

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Renewal), EPA ICR Number 1086.12, OMB Control Number 2060-0120.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Onshore Natural Gas Processing Plants (40 CFR Part 60 Subpart KKK) were proposed on January 20, 1984, promulgated on June 24, 1985, and amended on both October 17, 2000 and August 16, 2012. These regulations apply to Volatile Organic Compound (VOC) emissions at the following types of existing facilities located at onshore natural gas processing plants: compressors in equipment leaks of VOC service or in wet gas service, and the groups of all equipment (except compressors) within a process unit. This information is being collected to assure compliance with 40 CFR Part 60, Subpart KKK.

The New Source Performance Standards for Onshore Natural Gas Processing Plants (40 CFR Part 60 Subpart LLL) were proposed on January 20, 1984, promulgated on October 1, 1985, and amended on both October 17, 2000 and August 16, 2012. These regulations apply to sulfur dioxide (SO₂) emissions at the following types of existing facilities located at onshore natural gas processing plants: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. The provisions of Subpart LLL do not apply to sweetening facilities that produce acid gas that is completely re-injected into oil or gas bearing geologic strata or that is otherwise not released to the atmosphere, or to affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide in the acid gas, expressed as sulfur. This information is being collected to assure compliance with 40 CFR Part 60, Subpart LLL.

This ICR accounts for the burden of existing facilities that have not been modified and are required to report under Subparts KKK and LLL. On August 16, 2012, EPA issued a new NSPS rule at Subpart OOOO addressing new and revised requirements for natural gas processing facilities, that are either new or modified sources after August 23, 2011 subject to Subparts KKK and LLL, and which began reporting under 40 CFR 60, Subpart OOOO. On June 3, 2016, EPA issued a new NSPS rule at Subpart OOOOa addressing new and revised requirements for natural gas processing facilities, that are either new or modified sources after August 2, 2016, subject to Subparts KKK and LLL, which will now report under 40 CFR 60, Subpart OOOOa. Although Subparts OOOO/OOOOa addresses other portions of the oil and gas sector, some of which have not been regulated before, the burden associated with these other rule requirements are not specifically addressed in this ICR.

In general, all NSPS standards require initial notifications, performance tests, and

periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

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

The “Affected Public” applies to owners and operators of onshore natural gas processing plants. The “burden” to the Affected Public may be found at the end of this document in Tables 1a: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 1b: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal). The burden to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The burden to the Federal Government can be found at the end of this document in Tables 2a: Average Annual EPA Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 2b: Average Annual EPA Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal). All natural gas processing plants subject to these standards are privately-owned, for-profit businesses. We assume that they will all respond to all EPA inquiries.

Over the next three years, approximately 345 respondents per year will be subject to Subpart KKK and approximately 17 respondents per year will be subject to Subpart LLL. Any new or modified sources will become subject to NSPS Subpart OOOOa. These estimates reflect a reduction in the number of respondents subject to Subparts KKK and LLL because they became subject to NSPS OOOO/OOOOa due to constructing new, modified, or reconstructed sources.

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 demonstrated adequately.
(Section 111(a)(l)).

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, VOC and SO₂ emissions from onshore natural gas processing plants 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, Subparts KKK and LLL.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or its delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions,

identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subparts KKK and LLL.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (85 FR 28003) on May 12, 2020. 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. A search of the Agency's ECHO database of sources subject to NSPS Subpart LLL requirements found 20 active facilities with a NAICS code of 211130 (natural gas extraction), an EIS ID, and reporting SO₂ emissions. Based on this information, the Agency has revised the estimate of the average number of respondents subject to NSPS Subpart LLL over the three-year period covered by this ICR to 17, which represents a decrease of 41 from the previous ICR. This estimate is based on the assumption that an average of 3 respondents per year currently reporting under NSPS Subpart LLL will undergo reconstruction or modification and begin reporting under NSPS Subpart OOOOa in the next three years. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

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 GPA Midstream Association, at (918) 493-3872, and the American Petroleum Institute, at (202) 682-8000.

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 onshore natural gas processing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 1321, which corresponds to the North American Industry Classification System (NAICS) 211130 for Natural Gas Extraction.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Onshore

Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK and LLL) (Renewal).

