

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal), EPA ICR Number 2437.05, OMB Control Number 2060-0673.

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) were proposed on August 23, 2011, and promulgated on August 16, 2012. These regulations apply to oil and natural gas facilities that commence construction, modification or reconstruction after August 23, 2011 and on or before September 19, 2015, that are involved in the extraction and production of oil and natural gas, as well as for the processing, transmission, and distribution of natural gas. Affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after September 18, 2015, are instead subject to subpart OOOOa (40 CFR 60, Subpart OOOOa). This information is being collected to assure compliance with 40 CFR Part 60, Subpart OOOO.

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 retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the appropriate EPA regional office and to the delegated state or local authority, with the exception of the ‘advance well’ completion notifications. For advance well completion notifications, if you are subject to state regulations that require advance notification of well completions and you have met those notification requirements, then you do not have to submit the ‘advance well’ completion notification to any EPA regional office. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The term “Affected Public” applies to oil and natural gas production, natural gas processing, natural gas transmission, and natural gas distribution facilities. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS

for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal). There are approximately 532 oil and natural gas production and natural gas processing, transmission, and distribution facilities, which are owned and operated by the oil and gas production industry. The 532 existing sources, along other entities, comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants, and 12 sweetening units. None of the 532 facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 31 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site). This estimate is based on an estimate of 16,636 units (i.e., centrifugal compressors, reciprocating compressors, pneumatic controllers, or storage vessels) at 532 facilities (see section 6(d) of this document).

Over the next three years, approximately 532 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. New facilities constructed after September 19, 2015 are subject to requirements under NSPS Subpart OOOOa.

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

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best-demonstrated technology (BDT).

Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, volatile organic compound (VOC) and sulfur dioxide emissions from oil and natural gas production, natural gas transmission, and natural gas distribution facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart OOOO.

## **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.

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

The required annual and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports.

The EPA is requiring that owners or operators of affected sources would submit electronic copies of performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI).

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 60, Subpart OOOO performance test reports be submitted through the EPA's ERT.

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

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart OOOO.

#### **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* (FR citation, e.g., 86 FR 8634) on February 8, 2021. Two comments were received from private individuals on the burden published in the *Federal Register* for this renewal. Both commenters stated that they agree with the burden that was published.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Following the June 2016 amendments (81 FR 35824), facilities with new affected sources that would have previously met the requirements for Subpart OOOO must now meet the requirements of 40 CFR 60, Subpart OOOOa. Therefore, there are no new respondents under this ICR. The Agency assumes that the number of existing respondents that would be subject to subpart OOOO will decrease over time as sources are either modified (and therefore subject to subpart OOOOa) or retired. Therefore, we believe

approximately 532 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Independent Petroleum Association of America (IPAA), at (202) 857-4722, and the American Exploration & Production Council (AXPC), at (202) 920-1507.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. The comments received and our responses may be found in Section 3(b) above and the docket for this ICR at <https://www.regulations.gov>. In this case, we received comments from both the IPAA and the AXPC expressing their concern that the respondent estimates for exploration and production facilities in the prior ICR were too low and should be increased. The IPAA and AXPC were unable to provide precise estimates or data for the number of potential facilities subject to OOOO, and acknowledged that as facilities modify, they would become subject to OOOOa. Ultimately, the commenters stated that the burden of estimated time and cost responding to the ICR may be reasonable. Due to limited availability on the number of exploration and production facilities that remain subject to OOOO, versus OOOOa, we have retained the estimate of 300 facilities from the previously-approved ICR.

### **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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with both the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source and any pattern of non-compliance, and to determine the appropriate level of

enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

**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 (CI)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 owners or operators of ether new or modified oil and natural gas facilities. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for new or modified oil and natural gas facilities are listed in the following table:

<b>Standard (40 CFR Part 60, Subpart OOOO)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Crude Petroleum Extraction	1311	211120
Natural Gas Extraction, Natural Gas Liquids	1321	211130
Natural Gas Transmission and Distribution	4923, 4924, 4925, 4931, 4932, 4939	221210
Pipeline Distribution of Crude Oil	4612	486110
Pipeline Transportation of Natural Gas	4922, 4923	486210

**4(b) Information Requested**

**(i) Data Items**

In this ICR, all the data that are recorded or reported are required by the NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60,

subpart OOOO).

