 to 3.

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

This ICR is prepared for amendments to the NESHAP for Stationary Combustion Turbines (40 CFR, Part 63, Subpart YYYY). These amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart YYYY) to remove the SSM exemption and SSM plan; (2) require electronic submittal of performance test results; (3) lift the stay of standards for the natural gas subcategories of stationary combustion turbines; and (4) make technical and editorial changes. Where applicable, adjustments for these amendments are reflected in Tables 1 and 2 of this ICR.

The number of turbine units subject to the standards changed based on review of subpart YYYY facilities included in EPA's Enforcement and Compliance History Online (ECHO) database and consultation with industry representatives and state/local agencies. Further, the

number of units/respondents was adjusted to account for natural gas-fired turbines that will become subject to additional requirements once the stay has been lifted.

The burden estimate for reading and understanding the rule requirements was adjusted to reflect the time it would take industry to review the amended rule, including becoming familiar with the new requirement to electronically submit performance test results. Eight hours in Year 1 have been estimated for affected natural gas-fired units to read and understand the requirements of the amended rule. Four hours in Year 1 have been assumed for oil-fired units and landfill/digester gas-fired units to become familiar with the amended regulations, as these units are less affected or unaffected by the proposed amendments to the rule. One hour per unit in Year 1 has been assumed for units with no requirements for subpart YYYY to read the amended regulations and confirm that they are unaffected by the proposed amendments to the rule.

The burden estimate for conducting performance testing was adjusted to add the cost for a testing contractor to conduct the required initial and subsequent annual testing and to add labor hours for facility personnel to supervise the subsequent annual tests. The previous burden estimate included only the labor hours for facility personnel to supervise the initial test.

The burden estimate for performance test report submittal was not adjusted to account for the new requirement that results of performance tests would be reported electronically through CEDRI using the ERT. The burden estimate of 2 hours in the current ICR for paper format submittal of performance test results is an appropriate estimate for electronic submittal of performance test results.

The proposed removal of the SSM exemption would result in the emissions standards in the rule applying at all times. Based on discussions with affected entities, we believe facilities are already operating control technologies during all periods of operation and therefore would incur no costs associated with additional operation of controls. We estimate that the burden associated with the separate recordkeeping requirements for periods of SSM that are being removed to be approximately the same as the burden associated with the recordkeeping requirements for deviations from rule requirements and, therefore, did not adjust burden for recordkeeping and semiannual compliance reporting. We also proposed to eliminate the requirement for the development of a SSM plan as required under the General Provisions (40 CFR 63.6(e)(3)). Subpart YYYY required this plan to be developed by the compliance date of March 5, 2004 or startup for new or reconstructed sources, with no requirement for updates to the plan. Because there is no requirement for updates, no cost savings are estimated for the proposed removal of this provision. All affected facilities are anticipated to experience a small cost savings associated with the proposed removal of recordkeeping requirements specific to SSM events. Currently, facilities are required to maintain SSM records, as outlined under 40 CFR 63.6155(a)(3) and the General Provisions (40 CFR 63.6(e)(3)).

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 24 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-OAR-2017-0688. 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-OAR-2017-0688 and OMB Control Number 2060-0540 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 1A: Annual Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments) – Year 1

