

Appendix A-1
LABOR RATES

Contractor Rates [1]

2019 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits, Overhead & Profit</i>	<i>Total</i>
\$102.00	\$46.25	2.2	\$101.75

Respondent Rates [2]

2019 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits & Overhead</i>	<i>Total</i>
\$93.00	\$46.25	2	\$92.50

State/Local Agency Rates [3]

2019 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits & Overhead</i>	<i>Total</i>
\$66.00	\$33.09	2	\$66.17

EPA Rates [4]

2019 Hourly	<i>Hourly Wage Rate</i>	<i>Benefits</i>	<i>Total</i>
\$56.00	\$35.02	1.6	\$56.03

[1] Industry contractor rate based on mean hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2018; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in November 2019) Benefits and overhead assumed to total 100% of wages; profit margin assumed to be 10% on top of "loaded" total. See wage escalation calculations below.

[2] Respondent in-house rate based on mean hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2018; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in November 2019) Benefits and overhead assumed to total 100% of wages. See wage escalation calculations below.

[3] State/Local rates based on 25th percentile hourly wages for Environmental Engineers obtained from "Occupational Employment and Wages, May 2018; 17-2081 Environmental Engineers" U.S. Department of Labor, Bureau of Labor Statistics. (<http://www.bls.gov/oes/current/oes172081.htm> accessed in November 2019) Benefits and overhead assumed to total 100% of wages. See wage escalation calculations below.

[4] Federal Labor Cost obtained from U.S. Office of Personnel Management 2019 General Schedule

Universe of Respondents

Universe Estimates

Sources under EPA authority

# New exploration sources	0	see below - 0 represents the number of expected primary permits to be issued during ICR period
# Existing exploration sources	1	see below - 1 represents the number of existing permits at the start of the ICR period
# Exploration wells to be drilled	5	see below - the 1 existing source above is likely to drill 5 exploratory wells during ICR period
# New development/production sources	0	
# Existing sources	0	this refers to existing development/production sources
# New alternative energy sources	3	major source permits
# Existing alternative energy sources	4	
Sources under state/local authority		
# New exploration sources	0	
# New development/production sources	0	
# Existing sources	15	include two sources making minor permit mods
# Construction mod to existing sources	2	the two minor mods above require minor NSR permits as well (carried this number over from 2017 renewal)
# New alternative energy sources	5	major source permits
# Existing alternative energy sources	1	
Total Number of Sources	29	does not include # exploration wells (row 8) or modified existing sources (row 18) as this would be double counting
State/local agencies overseeing sources	7	see below
Total Number of Respondents	36	

New and existing oil/gas exploration sources - 2020 renewal

Under EPA authority

Alaska:

- 1 permit application for an exploration source will be submitted, and the permit will be issued prior to 10/1/2020; this is considered an existing source for this ICR. The permit will allow up to five exploratory wells over 2 years.

Eastern Gulf:

None

Other areas:

None

Under state/local authority

None

New and existing oil/gas development/production sources - 2020 renewal

Under EPA authority

None

Under state/local authority

South Coast Air Quality Management District:

There are 4 existing platforms that are expected to continue operating

Ventura County Air Pollution Control District:

Of the 4 existing platforms in Ventura County, 2 are in the process of shutting down and 2 are expected to continue operating

Santa Barbara County Air Pollution Control District:

Of the 15 platforms formerly in Santa Barbara County, 3 have shut down, 3 are in the process of shutting down, 3 that were "shut in" are expected to resume production, and 6 are expected to continue operating. These are treated as 9 existing sources for this ICR

New and existing alternative energy sources - 2020 renewal

Under EPA authority

Region 1:

- 3 offshore wind projects will have submitted their NOIs and major source construction/operation permit applications prior to 10/1/2020; these are considered existing sources for this ICR
- 3 additional offshore wind projects will submit their NOIs and major source construction/operation permit applications during the period covered by this ICR; these are considered new sources for this ICR

Region 2:

- 1 offshore wind project will submit its NOI and major source construction/operation permit application prior to 10/1/2020; this is considered an existing source for this ICR

Region 3:

None; Virginia, Maryland, and Delaware have received delegation of the OCS program

Regions 4, 9, and 10:

No permitting activity anticipated. Region 4 expects a meteorological buoy to be deployed in 2022/2023, but it will not require an OCS permit.

