## SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

# NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (Renewal)

## 1. Identification of the Information Collection

## 1(a) Title of the Information Collection

NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT) (Renewal), EPA ICR Number 2465.05, OMB Control Number 2060-0685.

## 1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Greenhouse Gas (GHG) Emissions for New Electric Utility Generating Units (EGUs) (40 CFR Part 60, Subpart TTTT) were proposed on June 2, 2014, and promulgated on October 23, 2015. Amendments to 40 CFR Part 60, Subpart TTTT were proposed on December 6, 2018, but EPA did not finalize amendments to the 2015 final rule. On January 13, 2021, EPA finalized a pollutant-specific significant contribution finding for this source category, which was vacated and remanded on April 5, 2021. These regulations apply to newly constructed, modified or reconstructed facilities with electric utility generating units (EGUs) including any steam generating unit, IGCC, or stationary combustion turbine that either commenced construction after January 8, 2014 or commenced reconstruction after June 18, 2014. To be considered an EGU, the unit must be: (1) capable of combusting more than 250 MMBtu/h heat input of fossil fuel; and (2) serve a generator capable of supplying more than 25 MW net to a utility distribution system (i.e., for sale to the grid). New facilities include those that commenced either construction, or modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart TTTT.

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 of these measurements and retain the file for at least three years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. The delegated state or local authority can review the submitted data through EPA's Clean

Air Markets Program Data. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The 'burden' to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (Renewal). The 'burden' to the "Federal Government" is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR part 60, subpart TTTT) (Renewal). There are approximately 60 existing facilities operating affected natural gas-fired combined cycle and simple cycle combustion turbine units, which are owned and operated by the electric utility industry. None of the 60 facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquries.

Based on our consultations with industry representatives, there are an average of 1.1 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 60 respondents per year will be subject to these standards, and 16 additional respondents per year will become subject to these same standards. This results in an overall average of 92 respondents per year.

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)(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, CO<sub>2</sub> emissions from EGUs 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 TTTT.

## 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.

The rule requires continuous emission monitors to measure CO<sub>2</sub> concentration, stack gas flow rate, and stack gas moisture content in accordance with 40 CFR Part 75 in order to determine hourly CO<sub>2</sub> mass emissions rates. The rule allows owners or operators of EGUs that burn exclusively gaseous or liquid fuels to install fuel flow meters and monitor fuel flow rate, the gross calorific value (GCV) of the fuel, unit operating time, and gross output in place of a continuous emissions monitor. The initial performance compliance demonstration consists of calculating the CO<sub>2</sub> mass emissions rate using the first 12 operating months of data (hourly CO<sub>2</sub> average concentration, mass flow rate, and electrical power generation) on a rolling average basis.

The notifications required in these standards are used to inform the Agency or 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/monitoring devices are properly installed and operated, and that the standards are being met.

The required quarterly 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 quarterly reports, required in 40 CFR 60.5555, using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool provided by the Clean Air Markets Division in the Office of Atmospheric Programs of EPA.

The ECMPS is a desktop software tool that sources must use to submit quarterly emissions summary reports to EPA to comply with 40 CFR Part 60, Subpart TTTT. Using the ECMPS, the emissions summary reports are submitted to the EPA in extensible-markup language (XML) format.

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

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

#### 3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's ECMPS, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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* (87 FR 20847) on April 8, 2022. 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. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 92 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: 1) the Environmental Council of the States (ECOS), at 202-266-4920; 2) the Electric Power Research Institute (EPRI), at 650-855-2121; 3) the Edison Electric Institute (EEI), at 202-508-5000; and 4) the National Conference of State Legislatures (NCSL), at 202-624-5400.

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 that emission limitations are met. If the information required by these same 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 fossil fuel-fired electric utility steam generating units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) are shown in the table below.