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements								
Natural gas-fired units ^c	8	1	8	109	872.0	43.6	87.2	\$66,201
Oil-fired and landfill/digester gas-fired units ^c	4	1	4	5	20.0	1.0	2.0	\$1,518
Other turbine units (all fuel types) ^c	1	1	1	128	128.0	6.4	12.8	\$9,718
B. Required Activities								
Initial CMS performance evaluation ^d	12	1	12	0	0.0	0.0	0.0	\$0
Performance test ^e	12	1	12	2	24.0	1.2	2.4	\$1,822
C. Create Information	See 3B							
D. Gather Existing Information	See 3B							
E. Write Report								
Initial notification ^f	2	1	2	8	16.0	0.8	1.6	\$1,215
Notification of construction/reconstruction ^g	2	1	2	0	0.0	0.0	0.0	\$0
Notification of actual startup ^g	2	1	2	0	0.0	0.0	0.0	\$0
Notification of performance test ^g	2	1	2	0	0.0	0.0	0.0	\$0
Notification of CMS performance evaluation ^g	2	1	2	0	0.0	0.0	0.0	\$0
Notification of compliance status ^g	2	1	2	0	0.0	0.0	0.0	\$0
Annual compliance report ^h	8	1	8	3	24.0	1.2	2.4	\$1,822
Semiannual compliance reports ⁱ	8	2	16	2	32.0	1.6	3.2	\$2,429
Subtotal for Reporting Requirements						1,283.4		\$84,725
4. Recordkeeping Requirements								
A. Familiarization with the regulatory requirements	See 3A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							
D. Time to Enter Information								
Records of operating parameters ^j	0.5	12	6	5	30.0	1.5	3.0	\$2,278
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements					34.5			\$2,278
TOTAL ANNUAL BURDEN AND COST					1,317.9			\$87,002
Annualized Capital and O&M Cost (see Section 6(b)(iii)):								\$41,705
TOTAL COST:								\$128,707

Assumptions:

- ^a. We estimate eight new natural gas-fired sources, no new landfill/digester gas-fired sources, and no new oil-fired sources will become subject to the rule during Year 1 of this ICR. We also estimate 106 existing respondents are subject, comprising 101 facilities with gas-fired turbines, three facilities with landfill/digester gas-fired turbines, and two facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.
- ^b. This ICR uses the following labor rates: \$65.54 for technical, \$124.64 for managerial, and \$41.45 for clerical labor from the United States Department of Labor, Bureau of Labor Statistics.
- ^c. We assume 8 hours per unit in Year 1 for affected natural gas-fired units to read and understand the requirements of the amended rule. Four hours per unit in Year 1 have been assumed for oil-fired and landfill/digester gas-fired units to become familiar with the amended regulations, as these units are less affected by the proposed amendments to the rule. One hour per unit in Year 1 has been assumed for other turbine units to read the amended regulations, as these units are unaffected by the proposed amendments to the rule. Other turbine units include units with a rated peak power output of less than 1.0 MW, units constructed before January 14, 2003, emergency units, units located on the North Slope of Alaska, and units burning fuels not regulated by subpart YYYY.
- ^d. We assume 12 hours are required to complete the CMS performance evaluation. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^e. We assume 12 hours are required to complete the performance test. This activity only applies to new and existing sources in the oil-fired turbine subcategories for Year 1 and to new and existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

- ^{f.} We assume 2 hours are required to prepare each notification. This activity applies to new sources in all subcategories.
- ^{g.} We assume 2 hours are required to prepare each notification. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^{h.} We assume 8 hours are required to prepare annual compliance reports. This activity only applies to existing sources in the landfill/digester gas-fired turbine subcategory.
- ^{i.} We assume 8 hours are required to prepare semiannual compliance reports. This activity only applies to existing sources in the oil-fired turbine subcategories for Year 1 and to existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^{j.} We assume 1 half-hour is required to record operating parameters. This activity only applies to existing sources in the oil-fired turbine and landfill/digester gas subcategories for Year 1 and to existing sources in all subcategories in Years 2 and 3.

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (Cx D)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Records of operating parameters ^j	0.5	12	6	5	30.0	1.5	3.0	\$2,278
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						34.5		\$2,278
TOTAL ANNUAL BURDEN AND COST						4,809.3		\$317,490
Annualized Capital and O&M Cost (see Section 6(b)(iii)):								\$2,498,784
TOTAL COST:								\$2,816,274

Assumptions:

