

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (Renewal), EPA ICR Number 2177.07, OMB Control Number 2060-0582.

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) were proposed on February 18, 2005, and promulgated on July 6, 2006. These regulations apply to new stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart KKKK

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of 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 NSPS.

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

The “Affected Public” constitutes private-sector businesses that operate stationary combustion turbines. There are approximately 683 stationary combustion turbine facilities. None of the 683 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (Renewal). The Federal Government’s ‘burden’ is attributed entirely to work performed by either Federal employees or government contractors. The ‘burden’ to the Federal Government may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (Renewal).

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

Over the next three years, approximately 683 respondents per year will be subject to these standards, and 47 additional respondents per year will become subject to these same standards, for a total of 730 respondents per year.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance”.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) 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 NSPS were promulgated for this source category at 40 CFR Part 60, Subpart KKKK

### **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 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 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 60, Subpart KKKK.

### **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* 83 FR 24785) on May 30, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

### **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. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 730 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 both the Western States Petroleum Associate, at (916) 498-9203, and the Engine Manufacturers Association (EMA), at (312) 827-8700. It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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.

### **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 stationary combustion turbines. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and their corresponding North American Industry Classification System (NAICS) codes are listed below:

<b>Standard (40 CFR Part 60, Subpart KKKK)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Electric Power Generation	4911, 4931, 4939	2211
Pipeline Transportation of Natural Gas	4923, 4922	486210
Crude Petroleum and Natural Gas Extraction	1311	211111
Natural Gas Liquid Extraction	1321, 2819	211112
Utilities	4911, 4931, 4939, 4923, 4924, 4925, 4932, 4941, 4971, 4952, 4961	221

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK).

A source must make the following reports:

<b>Notifications</b>	
Excess emission and monitoring performance report	§§60.7(c), 60.4375(a)
Report of the results of the performance test	§§60.8(a), 60.4375(b)
Notification of construction/reconstruction	§60.7(a)(1)
Notification of actual startup	§60.7(a)(3)
Notification of performance test	§60.8(a)
Notification of CEMS demonstration	§60.7(a)(5)

<b>Reports</b>	
Semiannual Compliance Report	§60.7(d)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative.	§60.7(b)
Maintain a file of all measurements, including CMS, monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records, except some CEMS sub-hourly measurements.	§60.7(f)

### 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for fuel consumption and water-to-fuel or steam to fuel ratio or operate NO <sub>x</sub> CEMS.
Perform initial performance test, Reference Method 1, 2, 3A, 6, 6C, 7E, 8, 19, and 20 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

<b>Respondent Activities</b>
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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:

<b>Agency Activities</b>
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. 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 two years.

### **5(c) Small Entity Flexibility**

The 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 this 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.

### **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 – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (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 76,100 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**



### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “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 the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

### **(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.

### **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 \$112,000.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which

this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (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 683 existing respondents will be subject initially to these standards. Also, it is estimated that an additional 47 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 730 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 <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	47	636	0	0	683
2	47	683	0	0	730
3	47	730	0	0	777
Average	47	683	0	0	730

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

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 730.

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
Notification of construction/reconstruction	47	1	0	47
Notification of actual startup	47	1	0	47

<b>Total Annual Responses</b>				
Notification of performance test	199	1	0	199
Notification of demonstration of CEMS	15	1	0	15
Initial notification of compliance	47	1	0	47
Semiannual compliance report	730	2	0	1460
			Total	1,815

The number of Total Annual Responses is 1,815.

The total annual labor costs are \$8,670,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (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 below in Tables 1 and 2, respectively, and summarized below.

##### **(i) Respondent Tally**

The total annual labor hours are 76,100 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (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 42 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 2,360 labor hours at a cost of \$112,000; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (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 adjustment increase in burden hours and costs for both the respondents and the Agency as currently identified in the OMB Inventory of Approved Burdens. The increase is not due to any program changes. The increase is due to an adjustment in the number of new or modified sources. This ICR assumes the respondent universe subject to the regulation has continued to grow at a constant rate since the last ICR renewal. The increase in the number of respondents also results in an increase in the number of responses.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 42 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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-2012-0524. 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-2012-0524 and OMB Control Number 2060-0582 in any correspondence.

**Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost –NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0. 1)	(H) Total Cost per year, \$ <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements <sup>c</sup>	4	1	4	730	2,920	146.0	292.0	\$382,496.64
B. Required activities								
- Performance test <sup>d</sup>	12	1	12	199	2,388	119.4	238.8	\$312,808.90
- Fuel sampling – dual fuel turbines <sup>e</sup>	0.5	52	26	106	2,756	137.8	275.6	\$361,013.95
- Fuel sampling – distillate oil only turbines <sup>f</sup>	0.5	5	2.5	7	17.5	0.88	1.75	\$2,292.36
C. Gather existing information	See 3D							
D. Write report								
Notification of construction/ reconstruction <sup>g, h</sup>	2	1	2	47	94	4.7	9.4	\$12,313.25
Notification of actual startup <sup>g, h</sup>	2	1	2	47	94	4.7	9.4	\$12,313.25
Notification of performance test <sup>d</sup>	2	1	2	199	398	19.9	39.8	\$52,134.82
Notification of demonstration of CEMS <sup>i</sup>	2	1	2	15	30	1.5	3	\$3,929.76
Initial notification of compliance <sup>g, h</sup>	2	1	2	47	94	4.7	9.4	\$12,313.25

Semiannual Compliance report j, k	8	2	16	730	11,680	584	1168	\$1,529,986. 56
<b>Subtotal for Reporting Requirements</b>					<b>23,542</b>			<b>\$2,681,603</b>
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirement <sup>c</sup>	See 3A							
B. Train personnel <sup>h</sup>	40	1	40	47	1,880	94	188	\$246,264.96
C. Continuous monitoring								
- Record information <sup>k, l</sup>	5	12	60	730	43,800	2,190	4,380	\$5,737,449. 60
<b>Subtotal for Recordkeeping Requirements</b>					<b>52,532</b>			<b>\$5,983,715</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>m</sup></b>					<b>76,100</b>			<b>\$8,670,000</b>
<b>Capital and O&amp;M Cost<sup>m</sup></b>								<b>\$0</b>
<b>Grand Total<sup>m</sup></b>								<b>\$8,670,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there is an average of 730 sources currently subject to the regulations, including 683 existing respondents, and an additional 47 respondents per year who will become subject to the standards. This ICR assumes the industry continues to grow at a constant rate since the previous renewal.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, 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.

<sup>c</sup> We have assumed that it will take 4 hours for respondents to familiarize with regulatory requirements and that all sources will have to familiarize with regulatory requirements.

<sup>d</sup> We have assumed that 199 respondents will each take 12 hours to conduct annual stack testing to demonstrate compliance with NOx emission limitation.

<sup>e</sup> We have assumed that 106 respondents will each take 0.5 hours 52 times per year to complete fuel sampling for the dual fuel turbines.

<sup>f</sup> We have assumed that seven respondents will each take 0.5 hours 5 times per year to complete the fuel sampling for the distillate oil only turbines.

<sup>g</sup> We have assumed that it will take each new respondent 2 hours to write notification report.

<sup>h</sup> We have assumed that this is a one-time report for new respondents.

<sup>i</sup> We have assumed that of the 47 new respondents each year, 15 of these respondents will write reports demonstrating CEMS compliance.

<sup>j</sup> We have assumed that each of the respondents will take 8 hours twice per year to write the compliance report.

<sup>k</sup> The average number of existing respondents is 730.

<sup>l</sup> We have assumed that it will take each respondent 5 hours twelve times per year to record information.

<sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK)(Renewal)**

Activity	(A) EPA person- hours per occurrence e	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Cost, \$ <sup>b</sup>
Report Review								
1. Notification of construction/reconstruction <sup>c</sup>	1	1	1	47	47	2.35	4.7	\$2,569.65
2. Notification of actual startup <sup>d</sup>	0.5	1	0.5	47	23.5	1.18	2.35	\$1,284.83
3. Notification of performance test	2	1	2	199	398	19.9	39.8	\$21,760.05
4. Notification of demonstration of CEMS <sup>e</sup>	2	1	2	15	30	1.5	3	\$1,640.21
5. Initial notification of compliance	2	1	2	47	94	4.7	9.4	\$5,139.31
6. Semiannual compliance report <sup>f</sup>	2	1	2	730	1460	73	146	\$79,823.31
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>						<b>2,360</b>		<b>\$112,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there is an average of 730 sources currently subject to the regulations and an additional 47 respondents per year will become subject. The ICR assumes the industry continues to grow at a constant rate since the previous renewal.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$65.71 for Managerial, \$48.75 for Technical, and \$26.38 Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that new respondents will take one hour each to review the notification of construction/reconstruction report.

<sup>d</sup> We have assumed that it will take 0.5 hours for new respondents to review the actual startup report.

<sup>e</sup> We have assumed that of the 47 new respondents, only 15 of these respondents will review the notification of demonstration of CEMS report.

<sup>f</sup> We have assumed that it will take 2 hours once per year to review the compliance report.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.