**Supporting Statement A for Paperwork Reduction Act Submissions**

**30 CFR Part 550, Subpart C, Pollution Prevention and Control**

**OMB Control Number 1010-0057**

**Current Expiration Date: May 31, 2021**

**Terms of Clearance:** None

**General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, “Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

**A. Justification**

***1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.***

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. §1331 *et seq*. and 43 U.S.C. §1801 *et seq*.), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement.

Section 1332(6) states that “operations in the [O]uter Continental Shelf should be conducted in a safe manner by well-trained personnel using technology, precautions, and techniques sufficient to prevent or minimize… occurrences which may cause damage to the environment or to property, or endanger life or health.” Section 1334(a)(8) requires that regulations prescribed by the Secretary include provisions “for compliance with the national ambient air quality standards [NAAQS] pursuant to the Clean Air Act (42 U.S.C. § 7401 *et seq*.), to the extent that activities authorized under this subchapter [Act] significantly affect the air quality of any State.”

This authority and responsibility are among those delegated to the Bureau of Ocean Energy Management (BOEM). The regulations at 30 CFR 550, Subpart C, concern pollution prevention and control and are the subject of this collection. This request also covers the related Notice to Lessees and Operators (NTL), BOEM NTL No. 2020-N03 – 2021 OCS Emissions Inventory Western Gulf of Mexico and Adjacent to the North Slope Borough of the State of Alaska , that BOEM issues to clarify, supplement, or provide additional guidance on some aspects of our regulations. To view the NTL, please visit <https://www.boem.gov/guidance>.

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.***

In general, BOEM uses the information collected under subpart C to ensure that:

• there is no threat of serious, irreparable, or immediate damage to the marine environment caused by OCS oil and gas exploration activities;

• operations are conducted according to all applicable regulations, permit conditions and requirements, and in a safe and workmanlike manner; and

• OCS oil and gas activities are conducted in a manner that minimizes air pollution from the OCS in adjacent onshore areas and do not exceed required emission levels.

For the Gulf of Mexico and Alaska OCS Regions, this ICR addresses the following non-routine information collection. The U.S. Environmental Protection Agency (USEPA) promulgated national ambient air quality standards (NAAQS). OCSLA (Section 1334(a)(8)) requires BOEM to ensure compliance with the NAAQS to the extent that OCS oil and gas exploration, development, and production activities significantly impact the air quality of any State. Air quality-related information will be needed by BOEM, States, and USEPA to address any new or outstanding NAAQS and regional haze regulations. Therefore, affected respondents are required to collect and report relevant air pollutant emissions data for OCS activities in these regions.

BOEM prepares an Emissions Inventory every three years to help ensure that its regulations comply with section 5(a)(8) of OCS Lands Act, 43 U.S.C. § 1334(a)(8), and to implement the requirements at 30 CFR 550.303(k) and 550.304(g). BOEM is planning for a data collection period in calendar year 2021. These emission inventories also provide the States the essential tools needed to perform their State Implementation Plan demonstrations to the U.S. Environmental Protection Agency (USEPA), and they provide the operators essential data for their mandatory reporting of greenhouse gases to the USEPA.

In the past, respondent data was entered into BOEM’s OCS Emission Inventory, known as the Gulfwide Offshore Activities Data System (GOADS). The revision of this control number will include approval to use a new system for recording the data. BOEM has developed and plans to implement, the Air Quality System (AQS), a web-based solution that will allow operators to submit their facility activity data electronically, instantaneously calculate monthly and annual emissions, quality assure and control data, and generate reports, such as emission inventory reports, and data graphics including GIS maps to the operators and to BOEM.

The GOADS software is out of date and resides on a platform that BOEM is no longer able to utilize satisfactorily. Therefore, AQS would allow users to input their information directly into the system, which in turn will allow BOEM to access the data and create reports needed to assess oil and gas source impacts to the States. Unlike the GOADS software, AQS will make it easy for users to enter activity data, calculate emissions data in real-time for users, and leverage built-in validation features to quality check the calculations prior to submission.

In the Pacific, lessees are required to file Emergency Action Plans (EAPs) with their local air quality agencies in response to California air quality laws to protect public health during exceptional air pollution episodes. BOEM authorizes pre-approval to postpone certain testing during air pollution emergency episodes provided respondents submit to BOEM a copy of their EAP when submitted to the local air agencies. We review these EAPs prior to the event of an air pollution episode to ensure that abatement measures described therein do not jeopardize safe operations.