- ^a. We estimate 117 new natural gas-fired sources, one new landfill/digester gas-fired sources, and one new oil-fired sources will become subject to the rule during Year 2 of this ICR. We also estimate five existing respondents are subject, comprising no facilities with gas-fired turbines, three facilities with landfill/digester gas-fired turbines, and two facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.
- ^b. This ICR uses the following labor rates: \$65.54 for technical, \$124.64 for managerial, and \$41.45 for clerical labor from the United States Department of Labor, Bureau of Labor Statistics.
- ^c. We assume 4 hours are required to read instructions. This activity applies to new sources in all subcategories.
- ^d. We assume 12 hours are required to complete the CMS performance evaluation. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^e. We assume 12 hours are required to complete the performance test. This activity only applies to new and existing sources in the oil-fired turbine subcategories for Year 1 and to new and existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^f. We assume 2 hours are required to prepare each notification. This activity applies to new sources in all subcategories.
- ^g. We assume 2 hours are required to prepare each notification. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^h. We assume 8 hours are required to prepare annual compliance reports. This activity only applies to existing sources in the landfill/digester gas-fired turbine subcategory.
- ⁱ. We assume 8 hours are required to prepare semiannual compliance reports. This activity only applies to existing sources in the oil-fired turbine subcategories for Year 1 and to existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

^j We assume 1 half-hour is required to record operating parameters. This activity only applies to existing sources in the oil-fired turbine and landfill/digester gas subcategories for Year 1 and to existing sources in all subcategories in Years 2 and 3.

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Records of operating parameters ^j	0.5	12	6	124	744.0	37.2	74.4	\$56,483
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						855.6		\$56,483
TOTAL ANNUAL BURDEN AND COST						5,124.4		\$338,291
Annualized Capital and O&M Cost (see Section 6(b)(iii)):								\$2,665,993
TOTAL COST:								\$3,004,285

Assumptions:

- ^a. We estimate eight new natural gas-fired sources, no new landfill/digester gas-fired sources, and no new oil-fired sources will become subject to the rule during Year 3 of this ICR. We also estimate 124 existing respondents are subject, comprising 117 facilities with gas-fired turbines, four facilities with landfill/digester gas-fired turbines, and three facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.
- ^b. This ICR uses the following labor rates: \$65.54 for technical, \$124.64 for managerial, and \$41.45 for clerical labor from the United States Department of Labor, Bureau of Labor Statistics.
- ^c. We assume 4 hours are required to read instructions. This activity applies to new sources in all subcategories.
- ^d. We assume 12 hours are required to complete the CMS performance evaluation. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^e. We assume 12 hours are required to complete the performance test. This activity only applies to new and existing sources in the oil-fired turbine subcategories for Year 1 and to new and existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^f. We assume 2 hours are required to prepare each notification. This activity applies to new sources in all subcategories.
- ^g. We assume 2 hours are required to prepare each notification. This activity only applies to new sources in the oil-fired turbine subcategories for Year 1 and to new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^h. We assume 8 hours are required to prepare annual compliance reports. This activity only applies to existing sources in the landfill/digester gas-fired turbine subcategory.
- ⁱ. We assume 8 hours are required to prepare semiannual compliance reports. This activity only applies to existing sources in the oil-fired turbine subcategories for Year 1 and to existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

^j We assume 1 half-hour is required to record operating parameters. This activity only applies to existing sources in the oil-fired turbine and landfill/digester gas subcategories for Year 1 and to existing sources in all subcategories in Years 2 and 3.

Table 1D. Summary of Respondent Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYYY) (Amendments), Years 1 to 3

Year	No. new respondents	No. existing respondents	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs	Non-Labor Costs	Total annualized cost
								Annualized capital & O&M	
1	8	5	1,146.0	57.3	114.6	1,317.9	\$87,002	\$41,705	\$128,707
2	119	5	4,182.0	209.1	418.2	4,809.3	\$317,490	\$2,498,784	\$2,816,274
3	8	124	4,456.0	222.8	445.6	5,124.4	\$338,291	\$2,665,993	\$3,004,285
Totals	135	134	9,784.0	489.2	978.4	11,251.6	\$742,783	\$5,206,482	\$5,949,265
Average	44	44				3,750.5	\$247,594	\$1,735,494	\$1,983,088

Note: Figures may not add exactly due to rounding.

