

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units
(40 CFR part 60, subpart TTTT) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (Renewal), EPA ICR Number 2465.04, OMB Control Number 2060-0685.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) were proposed on June 2, 2014, and promulgated on October 23, 2015 (80 FR 64510). These regulations apply to newly constructed, modified or reconstructed facilities with electric utility generating units (EGUs) including any steam generating unit, IGCC, or stationary combustion turbine that commenced construction after January 8, 2014 or commenced reconstruction after June 18, 2014. To be considered an EGU the unit must be: (1) capable of combusting more than 250 MMBtu/h heat input of fossil fuel; and (2) serve a generator capable of supplying more than 25 MW net to a utility distribution system (i.e., for sale to the grid). 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 TTTT.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. This NSPS imposes a minimal information collection burden on affected sources beyond what sources would already be subject to under the authorities of CAA parts 75 (Acid Rain Program CEM requirements) and 98 (Mandatory GHG Reporting, applicable to EGUs that capture CO₂). OMB has previously approved the information collection requirements contained in the existing part 75 and 98 regulations (40 CFR part 75 and 40 CFR part 98) under the provisions of the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. and has assigned OMB control numbers 2060-0626 and 2060-0629, respectively. Apart from certain reporting costs to comply with the emission standards under the rule, there are no additional information collection costs, as the information required by the rule is already collected and reported by other regulatory programs. 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 three 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's (EPA) regional offices.

The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (Renewal). The ‘burden’ to the “Federal Government” 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 – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (Renewal). There are approximately 32 facilities, operating 12 affected NGCC units and 25 affected natural gas-fired simple cycle CT units, which are owned and operated by the Electric Utility industry. None of the 32 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.

Based on our consultations with industry representatives, there are an average of 1.1 affected unit 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 32 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 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, CO₂ emissions from EGUs 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 TTTT.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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.

The rule requires continuous emission monitors to measure CO₂ concentration, stack gas flow rate, and stack gas moisture content in accordance with 40 CFR part 75 in order to determine hourly CO₂ mass emissions rates. The rule allows owners or operators of EGUs that burn exclusively gaseous or liquid fuels to install fuel flow meters and monitor fuel flow rate, the gross calorific value (GCV) of the fuel, unit operating time, and gross output in place of a continuous emissions monitor. The initial performance compliance demonstration consists of calculating the CO₂ mass emissions rate using the first 12 operating months of data (hourly CO₂ average concentration, mass flow rate, and electrical power generation) on a rolling average basis.

Owners or operators of newly constructed, modified, or reconstructed units are required to comply with the notification, reporting, and recordkeeping requirements in the section 111 regulatory general provisions (40 CFR part 60, subpart A), in 40 CFR part 75, and in 40 CFR part 98. Owners or operators must record hourly average CO₂ emissions concentration, hourly average flow rate, unit operating time, and gross electric generation, and keep records of calculations performed in determining compliance. **The notifications, reports, and records required in these standards are used to:** 1) inform the Agency or delegated authority when newly constructed, modified, and reconstructed EGUs become subject to these standards; 2) ensure that the NSPS is being properly applied; 3) identify those facilities that should be inspected; 4) identify those facilities that may benefit from compliance assistance activities; and 5) ensure that process and emissions control/monitoring equipment are being properly operated and maintained on a continuous basis.

The required quarterly 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 TTTT.

3(a) Non-duplication

If the subject standard(s) 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 32 respondents will be subject to these same standards over the three-year period covered by this ICR.

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 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 Electric Power Research Institute (EPRI), at (800) 313-3774, and the Edison Electric Institute (EEI), at (202)508-5000. In the light of potential interest among governmental entities, we also initiated consultations with governmental entities, including the National Conference of State Legislatures, at (202) 624-5400, and the Environmental Council of States, at (202) 266-4920.