***3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.***

Currently, all information is submitted electronically. For previous air quality-related collection, BOEM provided respondents with the GOADS software, which is being replace upon approval of this OMB control number with the AQS. Therefore, all emissions inventorying reporting are accomplished electronically.

***4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.***

In the area of air quality, authority to regulate Gulf of Mexico OCS air emissions is split between the DOI and the USEPA. This fragmented process is a result of the 1990 amendments to the Clean Air Act (Pub. L. 101-549). Specifically, section 801 gives USEPA the authority to regulate OCS air emissions for all OCS areas except the area in the Gulf of Mexico west of 87º 30’ West Longitude. For this area, authority to regulate air emissions from OCS facilities remains with the Secretary of the Interior. These regulations are effective in avoiding duplication in Federal regulations and reporting. Similar information is not available because the information is unique for each emission source and data and information cannot be obtained elsewhere.

Congress in the Consolidated Appropriations Act 2012 (PL 112-74) mandated that BOEM regulate air quality impacts from activities on the OCS adjacent to the North Slope Borough of the State of Alaska.

***5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.***

This collection of information could have a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. The hour burden on any small entity subject to these regulations cannot be reduced beyond current levels without impairing the agency’s ability to comply with its statutory mandates.

***6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

If BOEM did not collect the information, we could not carry out the mandate of the OCS Lands Act to ensure safe and environmentally sound operations in the OCS. We could not determine if operations comply with standards to minimize air pollution of the OCS and adjacent onshore areas. The information collected is unique to each facility. With the exception of the information discussed in item A.7, the frequency is generally on occasion, so that a lesser frequency is not applicable.

***7. Explain any special circumstances that would cause an information collection to be conducted in a manner:***

***(a) requiring respondents to report information to the agency more often than quarterly;***

When required, monthly reporting is necessary to continuously monitor air emissions and record meteorological measurements from selected OCS sites. This information is not routinely collected from all lessees and operators, but only when conditions or circumstances warrant or for special studies that are mandated.

***(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***

Not applicable in this collection.

***(c) requiring respondents to submit more than an original and two copies of any document;***

Not applicable in this collection.

***(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;***

Not applicable in this collection.

***(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***

Not applicable in this collection.

***(f) requiring the use of statistical data classification that has been reviewed and approved by OMB;***

Not applicable in this collection.

***(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***

This collection does not include a pledge of confidentiality not supported by statute or regulation.

***(h) requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.***

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

***8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.***

***Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***

As required in 5 CFR 1320.8(d), BOEM published a 60-day review and comment notice in the *Federal Register* on August 10, 2020, (85 FR 48261). Also, 30 CFR 550.199 explains that BOEM will accept comments at any time on the information collection burden of our 30 CFR 550 regulations. We display the OMB control number and provide the address for sending comments to BOEM.

During the comment period, BOEM provided information and training on the new software to operators through a workshop format. During the workshop, one of the participants provided feedback on ways to improve the new system. Most of the input received was on technical aspects of the software and were addressed with BOEM’s software contractor.

During the 60-day public comment period and following the workshop, BOEM received a formal comment letter from the Offshore Operators Committee (OOC). The burden estimates in Section A.12 reflect their input.

The OOC commented on the burden estimates and the functionality of the new Air Quality System. Based on OOC’s input, BOEM updated the system to address the system’s technical issues. BOEM also modified the burden estimates based on the OOC comment letter. The OOC’s comments and BOEM’s responses are summarized below.

*Comment*: Regarding the reporting of non-platform data, OOC stated “Historically, collection of non-platform air emission data was the responsibility of BOEM. By shifting the responsibility of collecting and reporting non-platform source data to operators, BOEM is increasing the burden of reporting. For example, the Burden Table included in the Notice of Information Collection estimates 44 hours per facility to collect and report emissions data. As described in the attached comments, we estimate that for drilling rigs alone (exclusive of platforms and other support vessels) the estimated reporting burden is 117 hours per facility.”

*BOEM Response:* BOEM is requiring emissions reporting from “facilities,” as defined in its regulations implementing its authority under the Outer Continental Shelf Lands Act (OCSLA). The projected emissions from these same sources are reported in the plans review process, which is documented in the Air Quality Spreadsheets (BOEM-0138 and BOEM-0139) and fall under OMB Control Number 1010-0151.

