

### ICR Summary Information

Hours per Response	16
Number of Respondents	5,146
Total Estimated Burden Hours	60,600
Total Estimated Costs	\$8,390,000
Annualized Capital O&M	\$1,110,000
Total Annual Responses	3,781
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – NESHAP for Oil and Natural Gas Production**

	(A)	(B)	(C)	(D)
Burden item	Technical Person hours per occurrence	No. of occurrences per respondent per year	Technical Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
a. Familiarize with regulatory requirements <sup>c</sup>				
New sources	4	1	4	169
Existing sources (major source only)	1	1	1	650
b. Required activities	N/A			
<i>Major sources</i>				
i. Notification of construction/reconstruction <sup>c</sup>	2	1	2	28
ii. Notification of actual startup <sup>c</sup>	2	1	2	28
iii. Notification of date of CMS performance evaluation <sup>c</sup>	2	1	2	28
iv. Notification of date of performance test <sup>c</sup>	2	1	2	28
v. Notification of compliance status report <sup>c</sup>	4	1	4	28
vi. Affirmative Defense and malfunction reports <sup>e</sup>	2	2	4	650
vii. Semiannual periodic report <sup>e</sup>	2	2	4	650
<i>Area sources</i>				
i. Notification of intent to construct <sup>c</sup>	2	1	2	3
ii. Notification of actual startup date <sup>c</sup>	1	1	1	3
iii. Notification of intent to conduct performance test <sup>c, f</sup>	2	1	2	16
iv. Notification of date of CMS performance evaluation <sup>c, f</sup>	2	1	2	16
v. Notification of compliance status <sup>f</sup>	10	1	10	16
vi. First periodic report <sup>g</sup>	4	1	4	3
vii. Subsequent periodic reports <sup>g</sup>	2	1	2	87
viii. Affirmative Defense and malfunction reports <sup>h</sup>	2	10	20	90
c. Create information	N/A			
d. Gather existing information <sup>c</sup>	8	1	8	169
e. Affirmative defense <sup>d</sup>	N/A			
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping requirements				
a. Familiarize with rule requirement				
Major source <sup>i</sup>	4	1	4	28
Area source <sup>i</sup>	4	1	4	141
b. Plan activities				
Major source	16	1	16	28
Area source				

i. Sources required to operate add-on controls <sup>j</sup>	16	1	16	90
ii. Sources required to implement MP <sup>k</sup>	4	1	4	138
<b>c. Implement activities</b>				
Major source	N/A			
Area source				
i. Performance test <sup>l</sup>	35	1	35	16
ii. Design analysis <sup>l</sup>	12	1	12	74
iii. Control equipment leak monitoring <sup>j</sup>	3	2	6	90
iv. Operate and maintain CMS <sup>j, m</sup>	2	12	24	90
<b>d. Develop record system</b>				
Major source				
i. Control equipment <sup>c</sup>	8	1	8	28
ii. Equipment inspection and monitoring <sup>n</sup>	13	1	13	650
Area source				
Control equipment <sup>o</sup>	8	1	8	16
<b>e. Time to enter information</b>				
Major source				
i. Control equipment monitoring <sup>n, p</sup>	1	2	2	650
ii. Control device CMS <sup>n, p, q</sup>	1	12	12	650
iii. Equipment inspection and monitoring <sup>n, p, q</sup>	1	12	12	650
Area source				
i. Control equipment leak monitoring <sup>j, r</sup>	1	2	2	90
ii. CMS measurements <sup>j</sup>	1	12	12	90
<b>f. Time to train personnel</b>				
Major source <sup>c, s</sup>	8	1	8	28
Area source <sup>c, s</sup>	8	1	8	3
<b>g. Maintain records (area source)<sup>j, t</sup></b>	20	1	20	90
h. Retain records of emission <sup>u</sup>	1	1	1	4,250
i. Retrieve records/reports <sup>j, v</sup>	20	1	20	90
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Costs (rounded)<sup>w</sup></b>				
<b>Total Capital and O&amp;M Cost (rounded)<sup>w</sup></b>				
<b>GRAND TOTAL (rounded)<sup>w</sup></b>				

**Assumptions:**

<sup>a</sup> We assume that on average there are 5,146 existing sources (650 existing major sources and 4,337 existing area source additional 169 new respondents (28 new major source respondents and 141 new area source respondents) per year will be of this ICR due to new construction. We assume that all 141 of the new area source respondents are newly constructed and constructed (greenfield) major sources. The remaining 10 new major source respondents are existing major sources that we though they were new major source respondents.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05+ 110%); Technical \$123.94 (\$59.02 + 110%); and States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational category. The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead burden including business expenses associated with hiring, training, and equipping their employees.

