

ICR Summary Information

Hours per Response	8
Number of Respondents	92
Total Estimated Burden Hours	3,130
Total Estimated Costs	\$376,000
Annualized Capital O&M	\$0
Total Annual Responses	400
Form Number	Not Applicable

Stacie Enoch:
Based on EPA consult response new per year due to growth/sig started with 60 (went with low estimate), works out to be an o

Tried to confirm EPA's estimate like Christian was using CAMD (fewer than that if I specifically TTTT (closer to the original esti CAMD expert, and says records underestimate because it's only facilities (see Sarah's response

Unable to find subparts listed in

Checked a crosswalk of CAMD t (<https://www.epa.gov/airmarket> download saved on S drive) and operating as of 2015 (rule is ap construction after January 8, 20 operating), and there are proba to narrow down the 84 to Subp

All this to say, I think Christian' probably a reasonable estimate and crosswalk overestimate.

, there are 60-70 existing facilities, 16 significant changes in utility sector. I end since we're doubling the previous overall avg of 92 over 3 years.

s with CAMD and EIA datasets. Sounds data for the 60-70 estimate, and I see look at records flagged for Subpart (estimate of 32). Sarah Downes (ERG) is ; flagged for Subpart TTTT is likely an y showing the subset of Subpart TTTT (saved on S drive in consults folder).

n a few EIA datasets.

to EIA units
ts/power-sector-data-crosswalk, Excel
d found ~84 unique facilities that are
pplicable to units that commenced
)14, wasn't sure how soon they'd start
ably other filters that would be needed
art TTTT facilities...

s estimate of 60-70 existing sources is
e in between my CAMD underestimate

Table 1: Annual Respondent Burden and Cost - NSPS for GHG Emissions for Newly

	(A) Hours per Occurrence
1. Applications	
2. Survey and studies	
3. Acquisition, installation, and utilization of technical systems	
4. Reporting Requirements	
A. Familiarization with regulatory requirements ^b	
Existing Facilities	8
New Facilities	30
B. Required activities	
Notification of construction	2
Notification of startup	2
C. Create information	See 4E
D. Gather existing information	See 4E
E. Prepare/Submit Emissions Summary Report Includes reporting of excess emissions & downtime	4
<i>Reporting Subtotal</i>	
5. Recordkeeping requirements	See 4A-E
<i>Recordkeeping Subtotal</i> ^d	
TOTAL LABOR BURDEN AND COST (rounded) ^e	
TOTAL CAPITAL AND O&M COSTS (rounded) ^e	
GRAND TOTAL (rounded) ^e	

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

123.94

157.61

62.52

(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year^a	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x .05)	(G) Clerical Hours/Year (E x .10)
1	8	92	736	37	74
1	30	16	480	24	48
1	1	16	16	1	2
1	1	16	16	1	2
4	16	92	1,472	74	147
			3,128		
			0		
			3,130		

var anticipated over the next 3 years, resulting in overall average of 92 respondents per year. We have 1
le CT units) at 92 facilities.

ements. Assumes existing respondents will spend 8 hours to refamiliarize with the regulatory requiren

al \$157.61 (\$75.05 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United St
upational and industry group.” The rates are from column 1, “Total compensation.” The rates have bee
ss costs of employing workers beyond their wages and benefits, including business expenses associate
rcent of Technical hours, and Clerical hours are 10 percent of Technical hours.

nding.

(H) Cost/ Year ^c
\$101,621.36
\$66,274.80
\$2,209.16
\$2,209.16
\$203,242.72
\$375,557
\$0
\$376,000
\$0
\$376,000

8 hrs/response

further assumed

ments each year.

ates Department
n increased by
d with hiring,

Table 2: Average Annual EPA Burden and Cost - NSPS for GHG Emissions for Newly C

Burden Item
Notification of construction
Notification of startup
Review Emissions Summary Report Includes reporting of excess emissions & downtime
GRAND TOTAL (rounded) ^c

Assumptions

^a We have assumed there are approximately 60 existing sources and 16 new sources per year and there are approximately 106 units (34 combined cycle CT facilities and 72 simple cycle CT un

^b This cost is based on the average hourly labor rate as follows: Technical \$52.37 (GS-12, Step 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical General Schedule, which excludes locality rates of pay. The rates have been increased by 60 p

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

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 ^a	(F) Technical Hours/ Year (C x D)	(G) Managerial Hours/ Year (E x .05)	(H) Clerical Hours/Year (E x .10)
1	1	1	16	16	1	2
1	1	1	16	16	1	2
4	4	16	92	1,472	74	147
					1,730	

anticipated over the next 3 years, resulting in overall average of 92 respondents per year. We have further a (units) at 92 facilities.

1, \$32.73 + 60%); Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); and Clerical \$28.34(GS-6, Step 3, 10 hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM) 10 percent to account for the benefit packages available to government employees.

ng.

(I) Cost/ Year^b
\$940
\$940
\$86,454
\$88,300

ssumed that

\$17.17 +
1), 2022

The only type of industry costs associated with the information collection activity in the regulations is

are labor costs. There are no capital/startup or operation and maintenance costs for this ICR.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	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

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	16	60	0	0
2	16	76	0	0
3	16	92	0	0
Average	16	76	0	0

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
76
92
108
92