

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subparts KKK and LLL) (Renewal)

**OMB Control Number:** 2060-0120

**EPA ICR Number:** 1086.13

**Abstract:** The New Source Performance Standards (NSPS) for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) were proposed on January 20, 1984; promulgated on June 24, 1985; and most-recently amended on August 16, 2012. These regulations apply to Volatile Organic Compound (VOC) emissions at existing facilities located at onshore natural gas processing plants, compressors in equipment leaks of VOC service or in wet gas service, and the groups of all equipment (except compressors) within a process unit. This information is being collected to assure compliance with 40 CFR Part 60, Subpart KKK.

The New Source Performance Standards for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) were proposed on January 20, 1984; promulgated on October 1, 1985; and most-recently amended on August 16, 2012. These regulations apply to sulfur dioxide (SO<sub>2</sub>) emissions at the following types of existing facilities located at onshore natural gas processing plants: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. The provisions of Subpart LLL do not apply to sweetening facilities that produce acid gas that is completely re-injected into oil or gas bearing geologic strata or that is otherwise not released to the atmosphere, or to affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide in the acid gas, expressed as sulfur. This information is being collected to assure compliance with 40 CFR Part 60, Subpart LLL.

On August 16, 2012, EPA issued a new NSPS rule at Subpart OOOO, addressing new and revised requirements for natural gas processing facilities, that are either new or modified sources after August 23, 2011, subject to Subparts KKK and LLL, and which began reporting under 40 CFR 60, Subpart OOOO. On June 3, 2016, EPA issued a new NSPS rule at Subpart OOOOa addressing new and revised requirements for natural gas processing facilities, that are either new or modified sources after August 2, 2016, subject to Subparts KKK and LLL, which will now report under 40 CFR 60, Subpart OOOOa. Although Subparts OOOO/OOOOa address other portions of the oil and gas sector, some of which have not been regulated before, the burden associated with these other rule requirements are not specifically addressed in this ICR.

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 in 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 two years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to either 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 Federal Government is attributed entirely to work performed by either Federal employees or government contractors. None of the affected facilities in the United States are owned by either state, or local, or tribal entities or by the Federal government. All natural gas processing plants subject to these standards are privately-owned, for-profit businesses. Based on our consultations with industry representatives, there is an average of one affected facility 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 291 respondents per year will be subject to Subpart KKK and approximately 14 respondents per year will be subject to Subpart LLL. Any new or modified sources will become subject to NSPS Subpart OOOOa. These estimates reflect a reduction in the number of respondents subject to Subparts KKK and LLL because they became subject to NSPS OOOO/OOOOa due to constructing new, modified, or reconstructed sources.

In accordance with OMB's Terms of Clearance, this supporting statement has been updated to the standard 18 question format.

### **Supporting Statement A**

#### **1. NEED AND AUTHORITY FOR THE COLLECTION**

*Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

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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, VOC and SO<sub>2</sub> emissions from onshore natural gas processing plants 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, Subparts KKK and LLL.

## **2. PRACTICAL UTILITY/USERS OF THE DATA**

*Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

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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 same standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform 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, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

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

## **3. USE OF TECHNOLOGY**

*Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

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Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as

a check on source operation and maintenance, and for compliance determinations. The records required by this regulation must be retained by the owner/operator for two years.

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.

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.

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>.

#### **4. EFFORTS TO IDENTIFY DUPLICATION**

*Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

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For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, 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 either 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.

#### **5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

*If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

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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.

## **6. CONSEQUENCES OF LESS FREQUENT COLLECTION**

*Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

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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 standards was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

## **7. GENERAL GUIDELINES**

*Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.*

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These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

## **8. PUBLIC COMMENT AND CONSULTATIONS**

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### **8a. Public Comment**

*If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.*

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the *Federal Register* for this renewal.

### **8b. Consultations**

*Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

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). The 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 291 respondents will be subject to Subpart KKK over the three-year period covered by this ICR, and approximately 14 respondents will be subject to Subpart LLL 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 GPA Midstream Association, at (918) 493-3872, and the American Petroleum Institute, at (202) 682-8000. The GPA Midstream Association indicated that their members did not have any comments. No other comments were received.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

*Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.*

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No payments or gifts are provided.

## **10. ASSURANCE OF CONFIDENTIALITY**

*Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.*

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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).

## **11. JUSTIFICATION FOR SENSITIVE QUESTIONS**

*Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

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The reporting or recordkeeping requirements in these standards do not include sensitive questions.

## **12. RESPONDENT BURDEN HOURS & LABOR COSTS**

*Provide estimates of the hour burden of the collection of information. The statement should:*

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*

- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

### 12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are onshore natural gas processing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 1321, which corresponds to the North American Industry Classification System (NAICS) code 211130 for Natural Gas Extraction.