Table 2A: Average Annual EPA Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments) – Year 1

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Units per Year ^a	(E) Technical Hours per Year (Cx D)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
Initial notification ^c	2	1	2	8	16.0	0.8	1.6	\$863
Notification of construction/reconstruction ^d	2	1	2	0	0.0	0.0	0.0	\$0
Notification of actual startup ^d	2	1	2	0	0.0	0.0	0.0	\$0
Notification of performance test ^d	2	1	2	0	0.0	0.0	0.0	\$0
Notification of CMS performance evaluation ^d	2	1	2	0	0.0	0.0	0.0	\$0
Notification of compliance status ^e	18	1	18	0	0.0	0.0	0.0	\$0
Annual compliance report ^f	8	1	8	3	24.0	1.2	2.4	\$1,294
Semiannual compliance reports ^g	8	2	16	2	32.0	1.6	3.2	\$1,726
TOTAL ANNUAL BURDEN AND COST						82.8		\$3,882

Assumptions:

- ^a. We estimate eight new natural gas-fired sources, no new landfill/digester gas-fired sources, and no new oil-fired sources will become subject to the rule during Year 1 of this ICR. We also estimate 106 existing respondents are subject, comprising 101 facilities with gas-fired turbines, three facilities with landfill/digester gas-fired turbines, and two facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.
- ^b. This ICR uses the following labor rates: \$48.08 for technical, \$64.80 for managerial, and \$26.02 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2017 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.
- ^c. We assume 2 hours are required to review each initial notification. This activity applies for new sources in all subcategories.
- ^d. We assume 2 hours are required to review each notification. This activity only applies for new sources in the oil-fired turbine subcategories for Year 1 and for new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^e. We assume that performance test and CMS performance evaluation reports will be submitted for review concurrently with the notification of compliance status, and that a total of 16 hours will be required to review each compliance notification (2 hours), performance test report (8 hours), and performance evaluation report (8 hours).

- ^f We assume 8 hours are required to review each annual compliance report. This activity only applies for existing sources in the landfill/digester gas-fired turbine subcategory.
- ^g We assume 8 hours are required to review each semiannual compliance report. This activity only applies for existing sources in the oil-fired turbine subcategories for Year 1 and to existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

Table 2B: Average Annual EPA Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYYY) (Amendments) – Year 2

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Units per Year ^a	(E) Technical Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
Initial notification ^c	2	1	2	10	20.0	1.0	2.0	\$1,078
Notification of construction/reconstruction ^d	2	1	2	118	236.0	11.8	23.6	\$12,726
Notification of actual startup ^d	2	1	2	118	236.0	11.8	23.6	\$12,726
Notification of performance test ^d	2	1	2	118	236.0	11.8	23.6	\$12,726
Notification of CMS performance evaluation ^d	2	1	2	118	236.0	11.8	23.6	\$12,726
Notification of compliance status ^e	18	1	18	118	2,124.0	106.2	212.4	\$114,530
Annual compliance report ^f	8	1	8	3	24.0	1.2	2.4	\$1,294
Semiannual compliance reports ^g	8	2	16	2	32.0	1.6	3.2	\$1,726
TOTAL ANNUAL BURDEN AND COST						3,615.6		\$169,531

Assumptions:

^a. We estimate 117 new natural gas-fired sources, one new landfill/digester gas-fired sources, and one new oil-fired sources will become subject to the rule during Year 2 of this ICR. We also estimate five existing respondents are subject, comprising no facilities with gas-fired turbines, three facilities with landfill/digester gas-fired turbines, and two facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.

^b. This ICR uses the following labor rates: \$48.08 for technical, \$64.80 for managerial, and \$26.02 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2017 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.

^c. We assume 2 hours are required to review each initial notification. This activity applies for new sources in all subcategories.