BOEM would require the operator to submit activity or emissions data for all facilities corresponding to the definition of facility in BOEM’s regulation and the recently-updated plan review process, which would include drilling rig emissions only when the drilling unit is attached to the seabed and construction vessel emissions only when the vessel is conducting the construction.

Upon further review, BOEM acknowledges that there will be additional burden hours for reporting other facility sources (drilling rigs and construction vessels). However, BOEM will simplify the reporting of drilling rig data in OCS AQS by including a drilling rig look up table for horsepower ratings, therefore only requiring the operator to input fuel throughput and total hours of drilling.

Moreover, reporting information for construction vessels will not be an altogether new burden for certain operators since, during the plan review process, some construction vessels are subject to a standard condition of approval which requires fuel throughput compliance verification to be sent to BSEE. The burden for these vessels fuel throughput reporting is included in OMB Control Number 1010-0151. The current burden of 44 hours per facility was for platform sources and will remain the same for the first year for these sources (with a chance of decreasing in three years due to the learning curve of a new reporting tool). Assuming one drilling rig and one construction vessel per facility, BOEM believes that an additional 20 hours (10 hours per source) should be included. Therefore, BOEM is increasing the burdens to 64 hours per facility.

*Comment:* It appears to OOC that BOEM is requiring the reporting of data from drilling rigs and construction vessels underway within 25 miles of a facility. It is OOC’s position that drilling rigs and vessels underway do not meet the definition of “facility” in 30 CFR 550.302 because when underway, the rig or vessel is not attached to the seabed. Therefore, according to OOC, the rig or vessel does not fall under BOEM’s OCS Lands Act (OCSLA) authority.

*BOEM Response:* BOEM is only requiring the reporting of data from facilities as defined in its regulations, which include drilling rigs when attached to the seabed and construction vessels only when construction is being conducted. BOEM will not require the reporting of emissions when these sources are within 25 miles of a facility.

*Comment:* Regarding potential changes to reporting frequencies, OOC stated “It is unclear if the 3-year reporting frequency will change with the implementation of AQS. For example, will operators be required to submit monthly data on an ongoing basis? If that is the case, then the estimated burden will increase substantially, at least by a factor of 3 because reporting will no longer be required every 3 years. If this is the intent of the agency, then a new burden estimate must be completed prior to implementation of the new system.”

*BOEM Response:* BOEM intends to collect emissions data roughly every three years. However, because of the delay in development of OCS AQS, BOEM is off-cycle as our last effort was four years ago. BOEM is planning for the next reporting cycle to be 2023 in order to align with the Environmental Protection Agency’s emissions reporting cycle.

*Comment:* Regarding complexities of reporting flare information, OOC stated that the complexity of how flare emissions data is constructed in AQS raises concerns.

*BOEM’s Response:* Operators should report one flare source per flare using their flare design specifications from the manufacturer for the smoke condition and total volume flared (including pilot light). BOEM will clarify this in the updated AQS User’s Manual. This is consistent with the past 2017 emissions inventory collection and does not affect the burden hours.

*Comment:* Regarding Oil and Gas Operations Report reconciliation, OOC stated that Oil and Gas Operations Reports should not be utilized for emissions calculations or emissions data quality assurance/quality control because the accounting standards and requirements applicable to the reports do not yield technically correct emissions estimates.

*BOEM’s Response:* Oil and Gas Operations Reports (OGOR) were mentioned in the AQS training guide, while the tool was still under development, since BOEM is uploading these reports into AQS to reconcile volumes vented and flared. It was a reminder to operators to ensure consistency in reporting, not an indication that report data was to be used in calculating or reporting emissions in OCS AQS.

*Comment:* Regarding functionality of QA/QC of data prior to submittal, OOC believes that the functionality built into AQS could be streamlined to improve system effectiveness and reduce burden.

*BOEM’s Response:* BOEM has updated the QA/QC function in OCS AQS to support the requested performance improvements. Specifically, when a user selects the option to submit an emissions inventory, a QA/QC check is automatically executed against that inventory. If any QA/QC issues are detected, the user is notified and is provided with a spreadsheet detailing the specific issues that were identified by the QA/QC check. This spreadsheet can be downloaded from OCS AQS. The User’s Manual is being updated to reflect this QA/QC change.

*Comment:* Regarding confidentiality of data and defined user roles, OOC thinks BOEM should clarify and ensure controls are integrated into AQS so that data remains confidential and available only to the organization reporting the data.