A source must make the following reports:

<b>Notifications</b>	
Notification of date of construction or reconstruction (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(1), 60.5420(a)(1)
Notification of date of actual startup (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(3), 60.5420(a)(1)
Notification of physical or operation change (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(4), 60.5420(a)(1)
General notification and reporting requirements (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§60.19
Notification of the anticipated date of a well completion operation (for gas well affected facilities) <sup>a</sup>	§60.5420(a)(2)(i)

<sup>a</sup> Sources subject to state regulations that require advance notification of well completions and that have met those notification requirements are considered to have met the advance notification requirements of paragraph §60.5420(a)(2)(i).

<b>Reports</b>	
Annual report	§§60.5420(b)(1-6)
Performance test results (electronic submission)	§§60.5420(b)(7-8)
Additional reports for onshore natural gas processing plants	§§60.5422(a-c)
Additional reports of excess emissions for sweetening unit affected facilities at onshore natural gas processing plants	§60.5423(b)

A source must keep the following records:

<b>Recordkeeping</b>	
For each gas well, maintain records identifying each well completion operation and records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with §60.5375.	§§60.5420(b)(2), 60.5420(c)(1)(i-ii)
For each gas well, maintain records required in §60.5375(b) or (f) for	§§60.5420(b)(2),

<b>Recordkeeping</b>	
each well completion operation conducted for each gas well affected facility that occurred during the reporting period.	60.5420(c)(1)(iii)
For each gas well for which you claim an exception under §60.5375(a)(3), maintain a record of the location of the well; the API well number; the specific exception claimed; the starting and ending dates for the period the well operated under the exception; and an explanation of why the well meets the claimed exception.	§§60.5420(b)(2), 60.5420(c)(1)(iv)
For each gas well, maintain a record of the digital photograph, if applicable.	§§60.5420(b)(2), 60.5420(c)(1)(v)
For each centrifugal compressor, maintain records of: identification of each centrifugal compressor using a wet seal system constructed, modified or reconstructed during the reporting period and deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in §60.5380.	§§60.5420(b)(3)(i-ii), 60.5420(c)(2)
Maintain records of each closed vent system inspection required for centrifugal compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(6)
Maintain records of each cover inspection required for centrifugal or reciprocating compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(7)
Maintain records of each inspection, key checkout, or alarm sounding required for centrifugal or reciprocating compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(8)
Maintain records of closed vent system monitoring required for centrifugal or reciprocating compressors.	§§60.5420(b)(3)(iii), 60.5420(c)(9)
Maintain records of carbon replacement schedule required for centrifugal compressors.	§§60.5420(b)(3)(iii), 60.5420(c)(10)
Maintain records of minimum and maximum operating parameter values, continuous parameter monitoring system data, calculated averages of continuous parameter monitoring system data, results of all compliance calculations, and results of all inspections for each centrifugal compressor.	§§60.5420(b)(3)(iii), 60.5420(c)(11)
For each reciprocating compressor, maintain records of cumulative number of hours of operation, records of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system, and records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in §60.5385.	§§60.5420(b)(4), 60.5420(c)(3)(i-iii)



<b>Recordkeeping</b>	
For each pneumatic controller, maintain records of identification, location and manufacturer specifications for each pneumatic controller constructed, modified or reconstructed during the reporting period, records of reasons why pneumatic controllers with a bleed rate of greater than 6 scf/hr are required, records of bleed rate for pneumatic controllers located at natural gas processing plants, and records of deviations where the pneumatic controller was not operated in compliance with the requirements specified in §60.5390.	§§60.5420(b)(5), 60.5420(c)(4)(i-v)
Maintain records of: identification, location, emissions, and deviations for each storage vessel that is constructed, modified, or reconstructed, a statement of VOC emissions reductions and controls, a statement of days of service for mobile storage vessels, and identifications of each storage vessel removed from or returned to service.	§§60.5420(b)(6), 60.5420(c)(5)
Records of carbon adsorber replacement required for storage vessels.	§60.5420(c)(12)
Records of inspections, corrective actions taken, manufacturers' operating instructions, procedures and maintenance schedule, and EPA Method 22 test results for storage vessels.	§60.5420(c)(13)
Records of logs for all inspection, repair and maintenance activities for each control device failing the visible emissions test.	§60.5420(c)(14)
For equipment located at onshore natural gas processing plants, keep records of monitoring events, all actions related to detection and repair of leaks, information pertaining to the design requirements for closed vent systems and control devices, and other applicable requirements as specified in §60.486a.	§§60.5421(a), 60.486a
For pressure relief devices located for onshore natural gas processing plants, keep records of leak detection markers. For each leak detected, keep a record of equipment identification numbers, dates of detection and repair(s), repair methods, repair-related decisions, dates of process shutdowns, and the date of successful repair of the leak.	§60.5421(b)(2)(i-ix)
For equipment located at onshore natural gas processing plants, maintain a list of identification numbers for equipment that are designated for no detectable emissions under the provisions of §60.482-4a(a).	§60.5421(b)(2)(x)
For onshore natural gas processing plants, keep records related to the number of pressure relief valves for which leaks were detected and for which leaks were not repaired as required in §60.5401(b).	§60.5422(c)
For sweetening units located at onshore natural gas processing plants,	§§60.5423(a),