<sup>c</sup> New respondents are comprised of: 28 new major source respondents that are required to file reports, 3 new area source respondents that only maintain records, for a total of 169 new respondents per year on average. For existing respondents with the regulatory requirement. Most area source respondents only have recordkeeping requirements.

<sup>d</sup> Not applicable.

<sup>e</sup> We assume that affirmative defense and malfunction reports may be included as part of the semiannual periodic report. All existing major sources are subject to malfunction and semiannual reports.

<sup>f</sup> We assume that 11% of new area sources are located within an urbanized area (UA)/urban cluster (UC) plus offset bou recordkeeping requirements.

<sup>g</sup> We assume that 2% of existing area sources and 3 new area sources will complete this activity.

<sup>h</sup> We assume that affirmative defense and malfunction reports may be included as part of the semiannual periodic reports will complete this activity. In addition, we estimate two hours are required to complete each report.

<sup>i</sup> We assume that it will take each of the new sources (28 major and 141 area) four hours to read instructions.

<sup>j</sup> We assume that 2% of the 4,337 existing area sources (87 sources) and 3 new area sources will complete this activity.

<sup>k</sup> This applies to new area sources that only keep records.

<sup>l</sup> Performance of control devices can be evaluated with performance tests or design analysis. The estimated hours per act Number 1788.09 and 2440.02.

<sup>m</sup> We assume that it will take each respondent two hours twelve times per year to implement this activity.

<sup>n</sup> This applies to the existing major sources.

<sup>o</sup> The 11% of new area sources doing a performance test on control equipment need to develop a record system. The esti from EPA ICR Number 1788.09 and 2440.02.

<sup>p</sup> We assume that all of the major sources will each take one hour to enter information.

<sup>q</sup> We assume that each respondent will be required to enter information twelve times per year.

<sup>r</sup> We assume that each respondent will be required to enter information two times per year.

<sup>s</sup> We assume that new respondents subject to reporting requirements will take eight hours to train personnel in the recor

<sup>t</sup> We assume that it will take 20 hours for each respondent to maintain records.

<sup>u</sup> We assume that 98% of the 4,337 existing area source respondents are subject only to the recordkeeping requirements. emissions.

<sup>v</sup> We assume that each respondent will take twenty hours once per year to retrieve records/reports.

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

1 (40 CFR Part 63, Subpart HH) (Renewal)

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per Year <sup>b</sup>
676	33.8	67.6	\$93,337.99
650	32.5	65	\$89,748.07
56	2.8	5.6	\$7,732.14
56	2.8	5.6	\$7,732.14
56	2.8	5.6	\$7,732.14
56	2.8	5.6	\$7,732.14
112	5.6	11.2	\$15,464.28
2,600	130	260	\$358,992.27
2,600	130	260	\$358,992.27
6	0.3	0.6	\$828.44
3	0.15	0.3	\$414.22
31.0	1.6	3.1	\$4,283.05
31.0	1.6	3.1	\$4,283.05
155.1	7.8	15.5	\$21,415.27
12	0.6	1.2	\$1,656.89
173	9	17	\$23,953.07
1794.8	89.7	179.5	\$247,815.13
1352	67.6	135	\$186,675.98
<b>11,983</b>			<b>\$1,438,789</b>
112	5.6	11.2	\$15,464.28
564	28.2	56.4	\$77,873.71
448	22.4	44.8	\$61,857.13

Labor Rates	
Manager	\$157.61
Technical	\$123.94
Clerical	\$62.52

2% of existing area sources

1436	72	144	\$198,252.10
552	27.6	55.2	\$76,216.82
542.85	27.1425	54.285	\$74,953.44
891	45	89	\$122,990.75
538	27	54	\$74,344.54
2154	108	215	\$297,378.15
224	11.2	22.4	\$30,928.56
8450	423	845	\$1,166,724.88
124.08	6.204	12.408	\$17,132.22
1300	65	130	\$179,496.14
7800	390	780	\$1,076,976.81
7800	390	780	\$1,076,976.81
179	9	18	\$24,781.51
1077	54	108	\$148,689.08
224	11.2	22.4	\$30,928.56
24	1.2	2.4	\$3,313.77
1795	90	179	\$247,815.13
4250	213	425	\$586,850.19
1795	90	179	\$247,815.13
<b>48,622</b>			<b>\$5,837,759.70</b>
<b>60,600</b>			<b>\$7,280,000</b>
			<b>\$1,110,000</b>
			<b>\$8,390,000</b>