Under state/local authority

Maryland:

- 1 offshore wind project has been issued a minor source permit for a meteorological tower. It will submit its NOI and major source construction/operation permit applications during the period covered by this ICR; this is considered a new source for this ICR

Virginia:

- 1 offshore wind demonstration project (two turbines) will complete minor source permitting and construction before the period covered by this ICR; this is considered an existing source for this ICR
- 1 offshore wind project will submit its NOI and major source construction/operation permit application during the period covered by this ICR; this is considered a new source for this ICR

Delaware:

- 1 offshore wind project has been issued a minor source permit for a meteorological buoy. It will submit its NOI and major source construction/operation permit applications during the period covered by this ICR; this is considered a new source for this ICR

New Jersey:

- 2 offshore wind projects will submit their NOIs and major source construction/operation permit applications during the period covered by this ICR; these are considered new sources for this ICR

State and local agencies projected to have authority over sources

Santa Barbara County Air Pollution Control District

South Coast Air Quality Management District

Ventura County Air Pollution Control District

Maryland Department of Environment

Virginia Department of Environmental Quality

New Jersey Department of Environmental Protection

Delaware Department of Natural Resources and Environmental Control

San Luis Obispo Air Pollution Control District has received delegation of the OCS permit program, but is not anticipated to have any OCS sources

**EXHIBIT 1. NEW AND PREVIOUSLY PERMITTED EXPLORATION SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Read regulations ²	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA ²	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	0	1	0.00	30	\$2,790.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	0	1	0.00	50	\$4,650.00	293	\$29,886.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	0	1	0.00	25	\$2,325.00	146	\$14,892.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test ⁴	5	1	1.67	100	\$9,300.00	764	\$77,928.00	1,440	\$145,380.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁵	0	1	0.00	42	\$3,906.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁴	5	1	1.67	32	\$2,976.00	0	\$0.00	53	\$4,960.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	3.33				Burden	1,493	\$150,340.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications

**EXHIBIT 2. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Read regulations ²	3	1	1.00	5	\$465.00	0	\$0.00	5	\$465.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA ²	3	1	1.00	5	\$465.00	0	\$0.00	5	\$465.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	3	1	1.00	30	\$2,790.00	0	\$0.00	30	\$2,790.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	3	1	1.00	50	\$4,650.00	293	\$29,886.00	343	\$34,536.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	0	1	0.00	25	\$2,325.00	146	\$14,892.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁴	3	1	1.00	42	\$3,906.00	0	\$0.00	42	\$3,906.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁵	7	3	7.00	32	\$2,976.00	0	\$0.00	224	\$20,832.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	12.00				Burden	649	\$62,994.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications
2. Assumes all new permittees must perform these tasks
3. Assumes all new permits are major source permits because all permitting at this time is for construction/operation.
4. Assumes that all new major source permittees also incorporate operating permit requirements at the same time.
5. Assumes that all new and existing permittees must conduct recordkeeping and reporting during each year of the ICR period

**EXHIBIT 3. NEW DEVELOPMENT/PRODUCTION SOURCES UNDER EPA AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence ²	Capital Costs per Occurrence ³	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Read regulations	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct	0	1	0.00	30	\$2,790.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare preconstruction permit application	0	1	0.00	100	\$9,300.00	585	\$59,670.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test	0	1	0.00	100	\$9,300.00	764	\$77,928.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application	0	1	0.00	42	\$3,906.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁴	0	3	0.00	64	\$5,952.00	0	\$0.00	0	\$0.00	\$1,433.09	\$28,661.89	\$0.00	\$0.00
		Responses per Year**	0.00				Burden	0	\$0.00	\$1,433.09	\$28,661.89	\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR
2. Assumes O&M is 5 percent of capital costs
3. Capital costs calculated using the June 2019 final CEPCI index for process instruments (416.4) compared to the final December 1998 index (363.2) and applied to the 1998 estimate of \$25,000
4. Assumes that all permittees must conduct recordkeeping and reporting during each year of the ICR period