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 fossil fuel-fired electric utility steam generating units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards are included in the table below:

Standard (40 CFR Part 60, Subpart TTTT)	SIC Codes	NAICS Codes
Fossil Fuel Electric Power Generation	4931, 4939, 4911	221112
Electric Power Generation, Transmission and Distribution	4931, 4939, 4911	2211
Fossil fuel electric power generating units in Indian Country	8641	921150

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT)

A source must make the following reports:

Notifications	
Notification of construction	§60.7(a)(1), §60.5550(a)
Notification of startup	§60.7(a)(3), §60.5550(a)

Reports	
Electronic quarterly compliance reports (includes excess emissions and downtime)	§60.5555(a),(b)

A source must keep the following records:

Recordkeeping	
Records of hourly and total CO ₂ mass emissions calculations	§60.5560(d)-(g)
Records of malfunctions or downtime	§§60.7(b), 60.5560(a)
Records of performance evaluations	§§60.7(f), 60.5560(a)

Electronic Reporting

As part of an Agency-wide effort to facilitate reporting of environmental data and reports, the rule requires that owners and operators subject to this regulation must electronically submit quarterly emissions summary reports that include excess emissions and continuous monitoring systems performance data. Owners or operators submit these reports to the EPA using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool provided by the Clean Air Markets Division in the EPA Office of Atmospheric Programs.

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

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CEMS for CO ₂ or monitors for fuel flow rate, and unit operating time of the EGU.
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 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:

Agency Activities
Review notifications and reports, including quarterly emissions summary reports (includes excess emissions) required to be submitted by industry.
Audit facility records.

Agency Activities

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 CO₂ CEMS and the associated automatic data acquisition system are properly installed and operated. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly 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 three 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. 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, at the end of this document, in Table 1: Annual Respondent Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (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 883 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 standard(s) 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. Again, there are no capital/startup or operation and maintenance costs for this ICR.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$28,000.

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, at the end of this document, in Table 2: Average Annual EPA Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (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 32 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 32 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not	(D) Number of Existing Respondents That	(E) Number of Respondents

Number of Respondents					
			submit reports	Are Also New Respondents	(E=A+B+C-D)
1	0	32	0	0	32
2	0	32	0	0	32
3	0	32	0	0	32
Average	0	32	0	0	32

¹ 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 32.

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
Prepare/Submit Emissions Summary Report	32	1	0	32
Notification of construction	0	1	0	0
Notification of startup	0	1	0	0
			Total	32

The number of Total Annual Responses is 32.

The total annual labor costs are \$101,000.00 (rounded). Details regarding these estimates may be found below, at the end of this document, in Table 1: Annual Respondent Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (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 at the end of this document in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 883 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (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 28 hours per response.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 589 labor hours at a cost of \$28,000; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (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 the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The change in the burden and cost estimates occurred because these standards have been in effect for more than three years. The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This ICR, by in large, reflects the on-going burden and costs for existing facilities. This ICR also assumes that all existing respondents will spend up to 8 hours annually for review of the rule, and will continue to submit quarterly reports. There are no capital or operation and maintenance costs associated with these same standards.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 28 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-2018-0249. 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-2018-0249 and OMB Control Numbers 2060-0626 and 2060-0629 in any correspondence.

Part B of the Supporting Statement

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

Assumptions

^a We have assumed that there are approximately 37 units (12 combined cycle CT facilities and 25 simple cycle CT units) at 32 facilities. There no new sources anticipated over the next 3 years.

^b Assumes one-time burden of 30 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and managerial staff.

^c This ICR uses the following labor rates: Technical \$117.92 (\$56.15 + 110%); Managerial \$147.40 (\$70.19 + 110%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^d All recordkeeping burden is accounted for in the listed reporting activities.

^e 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 GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR part 60, subpart TTTT)

Burden Item	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year ^a	(E) Total Hours/ Year (C x D)	(F) Technica l Hours/ Year (C x D)	(G) Manageria l Hours/ Year (E x .05)	(H) Clerica l Hours/ Year (E x .10)	(I) Cost/ Year _b
Notification of construction	1	1	1	0	0	0	0	0	\$0
Notification of startup	1	1	1	0	0	0	0	0	\$0
Prepare/Submit Emissions Summary Report (Includes reporting of excess emissions & downtime)	4	4	16	32	512	512	26	51	\$27,992.83
TOTAL (rounded)^c							589		\$28,000

Assumptions

^a We have assumed that there are approximately 37 units (12 combined cycle CT facilities and 25 simple cycle CT units) at 32 facilities. There are no new sources anticipated over the next 3 years.

^b This cost is based on the average hourly labor rate as follows: Technical \$48.75 (GS-12, Step 1, \$30.47 + 60%); Managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$26.38 (GS-6, Step 3, \$16.49 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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 government employees.

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