<b>Recordkeeping</b>	
keep records of calculations and measurements required in §60.5405(a) and (b) and §60.5407(a) through (g) for at least 2 years following the date of the measurements.	60.7(d)
For sweetening units located at onshore natural gas processing plants, keep for the life of the facility a record of analysis demonstrating the source's design capacity.	§§60.5423(c-d)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems for onshore natural gas processing plants.	§60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect for onshore natural gas processing plants.	§§60.482-10a(l)(1), (2)
Keep records related to pressure relief devices; number of pressure relief devices for onshore natural gas processing plants.	§§60.5421(b), 60.5422(a)-(c)
Keep records of inspections of closed vent systems during which no leaks are detected for onshore natural gas processing plants.	§§60.482-10a(l)(4), (5)
Keep records of design requirements for and operation of closed vent systems and control devices for onshore natural gas processing plants.	§60.486a(d)
Keep records listing equipment for onshore natural gas processing plants.	§60.486a(e)
Keep records of compliance tests for onshore natural gas processing plants.	§60.486a(e)(4)
Keep records of valves designated as unsafe or difficult to monitor for onshore natural gas processing plants.	§§60.486a(f), 60.5417(b)
Keep records of design criterion that indicate failure for onshore natural gas processing plants.	§60.486a(h)
Keep records of parts not in VOC service or otherwise exempt for onshore natural gas processing plants.	§60.486a(j)

### 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.

The rule was amended to include electronic reporting provisions on August 16, 2012.

Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Gather relevant information.
Perform initial performance test, Methods 1 or 1A; 2, 2A, 2C, or 2D; 3A, 3C, 4, 6, 10, 15, 16A, 21, 22, 25A and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

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

<b>Agency Activities</b>
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**

Following the notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual and 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 this data.

The records required by this regulation must be retained by the owner/operator for five years.

### **5(c) Small Entity Flexibility**

There is a distribution of business sizes for businesses involved in extraction and

production of oil and natural gas, as well as the processing, transmission, and distribution of natural gas. The impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. 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 Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal).

### **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

#### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 69,300 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of this 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)

Clerical            \$60.88 (\$28.99 + 110%)

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.

**(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standard(s) 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 these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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	(G) Total O&M, (E X F)
SO <sub>2</sub> CEMS (control outlet)	\$73,000	0	\$0	\$17,100	12	\$205,200
Continuous control device monitoring for centrifugal compressors <sup>2</sup>	N/A	0	\$0	\$804	52	\$41,808
Continuous control device monitoring for storage vessels <sup>2</sup>	N/A	0	\$0	\$804	1,216	\$977,664
<b>Total (rounded) <sup>3</sup></b>			\$0			\$1,220,000

<sup>1</sup> Annual O&M costs for centrifugal compressors and storage vessels were calculated assuming 2 hours per month at \$33.51 per hour.

<sup>2</sup> Capital/Startup costs for continuous control device monitoring were included in storage vessel and centrifugal compressor control device costs.

<sup>3</sup> 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 \$1,220,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to this industry over the next three years of the ICR is estimated to be \$1,220,000. These are the costs of recordkeeping.

### **6(c) Estimating Agency Burden and Cost**

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

The average annual Agency cost during the three years of the ICR is estimated to be \$146,000.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (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 532 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The 532 existing sources comprise, among other entities, 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants, and 12 sweetening units. The overall average number of respondents is 532 per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	532	0	0	532
2	0	532	0	0	532
3	0	532	0	0	532
Average	0	532	0	0	532

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications for new affected facilities at existing respondent sites.

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 532.

It is important to note that some annual responses and associated burdens in this ICR are specific to the number of affected units at respondents’ sites. Where appropriate, EPA has determined burdens based on the number of units associated with both existing and new respondents. The following table summarizes the values used by EPA to estimate the burden presented in this ICR. These values are derived from Agency information gathered during rule development. The EPA also reviewed the Greenhouse Gas Reporting Program (GHGRP), for which there is significant overlap with sources subject to this ICR. In comparing GHGRP data for the industry sectors relevant to this ICR, EPA found good overall agreement with the number of subject sources estimated for this ICR.