Based on our research for this ICR, on average over the next three years, approximately 305 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 overall average number of respondents, as shown in the table below, is 305 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 Existing Respondents that would now report under Subpart OOOOa <sup>a</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports <sup>b</sup>	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E= B+C-A-D)
Subpart KKK					
1	27	345	0	0	318
2	27	318	0	0	291
3	27	291	0	0	264
Average	27	318	0	0	291
Subpart LLL					
1	3	17	3	0	17
2	3	14	3	0	14
3	3	11	3	0	11
Average	3	14	3	0	14
Total <sup>c</sup>					<b>305</b>

- <sup>a</sup> We expect 27 of the existing facilities subject to Subpart KKK to undergo modifications in each year, which would indicate these facilities would report under Subpart OOOOa over the next 3 years and no longer report under Subpart KKK. For Subpart LLL, we expect three facilities to perform a modification and report under Subpart OOOOa each year over the next three years.
- <sup>b</sup> Affected facilities with design capacities of less than two long tons per day (LT/D) of hydrogen sulfide (H<sub>2</sub>S) in the acid gas, expressed as sulfur, have no reporting requirements pursuant to Subpart LLL. Three respondents have sources capacities below this threshold.
- <sup>c</sup> This is the total average of existing respondents subject to both Subparts KKK and LLL.

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 305.

<b>Total Annual Responses</b>				
(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
Subpart KKK				
Semiannual Reports	291	2	N/A	582
Subtotal for Subpart KKK				582
Subpart LLL				
Semiannual Report	14	2	N/A	28
Subtotal for Subpart LLL				28
			<b>Total</b>	<b>610</b>

### 12b. Information Requested

A source must make the following reports:

<b>Notifications</b>	
Notification of construction or reconstruction	§60.7(a)(1)
Notification of actual startup date	§60.7(a)(3)
Notification of modification	§60.7(a)(4)

<b>Reports</b>	
Semiannual reports of excess emissions	§60.7(c)



<b>Reports</b>	
Performance test results	§60.8(a), §60.636(a), §60.487(e)
Semiannual reports (Subpart KKK)	§§60.636(a)-(c), §60.487(a)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms (Subpart LLL)	§60.647(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of startups, shutdowns, malfunctions of affected facilities; malfunctions of control devices; and periods where the continuous monitoring system is inoperative.	§60.7(b)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems.	§60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect (Subpart KKK).	§60.632(a), §§60.482-10(l)(1)-(2)
Keep records of inspections of closed vent systems during which no leaks are detected (Subpart KKK).	§60.632(a), §§60.482-10(l)(4)-(5)
Perform attachment of identification numbers to leaking equipment (Subpart KKK).	§60.635(a), §60.635(b)(1), §60.486(b)(1)
Keep records of leak detection and repair for two years (Subpart KKK).	§60.632(a), §60.486(c), §60.635(a), §60.635(b)(2), §60.482-10(l)(3)
Keep records of design requirements for and operation of closed vent systems and control devices (Subpart KKK).	§60.635(a), §60.486(d)
Keep records listing all equipment subject to the standard (Subpart KKK)	§60.635(a), §60.486(e)
Keep records of compliance tests (Subpart KKK).	§60.635(a), §60.486(e)(4)

<b>Recordkeeping</b>	
Keep records of valves designated as unsafe or difficult to monitor (Subpart KKK).	§60.635(a), §60.486(f)
Keep records of design criterion that indicate failure (Subpart KKK).	§60.635(a), §60.486(h)
Keep records of parts not in VOC service or otherwise exempt (Subpart KKK).	§§60.635(a), (c), §60.486(j)
Keep records of calculations and measurements (Subpart LLL).	§60.647(a)
Facilities that choose to comply with §60.646(e) shall keep, for the life of the facility, records demonstrating that the facility design capacity is less than 150 long tons per day (LT/D) of hydrogen sulfide expressed as sulfur (Subpart LLL).	§60.647(d)

### 12c. Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate temperature sensors, sulfur emission rate monitoring systems, and pressure relief device(s) in gas/vapor service for VOC and SO <sub>2</sub> control devices.
Perform initial performance test, Reference Methods 1, 2, 6, 15, 16, 16A, and ASTM Method D86-78, 82, 90, 95, or 96 tests, 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.

### 12d. Respondent Burden Hours and Labor Costs

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 56,900 hours. The total annual labor costs are \$6,290,000 for

Subpart KKK and \$876,000 for Subpart LLL. Details regarding these estimates may be found at the end of this document in Table 1a: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal). (Total Labor Hours from Tables 1a and 1b below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

This ICR uses the following labor rates:

Managerial	\$163.17 (\$77.70 + 110%)
Technical	\$130.28 (\$62.04 + 110%)
Clerical	\$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.