**This number is used in the summary (Exhibit 14)

**EXHIBIT 4. NEW EXPLORATION SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Read regulations	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with EPA, or State and local agency	0	1	0.00	5	\$465.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct and permit application	0	1	0.00	70	\$6,510.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform initial compliance test	0	1	0.00	100	\$9,300.00	748	\$76,296.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to local agency	0	3	0.00	64	\$5,952.00	0	\$0.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	0.00				Burden	0	\$0.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR

**EXHIBIT 5. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Read regulations ²	5	1	1.67	5	\$ 465.00	0	\$0.00	8	\$775.00	\$0.00	\$0.00	\$0.00	\$0.00
Consult with state/local agency ²	5	1	1.67	5	\$ 465.00	0	\$0.00	8	\$775.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare a NOI to construct ²	5	1	1.67	30	\$ 2,790.00	0	\$0.00	50	\$4,650.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major source permit application ³	5	1	1.67	50	\$ 4,650.00	293	\$29,886.00	572	\$57,560.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor source permit application ³	0	1	0.00	25	\$ 2,325.00	146	\$14,892.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare operating permit application ⁴	5	1	1.67	42	\$ 3,906.00	0	\$0.00	70	\$6,510.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to state/local agency ⁵	6	3	6.00	32	\$ 2,976.00	0	\$0.00	192	\$17,856.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	14.33				Burden	900	\$88,126.00			\$0.00	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except hours added for preparing permit applications
2. Assumes all new permittees must perform these tasks
3. Assumes all new permits are major source permits because all permitting at this time is for construction/operation.
4. Assumes that all new major source permittees also incorporate operating permit requirements at the same time
5. Assumes that all new and existing permittees must conduct recordkeeping and reporting during each year of the ICR period

**This number is used in the summary (Exhibit 14)

**EXHIBIT 6. EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER STATE/LOCAL AUTHORITY
RESPONDENTS' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Contractors Hours per Occurrence	Contractors Dollars per Occurrence	Total Hours per Year	Total Cost per Year	O&M Costs per Occurrence ²	Capital Costs per Occurrence	Total O&M Costs per Year	Total Capital Costs per Year
Labor Rates					\$93.00		\$102.00						
Prepare permit to operate application ³	9	1	3.00	42	\$3,906.00	0	\$0.00	126	\$11,718.00	\$0.00	\$0.00	\$0.00	\$0.00
Perform annual compliance test	15	3	15.00	100	\$9,300.00	764	\$77,928.00	12,960	\$1,308,420.00	\$0.00	\$0.00	\$0.00	\$0.00
Conduct record keeping and report data to EPA ⁴	15	3	15.00	64	\$1,209.00	0	\$0.00	960	\$18,135.00	\$1,433.09	\$0.00	\$21,496.42	\$0.00
Prepare a NOI to construct ⁵	2	1	0.67	30	\$2,790.00	0	\$0.00	20	\$1,860.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare minor modification permit application ⁵	2	1	0.67	50	\$4,650.00	293	\$29,886.00	229	\$23,024.00	\$0.00	\$0.00	\$0.00	\$0.00
Prepare major modification permit application	0	1	0.00	100	\$9,300.00	585	\$59,670.00	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
		Responses per Year**	34.33				Burden	14,295	\$1,363,157.00	\$1,433.09	\$0.00	\$21,496.42	\$0.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except that hours for minor preconstruction permit are half the major source level
2. O&M costs equal those calculated in Exhibit 3
3. Because these are 5-year permits, assumes that 60 percent of existing sources will renew their operating permits during the 3 years of the ICR period

