

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 plicable 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 | |

Assumptions

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

^b Assumes one-time burden of 30 hours for new sources to read and understand rule requirements

^c This ICR uses the following labor rates: Technical \$123.94 (\$59.02 + 110%); Managerial \$136.31 (\$64.91 + 110%); Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupation, by sex, race, and hispanic or latino ethnicity, 2019", <https://www.bls.gov/news.release/ocwz2.pdf>. 110 percent to account for varying industry wage rates and the additional overhead business expenses for training, and equipping their employees. This ICR assumes that Managerial hours are 5 percent of total hours.

^d All recordkeeping burden is accounted for in the listed reporting activities.

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

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 (100 full-time CT units) at 92 facilities.

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

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 | (E) 52.37 | (F) Technical Hours/ Year (C x D) | (G) 70.56 Managerial Hours/ Year (E x .05) | (H) 28.34 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.

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