<b>Affected Units at Respondent Sites</b>		
(A) Affected Unit	(B) Affected Sources	(C) Number of Existing Units at Affected Sources
Centrifugal compressors	Processing plants	52
Reciprocating compressors	Gathering & boosting stations	840
	Processing plants	836
Pneumatic controllers	Exploration & production sites	13,632
	Processing plants	60



<b>Affected Units at Respondent Sites</b>		
(A) Affected Unit	(B) Affected Sources	(C) Number of Existing Units at Affected Sources
Storage vessels	Production, processing, transmission, or storage	1,216
Total		16,636

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents <sup>1</sup>	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notifications <sup>2</sup>				
Gas well completion	0	33	0	0
Gas well recompletion	0	4	0	0
New gas processing plant	0	1	0	0
New sweetening unit	0	1	0	0
Annual reports				
Gas well completion/recompletion	0	1	0	0
Sweetening unit	12	1	0	9
Centrifugal compressor	52	1	0	39
Reciprocating compressor	1,676	1	0	1,676
Production pneumatic controller	300	1	0	300
Gas processing pneumatic controller	45	1	0	45
Storage vessel	304	1	0	304
Semiannual reports				
Gas processing plant	87	2	0	87
			Total	2,563

<sup>1</sup> Column B is based on either the number of respondents or the number of affected units, as appropriate for the given information collection activity. The number of respondents and affected units are provided above.

<sup>2</sup> These notifications are initial notifications for sources constructed, modified or re-constructed after August

2011 and prior to September 2015.

The number of Total Annual Responses is 2,563.

The total annual labor costs are \$8,210,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (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 1 and 2 at the end of this document, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 69,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (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 27 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,220,000. 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 2,900 labor hours at a cost of \$146,000; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (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 no change in burden from the most-recently approved ICR as currently-identified in the OMB Inventory of Approved Burdens. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) no new facilities will become subject to these regulations, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 27 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-OAR-2020-0670. 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,” and 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2020-0670 and OMB Control Number 2020-0673 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 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Report requirements	N/A							
a. Familiarization with the rule requirements <sup>c</sup>	1	1	1	532	532	26.6	53.2	\$72,479.68
b. Required activities								
i. Notification of gas well completion <sup>d</sup>	0.5	33	17	0	0	0	0	\$0
ii. Notification of gas well recompletion <sup>d</sup>	0.5	4	2	0	0	0	0	\$0
iii. Notification of new gas processing plant <sup>e</sup>	1	1	1	0	0	0	0	\$0
iv. Notification of new sweetening unit <sup>f</sup>	1	1	1	0	0	0	0	\$0
c. Create information	See 4B							
d. Gather existing information	See 4E							
e. Annual reports								
i. Gas well completion/recompletion <sup>d</sup>	16	1	16	0	0	0	0	\$0
ii. Sweetening unit <sup>f</sup>	1	1	1	9	9	0.45	0.9	\$1,226.16
iii. Centrifugal compressor <sup>g</sup>	8	1	8	39	312	16	31	\$42,506.88

iv. Reciprocating compressor <sup>h</sup>	8	1	8	1,676	13,408	670	1,341	\$1,826,705.9 2
v. Production pneumatic controller <sup>i</sup>	8	1	8	300	2,400	120	240	\$326,976.00
vi. Gas processing pneumatic controller <sup>j</sup>	8	1	8	45	360	18	36	\$49,046.40
vii. Storage vessel <sup>k</sup>	8	1	8	304	2,432	122	243	\$331,335.68
f. Semiannual reports								
i. Gas processing plant <sup>l</sup>	40	2	80	87	6,960	348	696	\$948,230.40
<b>Reporting Subtotal</b>						<b>30,375</b>		<b>\$3,598,507</b>
5. Recordkeeping requirements								
a. Read instructions	See 4A							
b. Plan activities	See 4B							
c. Implement activities								
i. Filing and maintaining records <sup>m</sup>	5	12	60	436	26,160	1,308	2,616	\$3,564,038.4 0
ii. Filing and maintaining records <sup>n</sup>	5	12	60	128	7,680	384	768	\$1,046,323.2 0
d. Record data	N/A							
e. Time to transmit or disclose information								
i. Records required by standards	See 5C							
f. Time to train personnel	See 5C							
g. Time for audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>38,916</b>		<b>\$4,610,362</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>o</sup></b>						<b>69,300</b>		<b>\$8,210,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>o</sup></b>								<b>\$1,220,000</b>
<b>GRAND TOTAL (rounded) <sup>o</sup></b>								<b>\$9,430,000</b>

**Assumptions:**

<sup>a</sup> EPA estimates an average of 532 existing sources and no new sources will be subject to the standard over the next three years. Existing sources comprise 300

exploration and production businesses, 136 transmission and storage operations, 116 processing plants and 12 sweetening units. This number is expected to decrease over time as sources are modified or retired from service.