**EXHIBIT 7. NEW EXPLORATION SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$66.00		
Consult with sources	0	1	0.00	5	\$330.00	0	\$0.00
Review NOI to construct	0	1	0.00	55	\$3,630.00	0	\$0.00
Review permit to operate application	0	1	0.00	40	\$2,640.00	0	\$0.00
Oversee initial compliance test	0	1	0.00	67	\$4,422.00	0	\$0.00
Conduct inspections	0	2	0.00	16	\$1,056.00	0	\$0.00
Review data reports	0	1	0.00	8	\$528.00	0	\$0.00
		Responses per year**	0.00		Burden	0	\$0.00

* Assumes hours per occurrence is the same as that in the 1998 ICR.

**EXHIBIT 8. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$66.00		
Consult with sources ²	5	1	1.67	5	\$330.00	8	\$550.00
Review NOI to construct and minor source permit application ³	0	1	0.00	55	\$3,630.00	0	\$0.00
Review NOI to construct and major source permit application ³	5	1	1.67	263	\$17,358.00	438	\$28,930.00
Review permit to operate application ⁴	5	1	1.67	40	\$2,640.00	67	\$4,400.00
Conduct inspections ⁵	6	3	6.00	16	\$1,056.00	96	\$6,336.00
Review data reports ⁵	6	3	6.00	8	\$528.00	48	\$3,168.00
		Responses per year**	17.00		Burden	657	\$43,384.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR for consultations, inspections and report reviews; hours for permit ap

**EXHIBIT 9. EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER STATE/LOCAL AUTHORITY
STATE/LOCAL AGENCIES' ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$66.00		
Oversee annual compliance test	15	3	15.00	67	\$4,422.00	1,005	\$66,330.00
Conduct inspections	15	12	60.00	16	\$1,056.00	960	\$63,360.00
Review permit to operate application ²	9	1	3.00	40	\$2,640.00	120	\$7,920.00
Review data reports	15	3	15.00	8	\$528.00	120	\$7,920.00
Review NOI to construct and permit application ³	2	1	0.67	35	\$2,310.00	23	\$1,540.00
		Responses per year**	93.67		Burden	2,228	\$147,070.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR.
2. Because these are 5-year permits, assumes that 60 percent of existing sources will renew their operating permits during the 3 years of the ICR period
3. Assumes 2 of the existing sources will undergo minor NSR preconstruction permitting for changes at their facilities.

**This number is used in the summary (Exhibit 14)

**EXHIBIT 10. NEW AND PREVIOUSLY PERMITTED EXPLORATION SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$56.00		
Consult with sources ²	0	1	0.00	5	\$280.00	0	\$0.00
Review NOI to construct and minor permit application ³	0	1	0.00	35	\$1,960.00	0	\$0.00
Review NOI to construct and major permit application ³	0	1	0.00	263	\$14,728.00	0	\$0.00
Review operating permit application ⁴	0	1	0.00	40	\$2,240.00	0	\$0.00
Oversee initial compliance test ⁵	5	1	1.67	67	\$3,752.00	112	\$6,253.33
Review data reports ⁵	5	1	1.67	8	\$448.00	13	\$746.67
					Burden	125	\$7,000.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR

**EXHIBIT 11. NEW AND PREVIOUSLY PERMITTED ALTERNATIVE ENERGY SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence ¹	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$56.00		
Consult with sources ²	3	1	1.00	5	\$280.00	5	\$280.00
Review NOI to construct and minor source permit application ³	0	1	0.00	35	\$1,960.00	0	\$0.00
Review NOI to construct and major source permit application ³	3	1	1.00	263	\$14,728.00	263	\$14,728.00
Review operating permit application ⁴	3	1	1.00	40	\$11,200.00	40	\$11,200.00
Review data reports ⁵	7	3	7.00	8	\$448.00	56	\$3,136.00
					Burden	364	\$29,344.00