2% of existing area sources and 3 new

# response  
3,781                      60,600

hr/response  
16.0

is) during the three-year period of this ICR. We assume that an  
 ecome subject to new requirements under the rule over the three years  
 rea sources, while 18 of the 28 new major source respondents are newly  
 perform construction or reconstruction and are required to file reports as

id Clerical \$62.52 (\$29.77 + 110%). These rates are from the United  
 nd industry group.” The rates are from column 1, “Total compensation.”  
 siness costs of employing workers beyond their wages and benefits,

the respondents that are required to file reports, and 138 new area sources, we assume only major source respondents will need to re-familiarize

s. In addition, we estimate two hours are required to complete each

boundary and have facilities subject to control, monitoring, and

s. We assume that 2% of existing area sources and 3 new area sources

activity and number of sources are based on estimates from EPA ICR

estimated hours per activity and number of sources are based on estimates

recordkeeping system.

. These sources will take one hour each year to process records of

r area sources





**Table 2: Average Annual EPA Burden and Cost – NESHAP for Oil and Natural Gas Production (40**

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year	Plants per year <sup>a</sup>	Technical person- hours per year
			(C=AxB)		(E=CxD)
<b>Major source</b>					
Initial notification <sup>c</sup>	2	1	2	28	56
Preconstruction review application <sup>c</sup>	4	1	4	28	112
Performance test notification <sup>c</sup>	2	1	2	28	56
Compliance status notification <sup>c</sup>	4	1	4	28	112
Affirmative Defense and malfunction reports <sup>d</sup>	2	2	4	650	2,600
Semiannual periodic reports <sup>e</sup>	2	2	4	650	2,600
<b>Area sources</b>					
Notification of intent to construct	2	1	2	3	6
Notification of actual startup date	2	1	2	3	6
Notification of intent to conduct performance test <sup>f</sup>	2	1	2	16	31.02
Notification of date of CMS performance evaluation	2	1	2	16	31.02
Notification of compliance status	4	1	4	16	62.04
Periodic reports - first and subsequent <sup>g</sup>	2	1	2	90	179
Affirmative Defense and malfunction reports <sup>h</sup>	2	1	2	90	179.48
<b>TOTAL (rounded) <sup>i</sup></b>					

**Assumptions:**

<sup>a</sup> We assume that on average there are 5,146 existing sources (650 existing major sources and 4,337 existing area sources) during that an additional 169 new respondents (28 new major source respondents and 141 new area source respondents) per year will be over the three years of this ICR due to new construction. We assume that all 141 of the new area source respondents are newly constructed (greenfield) major sources. The remaining 10 new major source respondents are for reconstruction and are required to file reports as though they were new major source respondents.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for for the Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical These rates are from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay

<sup>c</sup> We have assumed that this is a one-time only activity for each facility.

<sup>d</sup> We have assumed that affirmative defense and malfunction reports may be included as part of the semiannual periodic reports

<sup>e</sup> We have assumed that each respondent will take two hours two times per year to complete the semiannual periodic reports.

<sup>f</sup> We have assumed that each of the respondents will take two hours once per year to complete requirements.

<sup>g</sup> We assume that 2% of existing area sources and 3 new area sources will complete this activity.

<sup>h</sup> We have assumed that it will take two hours once per year to review reports.

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

**) CFR Part 63, Subpart HH) (Renewal)**

(F)	(G)	(H)
Management person-hours per year	Clerical person-hours per year	Cost, \$ <sup>b</sup>
(Ex0.05)	(Ex0.1)	
2.8	5.6	\$3,288.99
5.6	11.2	\$6,577.98
2.8	5.6	\$3,288.99
5.6	11.2	\$6,577.98
130	260	\$152,703.20
130	260	\$152,703.20
0.3	0.6	\$352.39
0.3	0.6	\$352.39
1.551	3.102	\$1,821.87
1.551	3.102	\$1,821.87
3.102	6.204	\$3,643.73
9.0	18	\$10,541.22
8.974	17.948	\$10,541.22
<b>6,940</b>		<b>\$354,000</b>