<sup>b</sup> 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% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> This burden represents the time existing respondents spend re-familiarizing themselves with rule requirements, or that new respondents spend learning rule requirements.

<sup>d</sup> Initial notification and annual reporting for completions and recompletions is required for gas wells that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015. New gas wells or gas wells modified after September 18, 2015 are subject to requirements under 40 CFR 60, Subpart OOOOa.

<sup>e</sup> Processing plants that commenced construction, modification or reconstruction after September 18, 2015 are subject to requirements under 40 CFR 60, Subpart OOOOa.

<sup>f</sup> EPA estimates an average of 12 existing sweetening units and no new sweetening units. EPA estimates that 75% of those sweetening units will experience one reportable deviation per year. Sweetening units that commenced construction, modification or reconstruction after September 18, 2015 are subject to requirements under 40 CFR 60 Subpart OOOOa.

<sup>g</sup> EPA estimates an average of 52 existing and no new centrifugal compressors equipped with wet seals at processing plants. EPA estimates that 75% of those centrifugal compressors will experience one reportable deviation per year. Centrifugal compressors equipped with wet seals at processing plants that commenced construction, modification or reconstruction after September 18, 2015 are subject to requirements under 40 CFR 60 Subpart OOOOa.

<sup>h</sup> EPA estimates an average of 1,676 existing and no new reciprocating compressors. New reciprocating compressors that commenced construction, modification or reconstruction after September 18, 2015 are subject to requirements under 40 CFR 60 Subpart OOOOa.

<sup>i</sup> EPA estimates 13,632 pneumatic controllers across the 300 exploration & production sites. EPA estimates that all 300 sites will experience one reportable deviation per year.

<sup>j</sup> EPA estimates an average of 60 existing and no new pneumatic controllers at affected processing plants. EPA estimates that 75% of those pneumatic controllers will experience one reportable deviation per year.

<sup>k</sup> EPA estimates an average of 304 existing and no new respondents in the production, processing, transmission, or storage segment will submit annual reports. EPA anticipates each report will cover approximately four storage vessels, based on research the Agency conducted during initial rule development.

<sup>l</sup> EPA estimates an average of 116 existing and no new gas processing plants. EPA estimates that 75% of those plants will experience one reportable deviation per year.

<sup>m</sup> Activity applies to exploration & production businesses and transmission & storage operations, for which EPA estimates an average of 300 and 136 sources, respectively.

<sup>n</sup> Activity applies to gas processing plants and sweetening units. EPA estimates an average of 116 existing processing plants and 12 existing sweetening units.

<sup>o</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, subpart OOOO) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
Review initial notifications <sup>c</sup>								
i. Notification of gas well completion	0.5	33	17	0	0	0.0	0	\$0
ii. Notification of gas well recompletion	0.5	4	2	0	0	0	0	\$0
iii. Notification of new gas processing plant	0.5	1	1	0	0.0	0.00	0.00	\$0
iv. Notification of new sweetening unit	0.5	1	1	0	0.0	0.00	0.00	\$0
Review annual reports								
i. Gas well completion/recompletion	1	1	1	0	0	0	0	\$0
ii. Sweetening unit	1	1	1	9	9	0.45	0.9	\$517.10
iii. Centrifugal compressor	1	1	1	39	39	1.95	3.9	\$2,240.75
iv. Reciprocating compressor	1	1	1	1,676	1,676	83.80	167.6	\$96,294.58
v. Production pneumatic controller	1	1	1	300	300	15	30	\$17,236.50
vi. Gas processing pneumatic controller	1	1	1	45	45	2.25	4.5	\$2,585.48
vii. Storage vessel	1	1	1	304	304	15	30	\$17,466.32
Review semiannual reports								



i. Gas processing plant	1	2	2	87	174	8.7	17	\$9,997.17
<b>TOTAL (rounded) <sup>c</sup></b>						<b>2,900</b>		<b>\$146,000</b>

**Assumptions:**

<sup>a</sup> EPA estimates an average of 532 existing sources and no new sources will be subject to the standard over the next three years. Existing sources comprise 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants and 12 sweetening units.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

<sup>c</sup> Initial notification is required for these source categories that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015. New gas wells or gas wells constructed, modified, or reconstructed after September 18, 2015 are subject to 40 CFR 60, Subpart OOOOa.

<sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.