*BOEM’s Response:* BOEM agrees that only an operators’ designated representative, alternate designated representative, or agent will be able to access data for the assigned facility (facilities) for the inventory reporting year. It should be noted that the operators will be able to access the results of the final historic inventory for all facilities as BOEM has always made this data publicly available and plans to continue doing so. The publicly-available results of the inventory will not include any confidential business information.

*Comment:* Regarding file naming conventions associated with import/export, OOC suggested enhancements to AQS to allow users to define file names during data import and export to reduce burden and improve system functionality.

*BOEM’s Response:* All supported browsers (Firefox, Chrome, Edge) provide this option for the user. By default, this option is usually set to the Downloads folder; however, there is an option to have the application ask where to save file, which then allows the user to rename the file during the operation. The browser options are beyond the control of the OCS AQS software. The updated User’s Manual will provide additional guidance for users.

*Comment:* Regarding 2021 initial inventory and transfer of GOADS data, OOC said it is unclear what data from 2017 GOADS (the last reporting year using GOADS) will be transferred for the initial 2021 AQS inventory. Historical activity data does not need to be included, but all historical descriptive, static data should be transferred over to minimize company burden to populate.

*BOEM’s Response:* As with GOADS efforts for platform sources, operators will receive all static data from the past inventory effort (in this case 2017) which includes complex/structure IDs and emissions sources data. As commented, activity data such as throughput and hours of operation are not carried forward as this information is expected to change year to year. The company will still have to review the static data to ensure its accuracy before entering in any activity data.

*Comment:* Regarding clarification on reporting storage tank emissions, OOC stated “Reporting of data to estimate storage tank emissions is appropriate and necessary. However, changes to the types of storage data and the calculations within AQS would reduce burden.”

*BOEM’s Response:* As with previous years using GOADS, BOEM will continue to require the reporting of crude oil storage tanks, not other types of storage tanks, which is also consistent with the reporting requirements in the plan review process on the Air Quality Spreadsheets.

In addition to those comments, OOC also pointed out several technical errors with AQS and issues needing further clarification. BOEM appreciates the technical comments and observations, and is working with the contractors to update the tool and User’s Manual, as necessary.

***9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.***

We will not provide payment or gifts to respondents in this collection.

***10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.***

BOEM will protect proprietary information according to 30 CFR 550.197, “Data and information to be made available to the public or for limited inspection,” and the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2).

***11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.***

The collection does not include sensitive or private questions.

***12. Provide estimates of the hour burden of the collection of information. The statement should:***

***(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.***

***(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.***

Potential respondents include Federal oil, gas, and sulphur lessees and/or operators and states. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responses are mandatory and are submitted on occasion. We estimate a total reporting and recordkeeping annual burden of 51,080 hours. Refer to the following table for a breakdown of the burden hours.

**BURDEN BREAKDOWN**

| **Citation**  **30 CFR 550**  **Subpart C**  **and related NTL(s)** | **Reporting and Recordkeeping**  **Requirement** | **Hour Burden** | **Average No. of Annual Responses** | **Annual Burden Hours** |
| --- | --- | --- | --- | --- |
|
| **Facilities described in new or revised EP or DPP** | | | | |
| 303; 304(a), (f) | Submit, modify, or revise Exploration Plans and Development and Production Plans; submit information required under 30 CFR Part 550, Subpart B. | Burden covered under 1010-0151 (30 CFR Part 550, Subpart B). | | 0 |
| 303(k); 304(a), (g); NTL | Collect and report (in manner specified) air quality emissions related data (such as facility, equipment, fuel usage, and other activity information) during each specified calendar year for input into BOEM’s impacts assessments, and State and regional planning organizations’ modeling through specified software. (NTL OCS Emissions Inventory) | **64 hrs. per facility** | 794 facilities | **50,816** |
| 303(l); 304(h) | Collect and submit (in manner specified) meteoro­logical data (not routinely collected); emission data for existing facilities to a State. | 8 | 1 submission | 8 |
| **Subtotal** | | | **795 responses** | **50,824**  **hours** |
| **Existing Facilities** | | | | |
| 304(a), (f) | Affected State may submit request, with supporting information to BOEM, for basic emission data from existing facilities to update State’s emission inventory. | 16 | 5 requests | 80 |
| 304(e)(2) | Submit compliance schedule for application of best available control technology (BACT). | 40 | 1 schedule | 40 |
| 304(e)(2) | Apply for suspension of operations. | Burden covered under BSEE 1014-0022 (30 CFR 250.174). | | 0 |
| 304(f) | Submit information to demonstrate that exempt facility is not significantly affecting air quality of onshore area of a State. Submit additional information to determine if controls are required. | 16 | 1 submission | 16 |
| **Subtotal** | | | **7 responses** | **136 hours** |
| **General** | | | | |
| 303-304 | Departure and alternative compliance (as cited in 550.142) requests from 303 and 304 not specifically covered elsewhere in subpart C regulations. | 24 | 5 requests | 120 |
| **Subtotal** | | | **5 responses** | **120 hours** |
| **Total Burden** | | | **807**  **Responses** | **51,080**  **Hours** |