1. Assumes hours per occurrence is the same as that in the 1998 ICR, except burden for review of a minor source revised to be consistent with other e

**EXHIBIT 12. NEW AND EXISTING DEVELOPMENT/PRODUCTION SOURCES UNDER EPA AUTHORITY
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Costs per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$56.00		
Consult with sources	0	1	0.00	5	\$280.00	0	\$0.00
Review NOI to construct and permit application	0	1	0.00	263	\$14,728.00	0	\$0.00
Review preconstruction permit application	0	1	0.00	100	\$5,600.00	0	\$0.00
Oversee initial compliance test	0	1	0.00	67	\$3,752.00	0	\$0.00
Review operating permit application	0	1	0.00	40	\$11,200.00	0	\$0.00
Review data reports	0	1	0.00	8	\$728.00	0	\$0.00
					Burden	0	\$0.00

* Assumes hours per occurrence is the same as that in the 1998 ICR.

**EXHIBIT 13. CONSISTENCY UPDATES AND OVERSEEING STATE/LOCAL ACTIVITIES
EPA'S ANNUAL BURDEN**

Collection Activities	Number of Respondents	Number of Occurrences for 3 years	Occurrences per year	Hours per Occurrence*	Cost per Occurrence	Total Hours per Year	Total Cost per Year
Labor Rate					\$56.00		
Annual Consistency Reviews	14	3	14.00	4	224.00	56	\$3,136.00
Major NOI/Regulatory Changes Review	2	1	0.67	150	8,400.00	100	\$5,600.00
Minor NOI/Regulatory Changes Review	7	1	2.33	40	2,240.00	93	\$5,226.67
					Burden	249	\$13,962.67

* Assumes hours per occurrence is the same as that in the 1998 ICR, except we have added concept of "minor" review

**EXHIBIT 14. OCS AIR REGULATIONS INFORMATION COLLECTION BURDEN
SUMMARY OF ANNUAL BURDENS AND COSTS**

	Responses	Respondent Hours	Respondent Costs	O&M Costs	Capital Costs	Agency Hours	Agency Costs
New and Previously Permitted Exploration Sources under EPA Authority (Exhibit 1)	3.3	1,493	\$150,340	\$0	\$0		
New and Previously Permitted Alternative Energy Sources under EPA Authority (Exhibit 2)	12.0	649	\$62,994	\$0	\$0		
New Development / Production Sources under EPA Authority (Exhibit 3)	0.0	0	\$0	\$0	\$0		
New Exploration Sources under State/Local Authority (Exhibit 4)	0.0	0	\$0	\$0	\$0		
New Alternative and Previously Permitted Energy Sources under State/Local Authority (Exhibit 5)	14.3	900	\$88,126	\$0	\$0		
Existing Development / Production Sources under State/Local Authority (Exhibit 6)	34.3	14,295	\$1,363,157	\$21,496	\$0		
Subtotal of Industry Burden (rounded)	64.0	17,337	\$1,664,617	\$21,496	\$0		
New Exploration Sources under State/Local Authority (Exhibit 7)	0.0	0	\$0				
New and Previously Permitted Alternative Energy Sources under State/Local Authority (Exhibit 8)	17.0	657	\$43,384				
Existing Development/ Production Sources under State/Local Authority (Exhibit 9)	93.7	2,228	\$147,070				
Subtotal of State/Local Burden (rounded)	111.0	2,886	\$190,454				
New and Previously Permitted Exploration Sources under EPA Authority (Exhibit 10)						125	\$7,000
New and Previously Permitted Alternative Energy Sources under EPA Authority (Exhibit 11)						364	\$29,344
New and Existing Development/ Production Sources under EPA Authority (Exhibit 12)						0	\$0
Consistency Updates (Exhibit 13)						249	\$13,963
Subtotal of EPA Burden						738	\$50,307
Total Annual Cost /Burden for the Outer Continental Shelf Air Regulations	175	20,223	\$1,855,071	\$21,496	\$0	738	\$50,307