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	§60.7(a)(1)
Notification of actual startup date	§60.7(a)(3)
Notification of modification	§60.7(a)(4)

Reports	
Semiannual reports of excess emissions	§60.7(c)
Performance test results	§60.8(a), §60.636(a), §60.487(e)
Semiannual reports (Subpart KKK)	§§60.636(a)-(c), §60.487(a)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms (Subpart LLL)	§60.647(b)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions of affected facilities; malfunctions of control devices; and periods where the continuous monitoring system is inoperative.	§60.7(b)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems.	§60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect (Subpart KKK).	§60.632(a), §§60.482-10(l)(1)-(2)
Keep records of inspections of closed vent systems during which no leaks are detected (Subpart KKK).	§60.632(a), §§60.482-10(l)(4)-(5)
Perform attachment of identification numbers to leaking equipment (Subpart KKK).	§60.635(a), §60.635(b)(1), §60.486(b)(1)
Keep records of leak detection and repair for two years (Subpart KKK).	§60.632(a), §60.486(c), §60.635(a), §60.635(b)

Recordkeeping	
	(2), §60.482-10(l)(3)
Keep records of design requirements for and operation of closed vent systems and control devices (Subpart KKK).	§60.635(a), §60.486(d)
Keep records listing all equipment subject to the standard (Subpart KKK)	§60.635(a), §60.486(e)
Keep records of compliance tests (Subpart KKK).	§60.635(a), §60.486(e) (4)
Keep records of valves designated as unsafe or difficult to monitor (Subpart KKK).	§60.635(a), §60.486(f)
Keep records of design criterion that indicate failure (Subpart KKK).	§60.635(a), §60.486(h)
Keep records of parts not in VOC service or otherwise exempt (Subpart KKK).	§§60.635(a), (c), §60.486(j)
Keep records of calculations and measurements (Subpart LLL).	§60.647(a)
Facilities that choose to comply with §60.646(e) shall keep, for the life of the facility, records demonstrating that the facility design capacity is less than 150 long tons per day (LT/D) of hydrogen sulfide expressed as sulfur (Subpart LLL).	§60.647(d)

Electronic Reporting

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

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate temperature sensors, sulfur emission rate monitoring systems, and pressure relief device(s) in gas/vapor service for VOC and SO ₂ control devices.
Perform initial performance test, Reference Methods 1, 2, 6, 15, 15A, 16, and ASTM Method D86-78, 82, 90, 95, or 96 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

Respondent Activities
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

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two

years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of 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 at the end of this document in Tables 1a: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 1b: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the subparts 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 67,500 hours (Total Labor Hours from Tables 1a and 1b). These hours are based on Agency studies and background documents from the development of the regulation, 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	\$148.45 (\$70.69 + 110%)
Technical	\$121.46 (\$57.84 + 110%)
Clerical	\$60.23 (\$28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, “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 type of industry costs associated with the information collection activities in the subject standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ^b	(G) Total O&M, (E X F) ^c
SO ₂ CEM, control outlet (only for Subpart LLL) ^a	\$73,000	0	\$0	\$17,100	4	\$68,400

^a Costs reflect installation and maintenance of an in-situ SO₂ CEM after the control device and assume installation occurred during the construction of the facility.

^b We expect 4 existing facilities to have annual O&M costs for monitoring under 40 CFR 60, Subpart LLL.

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$68,400. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$68,400. These are the O&M

recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of these 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 \$330,000.

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

Managerial	\$68.37 (GS-13, Step 5, \$42.73 + 60%)
Technical	\$50.72 (GS-12, Step 1, \$31.70 + 60%)
Clerical	\$27.46 (GS-6, Step 3, \$17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 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 at the end of this document in Tables 2a: Average Annual EPA Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 2b: Average Annual EPA Burden and Costs – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (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 362 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 362 per year.

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

Number of Respondents		

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of Existing Respondents that would now report under Subpart OOOOa ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports ^b	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E= B+C-A-D)
Subpart KKK					
1	27	399	0	0	372
2	27	372	0	0	345
3	27	345	0	0	318
Average	27	372	0	0	345
Subpart LLL					
1	3	20	3	0	20
2	3	17	3	0	17
3	3	14	3	0	14
Average	3	17	3	0	17
Total ^c					362

^a We expect 27 of the existing facilities subject to Subpart KKK to undergo modifications in each year, which would indicate these facilities would report under Subpart OOOOa over the next 3 years and no longer report under Subpart KKK. For Subpart LLL, we expect three facilities to perform a modification and report under Subpart OOOOa each year over the next three years.

^b Affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas, expressed as sulfur, have no reporting requirements pursuant to Subpart LLL. Three respondents have sources capacities below this threshold.

^c This is the total average of existing respondents subject to both Subparts KKK and LLL.

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 362.