***(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “annual Cost to the Federal Government.”***

The average respondent cost is $62/hour. This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area. See BLS\* website: https://www.bls.gov/oes/current/oes\_26420.htm.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Position** | **Hourly Pay rate ($/hour estimate)** | **Hourly rate including benefits (1.4\*\* x $/hour)** | **Percent of time spent on collection** | **Weighted Average ($/hour rounded)** |
| Secretaries and Administrative Assistants  (43-6014) | $19 | $27 | 15% | $4 |
| Regulatory\*\*\*  (11-0000) | $61 | $85 | 15% | $13 |
| Air Quality Specialists^  (19-2041) | $45 | $63 | 65% | $41 |
| Supervisory^  (19-2041) | $45 | $63 | 5% | $3 |
| **Weighted Average ($/hour)** | | | | **$61** |

\* Note that this BLS source reflects their last update from May 2016.

\*\* A multiplier of 1.4 (as implied by BLS news release USDL 20-1736, September 17, 2020; https://www.bls.gov/news.release/ecec.nr0.htm) was added for benefits.

\*\*\* Management BLS occupation.

^ Environmental scientists BLS occupation.

Based on a cost factor of $61 per hour, we estimate the hour burden as a dollar equivalent is $2,182,400 ($61 x 51,080hours = $3,115,880).

***13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in Item 12).***

***(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.***

***(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day* *pre-OMB* *submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.***

***(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.***

We have not identified any non-hour paperwork cost burdens for this collection of information.

***14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.***

The average government cost is $80/hour. This cost is broken out in the below table using the Office of Personnel Management pay schedule for the Rest of the United States (consisting of the portions of the lower 48 United States not located within another locality pay area).

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Position** | **Grade** | **Hourly Pay rate ($/hour estimate)** | **Hourly rate including benefits (1.6\* x $/hour)** | **Percent of time spent on collection** | **Weighted Average ($/hour)** |
| Meteorologist/Physical Scientist | GS-13/9 | $55 | $88 | 55% | $48 |
| Physical Scientist | GS-11/10 | $40 | $64 | 40% | $26 |
| Supv. Physical Scientist | GS-15/5 | $71 | $114 | 5% | $6 |
| **Weighted Average ($/hour)** | | | | | **$80** |

\*A multiplier of 1.6 (as implied by BLS news release USDL 20-1736, September 17, 2020; https://www.bls.gov/news.release/ecec.nr0.htm) was added for benefits.

To analyze and review the information respondents submit for subpart C, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by respondents. Based on a cost factor of $80 per hour, the total the cost to the Government is $2,043,200. (51,080hours x 0.5 = 25,540 (rounded) hours x $80 = $2,043,200).

***15. Explain the reasons for any program changes or adjustments in hour or cost burden.***

The current OMB inventory includes 35,200 annual burden hours and 807 responses for the collection of information under this control number.

We estimate the annual burden for this collection to be 51,080 hours. Due to industry feedback, we estimate an increased burden of 20 hours per facility to account for an additional drilling rig and a construction vessel per facility. Therefore, this increases the annual burden hours from 35,200 to 51,080, which is an increase of 15,880 annual burden hours.

There are no non-hour cost burdens for this collection.

***16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions***

We will not tabulate and publish the individual responses. We will make the information reported under §§ 550.303(k), 550.304(a), and 550.304(g) available to the States for use in preparing their State Implementation Plans for ozone and regional haze models.

***17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.***

BOEM will display the OMB control number and approved expiration date.

***18. Explain each exception to the topics of the certification statement identified in, “Certification for Paperwork Reduction Act Submission.”***

There are no exceptions to the certification statement.