Standard (40 CFR Part 60, Subpart TTTT)	SIC Codes	NAICS Codes
Fossil Fuel Electric Power Generation	4931, 4939, 4911	221112
Electric Power Generation, Transmission and Distribution	4931, 4939, 4911	2211
Fossil fuel electric power generating units in American Indian and Alaska Native lands	8641	921150

## 4(b) Information Requested

# (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Greenhouse Gas Emissions for New Electric Utility Generating Units (40 CFR Part 60, Subpart TTTT).

A source must make the following reports:

Notifications	
Notification of construction	§60.7(a)(1), §60.5550(a)
Notification of startup	§60.7(a)(3), §60.5550(a)

Reports	
Electronic quarterly compliance reports (includes excess emissions and downtime)	§§60.5555(a), (b)

A source must keep the following records:

Recordkeeping	
Records of hourly and total CO <sub>2</sub> mass emissions calculations	§§60.5560(c)-(g)
Records of malfunctions or downtime	§§60.7(b), §60.5560(a)
Records of performance evaluations	§§60.7(f), §60.5560(a)

## **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.

Respondents are required to use the EPA's ECMPS Client Tool to develop quarterly emissions summary reports that include excess emissions and continuous monitoring systems performance data and submit them through the EPA's ECMPS, which can be accessed on the EPA's ECMPS Support website (<u>https://ecmps.camdsupport.com/downloads.shtml</u>). The ECMPS Client Tool is an application, rather than a form, and the requirement to use the ECMPS is applicable to numerous regulations (Acid Rain Program, Cross-State Air Pollution Rule, Greenhouse Gas Reporting Program, Mercury Air Toxics Standards "MATS" etc.). For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and 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 this rule, see:

<u>https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert</u>.

# (ii) Respondent Activities

# **Respondent Activities**

Familiarization with the regulatory requirements.

Install, calibrate, maintain, and operate CEMS for CO2 or monitors for fuel flow rate, and unit operating time of the EGU.

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:

# **Agency Activities**

Review notifications and reports, including quarterly emissions summary reports (includes 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 notification of startup, the reviewing authority could inspect the source to determine whether the  $CO_2$  CEMS and the associated automatic data acquisition system are properly installed and operated. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly 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. 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 three 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 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 GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (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 3,130 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	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup and/or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in this regulations are labor costs. There are no capital/startup and/or operation and maintenance costs.

## 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 \$88,300.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34(GS-6, Step 3, \$17.17 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (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 60 existing respondents will be subject to these standards. It is estimated that an additional 16 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 92 per year.

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

Number of Respondents								
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	16	60	0	0	76			
2	16	76	0	0	92			
3	16	92	0	0	108			
Average	16	76	0	0	92			

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

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 92.

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				
Prepare/Submit Emissions Summary Report	92	4	0	368				
Notification of construction	16	1	0	16				
Notification of startup	16	1	0	16				
			Total	400				

The number of Total Annual Responses is 400.

The total annual labor costs are \$376,000 (rounded). Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (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 3,130 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (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 8 hours per response.

There are no annual capital/startup or O&M costs to the regulated entity.

## (ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,730 labor hours at a cost of \$88,300; see below in Table 2: Average Annual EPA Burden and Cost - NSPS for GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (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

The increase in 'burden' from the most-recently approved ICR is due to an adjustment. The adjustment increase in burden from the most-recently approved ICR is due to an increase in the number of respondents. Based on our consultation with the Agency's internal industry experts and the review of data from EPA's Clean Air Markets Division and the U.S. Energy Information Administration, the electric utility sector is undergoing significant changes and the number of respondents and new sources expected over the next three years has increased significantly from the most-recently approved ICR. Additionally, the estimated costs have increased due to the use of updated labor rates from the most-recent Bureau of Labor Statistics report (September 2021).