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
Subpart KKK				
Semiannual Reports	345	2		690
Subtotal for Subpart KKK				690
Subpart LLL				
Semiannual Report	17	2		34
Subtotal for Subpart LLL				34
			Total	724

The total number of Annual Responses is 724.

The total annual labor costs are \$6,930,000 for Subpart KKK and \$989,000 for Subpart LLL. Details regarding these estimates may be found at the end of this document in both Table 1a: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (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 in Tables 1a, 1b, 2a, and 2b at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 59,100 hours for Subpart KKK and 8,430 hours for Subpart LLL. Details regarding these estimates may be found at the end of this document in Tables 1a: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 1b: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (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 93 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$68,400. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 6,350 labor hours at a cost of \$314,000 for Subpart KKK and 313 labor hours at a cost of \$15,500 for Subpart LLL; see Tables 2a: Average Annual EPA Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 2b: Average Annual EPA Burden and Costs – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60 Subpart LLL) (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 decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred because the number of respondents subject to these requirements has decreased as those respondents modify their sources and become subject to another NSPS standard. As sources subject to NSPS Subparts KKK and LLL modify, they become subject to NSPS Subpart OOOOa and cease being subject to NSPS Subparts KKK and LLL. There is also a decrease in the estimated number of respondents subject to NSPS Subpart LLL. This is due to a re-examination of the Agency's ECHO database of sources subject to Subpart LLL with a NAICS code of 211130 (natural gas extraction) and reporting SO₂ emissions.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 93 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-2013-0316. 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-2013-0316 and OMB Control Number 2060-0120 in any correspondence.

Part B of the Supporting Statement

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

Table 1a: Annual Respondent Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK)

Burden Item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (AxB)	(D) Respondent s per year^a	(E) Technical person- hours per year (Cx D)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	345	345	17	35	\$46,542.40
B. Required activities								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of modification	8	1	8	0	0	0	0	\$0
Notification of anticipated startup ^c	2	1	2	0	0	0	0	\$0
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of electing to comply with alternative standards for valves ^c	8	1	8	0	0	0	0	\$0
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Affirmative defense	30	1	30	0	0	0	0	\$0

Semiannual reports ^d	8	2	16	345	5,520	276	552	\$744,678.36
C. Create Information								
Initial performance test ^c	N/A							
D. Gather existing information	N/A							
E. Write report	See 3B							
Reporting Subtotal					6,745			\$791,221
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4C							
B. Plan activities	See 4C							
C. Implement activities	See 3E							
Filing and maintaining records ^e	80	1	80	345	27,600	1380	2,760	\$3,723,391.80
Startup, shutdown, or malfunction	80	1	80	0	0	0	0	\$0
Recalibrate monitors	4	12	48	345	16,560	828	1,656	\$2,234,035.08
Method 21 performance evaluation	2	2	4	345	1,380	69	138	\$186,169.59
D. Develop record system	See 4C							
E. Time to enter information	See 4C							
F. Train personnel	See 4C							
G. Audits	N/A							
Recordkeeping Subtotal					52,371			\$6,143,596
Total Labor Burden and Costs (Rounded) ^f					59,100			\$6,930,000

Total Capital and O&M Costs (Rounded) ^f									\$0
Grand Total (Rounded) ^f						59,100			\$6,930,000

Assumptions:

^a We have assumed that the average number of existing respondents that will be subject to Subpart KKK will be 345. This estimated average accounts for modified facilities after August 23, 2011 subject to Subpart KKK that will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

^b This ICR uses the following labor rates: \$148.45 per hour for Executive, Administrative, and Managerial labor; \$121.46 per hour for Technical labor, and \$60.23 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, “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.

^c New respondents will be subject to 40 CFR Part 60, Subpart OOOOa.

^d We have assumed that each existing respondent will take 8 hours, two times per year to write semiannual reports.

^e We have assumed that each existing respondent will take 80 hours to file and maintain records.

^fTotals are rounded to three significant figures. Figures may not add exactly due to rounding.

Table 1b: Annual Respondent Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL)