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.

### **13. RESPONDENT CAPITAL AND O&M COSTS**

*Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

*The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.*

*Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

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The type of industry costs associated with the information collection activities in these subject standards 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 monitors and other costs such as photocopying and postage.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent <sup>b</sup>	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent <sup>c</sup>	(F) Number of Respondents with O&M <sup>d</sup>	(G) Total O&M, (E X F)
SO <sub>2</sub> CEM, control outlet (only for Subpart LLL) <sup>a</sup>	\$103,525	0	\$0	\$24,250	4	\$97,001

<sup>a</sup> Costs reflect installation and maintenance of an in-situ SO<sub>2</sub> CEM after the control device and assume installation occurred during the construction of the facility.

<sup>b</sup> Assume that capital/startup costs for a new sulfur CEMS and control outlet is \$103,525. Capital costs have been increased from 2008 to 2022 \$ using the CEPCI Equipment Cost Index.

<sup>c</sup> Assume that the annual O&M costs of the sulfur CEMS and control outlet is \$24,250. Costs have been increased from 2008 to 2022 \$ using the CEPCI Equipment Cost Index.

<sup>d</sup> We expect 4 existing facilities to have annual O&M costs for monitoring under subpart LLL.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$97,001. These are the recordkeeping costs.

#### **14. AGENCY COSTS**

*Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

##### **14a. 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.

#### **14b. Agency Labor 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 \$299,000.

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

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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 Tables 2a: Average Annual EPA Burden and Cost – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal) and 2b: Average Annual EPA Burden and Costs – NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (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.

#### **14c. Agency Non-Labor Costs**

There are no Agency non-labor costs.

### **15) REASONS FOR CHANGE IN BURDEN**

*Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.*

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There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The change in the burden and cost estimates occurred because the number of respondents subject to these requirements has decreased as those respondents modify their sources and become subject to another NSPS standard. This estimate assumes the same growth rate as stated in the previous ICR. As sources subject to NSPS Subparts KKK and LLL modify, they become subject to NSPS Subpart OOOOa and cease being subject to NSPS Subparts KKK and LLL. Although there is a decrease in the overall burden, there is an increase in the operation & maintenance costs due to an adjustment to increase from 2008 to 2022 \$ using the CEPCI Equipment Cost Index.

### **16) PUBLICATION OF DATA**

*For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

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Although this rule does not require electronic reporting, respondents could choose to submit notifications or reports electronically. All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

#### **17) DISPLAY OF EXPIRATION DATE**

*If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

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EPA will display the expiration date for OMB approval of the information collection.

#### **18) CERTIFICATION STATEMENT**

*Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

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There are not exceptions to the topics of the certification statement.

**Table 1a: Annual Respondent Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart KKK) (Renewal)**

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	291	291	15	29	\$42,197.76
B. Required activities								
Notification of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of modification	8	1	8	0	0	0	0	\$0
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of electing to	8	1	8	0	0	0	0	\$0

comply with alternative standards for valves <sup>c</sup>								
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Affirmative defense	30	1	30	0	0	0	0	\$0
Semiannual reports <sup>d</sup>	8	2	16	291	4,656	232.8	465.6	\$675,164.23
C. Create Information								
Initial performance test <sup>c</sup>	N/A							
D. Gather existing information	N/A							
E. Write report	See 3B							
<b>Reporting Subtotal</b>						<b>5,689</b>		<b>\$717,362</b>
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4C							
B. Plan activities	See 4C							
C. Implement activities	See 3E							
Filing and maintaining records <sup>e</sup>	80	1	80	291	23,280	1164	2,328	\$3,375,821.16
Startup, shutdown, or malfunction	80	1	80	0	0	0	0	\$0
Recalibrate monitors	4	12	48	291	13,968	698	1,397	\$2,025,492.70
Method 21 performance	2	2	4	291	1,164	58.2	116.4	\$168,791.06



evaluation								
D. Develop record system	See 4C							
E. Time to enter information	See 4C							
F. Train personnel	See 4C							
G. Audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>44,174</b>		<b>\$5,570,105</b>
<b>Total Labor Burden and Costs (Rounded) <sup>f</sup></b>						<b>49,900</b>		<b>\$6,290,000</b>
<b>Total Capital and O&amp;M Costs (Rounded) <sup>f</sup></b>								<b>\$0</b>
<b>Grand Total (Rounded) <sup>f</sup></b>						<b>49,900</b>		<b>\$6,290,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing respondents that will be subject to Subpart KKK will be 291. This estimated average accounts for modified facilities after August 23, 2011 subject to Subpart KKK that will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

<sup>b</sup> This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.

<sup>c</sup> New respondents will be subject to 40 CFR Part 60, Subpart OOOOa.