Although we are assuming there will be 16 new sources per year subject to 40 CFR Part 60, Subpart TTTT, there is no change in the capital/startup vs. operation and maintenance (O&M) costs as discussed in section 6(b)(iii) compared with the costs in the most-recently approved ICR. There are no capital/startup or O&M costs for this ICR. As described in a previous *Federal Register* notice (84 FR 25046), this NSPS imposes a minimal information collection burden on affected sources beyond what sources would already be subject to under the authorities of CAA Parts 75 (Acid Rain Program CEM requirements) and 98 (Mandatory GHG Reporting, applicable to EGUs that capture CO<sub>2</sub>). OMB has previously approved the information collection requirements contained in the existing Part 75 and 98 regulations (40 CFR Part 75 and 40 CFR Part 98) under the provisions of the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. and has assigned OMB control numbers 2060-0626 and 2060-0629, respectively. Apart from certain reporting costs to comply with the emission standards under the rule, there are no additional information collection costs, as the information required by the rule is already collected and reported by other regulatory programs.

## 6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 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-2022-0047. An electronic version of the public docket is available at <u>http://www.regulations.gov/</u>, 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. 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-2022-0047 and OMB Control Number 2060-0685 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 GHG Emissions for Newly Constructed, Modified, and

 Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (Renewal)

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year <sup>a</sup>	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x .05)	(G) Clerical Hours/Year (E x .10)	(H) Cost/ Year <sup>c</sup>
1. Applications								
2. Survey and studies								
3. Acquisition, installation, and utilization of technical systems								
4. Reporting Requirements								
A. Familiarization with regulatory requirements <sup>b</sup>								
Existing Facilities	8	1	8	92	736	37	74	\$101,621.36
New Facilities	30	1	30	16	480	24	48	\$66,274.80
B. Required activities								
Notification of construction	2	1	1	16	16	1	2	\$2,209.16
Notification of startup	2	1	1	16	16	1	2	\$2,209.16

C. Create information	See 4E							
D. Gather existing information	See 4E				•			
E. Prepare/Submit Emissions Summary Report Includes reporting of excess emissions & downtime	4	4	16	92	1,472	74	147	\$203,242.72
Reporting Subtotal						3,128		\$375,557
5. Recordkeeping requirements	See 4A-E				•			
Recordkeeping Subtotal <sup>d</sup>	•					0		\$0
TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup>	-		•			3,130		\$376,000
TOTAL CAPITAL AND O&M COSTS (rounded) <sup>e</sup>								\$0
GRAND TOTÀL (rounded) <sup>e</sup>								\$376,000

### Assumptions

<sup>a</sup> We have assumed there are approximately 60 existing sources and 16 new sources per year anticipated over the next 3 years, resulting in overall average of 92 respondents per year. We have further assumed that there are approximately 106 units (34 combined cycle CT facilities and 72 simple cycle CT units) at 92 facilities.

<sup>b</sup> Assumes one-time burden of 30 hours for new sources to read and understand rule requirements. Assumes existing respondents will spend 8 hours to refamiliarize with the regulatory requirements each year.

<sup>c</sup> This ICR uses the following labor rates: Technical \$123.94 (\$59.02 + 110%); Managerial \$157.61 (\$75.05 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

<sup>d</sup> All recordkeeping burden is accounted for in the listed reporting activities.

<sup>e</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 GHG Emissions for Newly Constructed, Modified, and Reconstructed EGUs (40 CFR Part 60, Subpart TTTT) (Renewal)

Burden Item	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year <sup>a</sup>	(F) Technical Hours/ Year (C x D)	(G) Managerial Hours/ Year (E x .05)	(H) Clerical Hours/Year (E x .10)	(I) Cost/ Year <sup>b</sup>
Notification of construction	1	1	1	16	16	1	2	\$940
Notification of startup	1	1	1	16	16	1	2	\$940
Review Emissions Summary Report Includes reporting of excess emissions & downtime	4	4	16	92	1,472	74	147	\$86,454
GRAND TOTAL (rounded) <sup>c</sup>						1,730		\$88,300

#### Assumptions

<sup>a</sup> We have assumed there are approximately 60 existing sources and 16 new sources per year anticipated over the next 3 years, resulting in overall average of 92 respondents per year. We have further assumed that there are approximately 106 units (34 combined cycle CT facilities and 72 simple cycle CT units) at 92 facilities.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Technical \$52.37 (GS-12, Step 1, \$32.73 + 60%); Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); and Clerical \$28.34(GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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