

Table 1: Annual Respondent Burden and Cost – NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per year (C=AxB)	(D) Respondents per year ^a	122.66	149.84	60.88	(H) Total Cost per year ^b
					(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements ^c	2	1	2	73	146	7.3	14.6	\$19,891.04
B. Required activities	N/A							
C. Create information	N/A							
D. Gather existing information	4	1	4	73	292	14.6	29.2	\$39,782.08
E. Write Report								
i. Notification of construction/reconstruction ^d	2	1	2	6	12	0.6	1.2	\$1,634.88
ii. Notification of actual startup ^d	2	1	2	6	12	0.6	1.2	\$1,634.88
iii. Notification of date of CMS performance evaluation ^d	2	1	2	6	12	0.6	1.2	\$1,634.88
iv. Notification of planned date of performance test ^d	2	1	2	6	12	0.6	1.2	\$1,634.88
v. Notification of compliance status report ^d	4	1	4	6	24	1.2	2.4	\$3,269.76
vi. Semiannual Periodic Report	4	2	8	73	584	29.2	58.4	\$79,564.16
Subtotal for Reporting Requirements						1258		\$149,046.56
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities ^d	16	1	16	6	96	4.8	9.6	\$13,079.04
C. Implement activities	N/A							
D. Develop record system								
i. Control equipment ^d	4	1	4	6	24	1.2	2.4	\$3,269.76
E. Time to enter information								
i. Control device design ^d	4	1	4	6	24	1.2	2.4	\$3,269.76
ii. Control equipment testing ^d	1	1	1	6	6	0.3	0.6	\$817.44
iii. Control equipment inspection	8	2	16	73	1168	58.4	116.8	\$159,128.32
iv. Control equipment monitoring	1	2	2	73	146	7.3	14.6	\$19,891.04
v. Control device CMS	1	6	6	73	438	21.9	43.8	\$59,673.12
F. Time to train personnel	4	1	4	73	292	14.6	29.2	\$39,782.08
G. Perform Audits	N/A							
H. Retain records of actual throughput (facilities exempt under 63.1270(f) ^e)	N/A							
Subtotal for Recordkeeping Requirements						2,523		\$298,910.56
TOTAL LABOR BURDEN AND COST (rounded)^f						3,780		\$448,000
TOTAL CAPITAL AND O&M COST (rounded)^f								\$0
GRAND TOTAL (rounded)^f								\$448,000

Assumptions:

^a We have assumed that there are approximately 67 respondents subject to the rule, on average over the three year period. It is estimated that 6 additional new or reconstructed sources becoming subject to the rule annually over the next three years, for a total of 73 respondents.

^b This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 It is estimated that each source will familiarize themselves with the rule requirements each year.

^d One-time requirement for the 6 new or reconstructed sources. Performance test reports are submitted with the Notification of Compliance Status and must be developed using EPA's Electronic Reporting Tool (ERT) and submitted through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

^e Respondents are expected to maintain records of actual annual throughput as a standard business practice; therefore, there is no additional burden associated with these records under this rule.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transmission and Storage (40 CFR Part 63, Subpart HHH) (Re

					51.23	69.04	27.73	
Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
Review reports								
a. Initial notification	2	1	2	6	12	0.6	1.2	\$689.46
b. Preconstruction review application	4	1	4	6	24	1.2	2.4	\$1,378.92
c. Performance test notification	2	1	2	6	12	0.6	1.2	\$689.46
d. Compliance status notification	4	1	4	6	24	1.2	2.4	\$1,378.92
e. Semiannual periodic reports	2	2	4	73	292	14.6	29.2	\$16,776.86
TOTAL ANNUAL BURDEN AND COST^c					419			\$20,900

Assumptions:

^a We have assumed that there are approximately 67 respondents subject to the rule, on average over the three year period. It is estimated that 6 additional new or reconstructed sources becoming subject to the rule annually over the next three years, for a total of 73 respondents.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$69.04 for Managerial, \$51.23 for Technical, and \$27.73 for Clerical. These rates are from the Office of Personnel Management (OPM) “2021 General Schedule” which excludes locality rates of pay.

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