Labor Rates	
Managerial	\$70.56
Technical	\$52.37
Clerical	\$28.34

ng the three-year period of this ICR. We assume  
 ecome subject to new requirements under the rule  
 constructed area sources, while 18 of the 28 new  
 e existing major sources that perform construction

enefit packages available to government employees:  
 il rate of \$28.34 (GS-6, Step 3, \$17.71 + 60%).  
 y.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent
THC analyzer (major source) <sup>a</sup>	\$10,200	28	\$285,600	\$1,020
Monitoring equipment (CMS) <sup>b, c</sup>	\$1,015	31	\$31,465	\$134
Postage cost <sup>d</sup>	NA	0	\$0	\$7.63
<b>Total<sup>e</sup></b>			<b>\$317,000</b>	

a. Cost information for THC analyzer is from the EPA Air Pollution Control Cost Manual, January 2002, "Total Equipment Costs for CEMS (\$)." EPA assumes all major sources utilize an organic monitoring device to measure compounds in the exhaust vent system. EPA estimates the cost for a TOC/HAP monitor based on the cost of a THC analyzer.

b. We assume that all new major sources (28) and 2 percent of new area sources (3) are required to purchase CMS.

c. We assume the average number of existing major sources (650), 2% of existing area sources (87), and 3 new area sources associated with CMS.

d. We estimate an average of 3,781 responses (reports).

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

<b>Costs</b>	
(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
650	\$663,000
740	\$99,125
3,781	\$28,846
	<b>\$791,000</b>

**Total Capital and O&M  
\$1,110,000**

Table 4.12: Default Analyzer and Monitor  
 ensure the concentration level of organic  
 a total hydrocarbon (THC) analyzer.

MS per year.

ow area sources have O&M costs

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents <sup>a</sup>	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
<b>Major sources</b>				
Notification of construction/reconstruction	28	1	0	28
Notification of actual startup	28	1	0	28
Notification of date of CMS performance evaluation	28	1	0	28
Notification of date of performance test	28	1	0	28
Notification of compliance status report	28	1	0	28
Affirmative defense and malfunction reports	650	2	0	1,300
Semiannual periodic report	650	2	0	1,300
<b>Area sources</b>				
Notification of intent to construct	3	1	0	3
Notification of actual startup date	3	1	0	3
Notification of intent to conduct performance test	16	1	0	16
Notification of date of CMS performance evaluation	16	1	0	16
Notification of compliance status	16	1	0	16
First periodic report	3	1	0	3
Subsequent periodic reports	87	1	0	87
Affirmative defense and malfunction reports	90	10	0	897
			<b>Total</b>	<b>3,781</b>

<b>Number of Responder</b>				
	(A)			(E)
Year	Number of New Respondents <sup>1,2</sup>			Number of Existi
	Major	Area	Area - Only Keep Records	Major

**ICR 1788.10**

1	28	3	138	470
2	28	3	138	488
3	28	3	138	506
Average	28	3	138	488

**ICR 1788.11**

1	28	3	138	524
2	28	3	138	542
3	28	3	138	560
Average	28	3	138	542

**ICR 1788.12**

1	28	3	138	578
2	28	3	138	596
3	28	3	138	614
Average	28	3	138	596

**ICR 1788.13**

1	28	3	138	632
2	28	3	138	650
3	28	3	138	668
Average	28	3	138	650

<sup>1</sup> New respondents include sources with constructed or reconstructed affected facilities.

<sup>2</sup> We assume that there are 141 new area source respondents and 28 new major source respondents.

<sup>3</sup> All major sources and 2 percent of area sources will maintain records and submit reports.

<sup>4</sup> We assume that 98 percent of area sources will only be required to maintain records.

<sup>5</sup> We estimate 10 of the 28 new major source respondents are existing respondents that become new respondents due to construction/reconstruction. Of the 10 existing respondents that become new major source respondents due to construction/reconstruction, we assume that

its			
3)	(C)	(D)	(E)
ng Respondents <sup>3</sup>	Number of Existing Respondents that keep records but do not submit reports <sup>3, 4</sup>	Number of Existing Respondents That Are Also New Respondents <sup>5</sup>	Number of Respondents (E=A+B-D)
Area	Area	Major	Area + Major
2,927	2,868	10	3,556
3,068	3,007	10	3,715
3,209	3,145	10	3,874
3,068	3,007	10	3,715
3,350	3,283	10	4,033
3,491	3,421	10	4,192
3,632	3,559	10	4,351
3,491	3,421	10	4,192
3,773	3,698	10	4,510
3,914	3,836	10	4,669
4,055	3,974	10	4,828
3,914	3,836	10	4,669
4,196	4,112	10	4,987
4,337	4,250	10	5,146
4,478	4,388	10	5,305
4,337	4,250	10	5,146

struction or reconstruction, while 18 of the 28 new major source respondents are new facilities. That all 10 of these existing respondents are already existing major sources.