<sup>d</sup> We have assumed that each existing respondent will take 8 hours, two times per year to write semiannual reports.

<sup>e</sup> We have assumed that each existing respondent will take 80 hours to file and maintain records.

<sup>f</sup>Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

**Table 1b: Annual Respondent Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal)**

Burden Item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (Cx D)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	14	14	0.7	1.4	\$2,030.13
B. Required activities								
Initial performance test <sup>c</sup>	60	1	60	0	0	0	0	\$0
Repeat performance test	60	0.2	12	0	0	0	0	\$0
Demonstration of CEMS	80	0.2	16	0	0	0	0	\$0
Repeat Demonstration of CEMS	80	0.2	16	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather existing information	See 3B							
E. Write report								

Notification of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of modification <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration <sup>c</sup>	2	1	2	0	0	0	0	\$0
CMS demonstration	See 3B							
Semiannual report <sup>d</sup>	40	2	80	14	1,120	56	112	\$162,410.64
<b>Reporting Subtotal</b>						<b>1,304</b>		<b>\$164,441</b>
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system <sup>e</sup>	40	1	40	0	0	0	0	\$0
E. Time to enter information								

Records of startup, shutdown, or malfunction	1.5	12	18	0	0	0	0	\$0
Records of continuous recording	0.5	700	350	14	4,900	245	490	\$710,546.55
Records of capacity data	2	1	2	3	6	0.3	0.6	\$870.06
F. Train personnel	N/A							
G. Audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>5,642</b>		<b>\$711,417</b>
<b>Total Labor Burden and Costs (Rounded) <sup>f</sup></b>						<b>6,950</b>		<b>\$876,000</b>
<b>Total Capital and O&amp;M Costs (Rounded) <sup>f</sup></b>								<b>\$97,001</b>
<b>Grand Total (Rounded) <sup>f</sup></b>						<b>6,950</b>		<b>\$973,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing respondents that will be subject to subpart LLL will be 14. This estimated average accounts for modified facilities after August 2, 2016 subject to Subpart LLL that will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

<sup>b</sup> This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.

<sup>c</sup> New respondents will be subject to 40 CFR Part 60, Subpart OOOOa.

<sup>d</sup> We have assumed that each existing respondent will take 40 hours, two times per year to write semiannual reports.

<sup>e</sup> We have assumed that each existing respondent will take 40 hours to develop record system. New respondents will be subject to 40 CFR Part 60, Subpart OOOOa recordkeeping requirements. However, Subpart LLL sources that have modified would need to track capacity data during the year it modified.

<sup>f</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

**Table 2a: Average Annual EPA Burden and Cost - NSPS for Onshore Natural Gas Production (40 CFR Part 60, Subpart KKK) (Renewal)**

<b>Activity</b>	<b>(A) EPA person- hours per occurrence</b>	<b>(B) No. of occurrences per plant per year</b>	<b>(C) EPA person- hours per plant per year (AxB)</b>	<b>(D) Plants per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (Cx D)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person- hours per year (Ex0.1)</b>	<b>(H) Cost <sup>b</sup></b>
Notification of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of modification <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of demonstration of CEMS <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review initial CEMS demonstration report <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0

Review results of performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review semiannual reports <sup>d</sup>	8	2	16	291	4,656	232.8	465.6	\$284,635.25
<b>TOTAL (Rounded)<sup>e</sup></b>						<b>5,350</b>		<b>\$285,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing respondents that will be subject to Subpart KKK will be 291. This estimated average accounts for modified facilities after August 23, 2011 subject to Subpart KKK will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

<sup>b</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$73.46 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.50 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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> New respondents will become subject to 40 CFR Part 60, Subpart OOOOa.

<sup>d</sup> We have assumed that it will take the agency eight hours, two times per year to review semiannual reports.

<sup>e</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

**Table 2b: Average Annual EPA Burden and Cost - NSPS for Onshore Natural Gas Processing Plants (40 CFR Part 60, Subpart LLL) (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost <sup>b</sup>
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Review notification of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of modification <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of demonstration of CEMS <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review of CEMS demonstration report <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review of semiannual reports <sup>d</sup>	8	2	16	14	224	11	22	\$13,693.79
Review results of performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
<b>TOTAL (Rounded) <sup>e</sup></b>						<b>258</b>		<b>\$13,700</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing respondents that will be subject to Subpart LLL will be 14. This estimated average accounts for modified facilities after August 2, 2016 subject to Subpart LLL will become subject to 40 CFR Part 60, Subpart OOOOa and therefore, would no longer report under these rules.

<sup>b</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$73.46 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.50 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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> New respondents will become subject to 40 CFR Part 60, Subpart OOOOa.

<sup>d</sup> We have assumed that it will take the agency eight hours, two times per year to review semiannual reports.

<sup>e</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.