Burden Item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (AxB)	(D) Respondents per year^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	17	17	0.9	1.7	\$2,293.39
B. Required activities								
Initial performance test ^c	60	1	60	0	0	0	0	\$0
Repeat performance test	60	0.2	12	0	0	0	0	\$0
Demonstration of CEMS	80	0.2	16	0	0	0	0	\$0
Repeat Demonstration of CEMS	80	0.2	16	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of modification ^c	2	1	2	0	0	0	0	\$0
Notification of anticipated	2	1	2	0	0	0	0	\$0

startup ^c								
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration ^c	2	1	2	0	0	0	0	\$0
CMS demonstration	See 3B							
Semiannual report ^d	40	2	80	17	1,360	68	136	\$183,471.48
Reporting Subtotal					1,584			\$185,765
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system ^e	40	1	40	0	0	0	0	\$0
E. Time to enter information								
Records of startup, shutdown, or malfunction	1.5	12	18	0	0	0	0	\$0
Records of continuous recording	0.5	700	350	17	5,950	298	595	\$802,687.73
Records of capacity data	2	1	2	3	6	0.3	0.6	\$809.43
F. Train personnel	N/A							
G. Audits	N/A							
Recordkeeping Subtotal					6,849			\$803,497
Total Labor Burden and Costs (Rounded) ^f					8,430			\$989,000

Total Capital and O&M Costs (Rounded) ^f									\$68,400
Grand Total (Rounded) ^f								8,430	\$1,060,000

Assumptions:

^a We have assumed that the average number of existing respondents that will be subject to subpart LLL will be 17. This estimated average accounts for modified facilities after August 2, 2016 subject to Subpart LLL that will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

^b This ICR uses the following labor rates: \$148.45 per hour for Executive, Administrative, and Managerial labor; \$121.46 per hour for Technical labor, and \$60.23 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, “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.

^c New respondents will be subject to 40 CFR Part 60, Subpart OOOOa.

^d We have assumed that each existing respondent will take 40 hours, two times per year to write semiannual reports.

^e We have assumed that each existing respondent will take 40 hours to develop record system. New respondents will be subject to 40 CFR Part 60, Subpart OOOOa recordkeeping requirements. However, Subpart LLL sources that have modified would need to track capacity data during the year it modified.

^f Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2a: Average Annual EPA Burden and Cost - NSPS for Onshore Natural Gas Production (40 CFR Part 60, Subpart KKK) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost ^b
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Review notification of modification ^c	2	1	2	0	0	0	0	\$0
Review notification of anticipated startup ^c	2	1	2	0	0	0	0	\$0
Review notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of demonstration of CEMS ^c	2	1	2	0	0	0	0	\$0
Review initial CEMS demonstration report ^c	2	1	2	0	0	0	0	\$0
Review notification of performance test ^c	2	1	2	0	0	0	0	\$0
Review results of performance test ^c	2	1	2	0	0	0	0	\$0
Review semiannual reports ^d	8	2	16	345	5,520	276	552	\$314,002.44
TOTAL (Rounded) ^e						6,350		\$314,000

Assumptions:

- ^a We have assumed that the average number of existing respondents that will be subject to Subpart KKK will be 345. This estimated average accounts for modified facilities after August 23, 2011 subject to Subpart KKK will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.
- ^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$68.37 (GS-13, Step 5, $\$42.73 \times 1.6$), Technical rate of \$50.72 (GS-12, Step 1, $\$31.70 \times 1.6$), and Clerical rate of \$27.46 (GS-6, Step 3, $\$17.16 \times 1.6$). These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality, rates of pay.
- ^c New respondents will become subject to 40 CFR Part 60, Subpart OOOOa.
- ^d We have assumed that it will take each existing respondent eight hours, two times per year to review semiannual reports.
- ^e Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2b: Average Annual EPA Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (Cx D)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost ^b
Review notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Review notification of modification ^c	2	1	2	0	0	0	0	\$0
Review notification of anticipated startup ^c	2	1	2	0	0	0	0	\$0
Review notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Review notification of demonstration of CEMS ^c	2	1	2	0	0	0	0	\$0
Review of CEMS demonstration report ^c	2	1	2	0	0	0	0	\$0
Review notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Review of semiannual reports ^d	8	2	16	17	272	14	27	\$15,472.58
Review results of performance test ^c	2	1	2	0	0	0	0	\$0
TOTAL (Rounded) ^e						313		\$15,500

Assumptions:

- ^a We have assumed that the average number of existing respondents that will be subject to Subpart LLL will be 17. This estimated average accounts for modified facilities after August 2, 2016 subject to Subpart LLL will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.
- ^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$68.37 (GS-13, Step 5, $\$42.73 \times 1.6$), Technical rate of \$50.72 (GS-12, Step 1, $\$31.70 \times 1.6$), and Clerical rate of \$27.46 (GS-6, Step 3, $\$17.16 \times 1.6$). These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality, rates of pay.
- ^c New respondents will become subject to 40 CFR Part 60, Subpart OOOOa.
- ^d We have assumed that it will take each existing respondent eight hours, two times per year to review semiannual reports.
- ^e Totals are rounded to three significant figures. Figures may not add exactly due to rounding.