^d. We assume 2 hours are required to review each notification. This activity only applies for new sources in the oil-fired turbine subcategories for Year 1 and for new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

^e. We assume that performance test and CMS performance evaluation reports will be submitted for review concurrently with the notification of compliance status, and that a total of 16 hours will be required to review each compliance notification (2 hours), performance test report (8 hours), and performance evaluation report (8 hours).

- ^f We assume 8 hours are required to review each annual compliance report. This activity only applies for existing sources in the landfill/digester gas-fired turbine subcategory.
- ^g We assume 8 hours are required to review each semiannual compliance report. This activity only applies for existing sources in the oil-fired turbine subcategories for Year 1 and to existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

Table 2C: Average Annual EPA Burden and Cost – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYY) (Amendments) – Year 3

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Units per Year ^a	(E) Technical Hours per Year (Cx D)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
Initial notification ^c	2	1	2	8	16.0	0.8	1.6	\$863
Notification of construction/reconstruction ^d	2	1	2	8	16.0	0.8	1.6	\$863
Notification of actual startup ^d	2	1	2	8	16.0	0.8	1.6	\$863
Notification of performance test ^d	2	1	2	8	16.0	0.8	1.6	\$863
Notification of CMS performance evaluation ^d	2	1	2	8	16.0	0.8	1.6	\$863
Notification of compliance status ^e	18	1	18	8	144.0	7.2	14.4	\$7,765
Annual compliance report ^f	8	1	8	4	32.0	1.6	3.2	\$1,726
Semiannual compliance reports ^g	8	2	16	120	1,920.0	96.0	192.0	\$103,530
TOTAL ANNUAL BURDEN AND COST						2,502.4		\$117,334

Assumptions:

- ^a. We estimate eight new natural gas-fired sources, no new landfill/digester gas-fired sources, and no new oil-fired sources will become subject to the rule during Year 3 of this ICR. We also estimate 124 existing respondents are subject, comprising 117 facilities with gas-fired turbines, four facilities with landfill/digester gas-fired turbines, and three facilities with oil-fired turbines. As described previously, EPA is proposing to lift the stay on standards for natural gas-fired combustion turbines. EPA is assuming that the proposed lifting of the stay will be finalized by Year 2, which will require subject natural gas units to comply with the requirements for new units. Under the stay, gas-fired sources that previously submitted initial notifications are not subject to any additional monitoring or reporting requirements.
- ^b. This ICR uses the following labor rates: \$48.08 for technical, \$64.80 for managerial, and \$26.02 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2017 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.
- ^c. We assume 2 hours are required to review each initial notification. This activity applies for new sources in all subcategories.
- ^d. We assume 2 hours are required to review each notification. This activity only applies for new sources in the oil-fired turbine subcategories for Year 1 and for new sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.
- ^e. We assume that performance test and CMS performance evaluation reports will be submitted for review concurrently with the notification of compliance status, and that a total of 16 hours will be required to review each compliance notification (2 hours), performance test report (8 hours), and performance evaluation report (8 hours).

- ^f We assume 8 hours are required to review each annual compliance report. This activity only applies for existing sources in the landfill/digester gas-fired turbine subcategory.
- ^g We assume 8 hours are required to review each semiannual compliance report. This activity only applies for existing sources in the oil-fired turbine subcategories for Year 1 and for existing sources in the gas-fired and oil-fired turbine subcategories in Years 2 and 3.

Table 2D. Summary of Burden and Cost to the Federal Government – NESHAP for Stationary Combustion Turbines (40 CFR Part 63, Subpart YYYYY) (Amendments), Years 1 to 3

Year	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs
1	72.0	3.6	7.2	82.8	\$3,882
2	3,144.0	157.2	314.4	3,615.6	\$169,531
3	2,176.0	108.8	217.6	2,502.4	\$117,334
Totals	5,392.0	269.6	539.2	6,200.8	\$290,747
Average				2,066.9	\$96,916