

ICR Summary Information

Hours per Respondent	22
Number of Respondents	91
Total Estimated Burden Hours	4,650
Total Estimated Costs	\$586,000
Annualized Capital O&M	\$0
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Natural Gas Transmission and St

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements ^c	2	1	2	91
B. Required activities	N/A			
C. Create information	N/A			
D. Gather existing information	4	1	4	91
E. Write Report				
i. Notification of construction/ reconstruction ^d	2	1	2	6
ii. Notification of actual startup ^d	2	1	2	6
iii. Notification of date of CMS performance evaluation ^d	2	1	2	6
iv. Notification of planned date of performance test ^d	2	1	2	6
v. Notification of compliance status report ^d	4	1	4	6
vi. Semiannual Periodic Report	4	2	8	91
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan activities ^d	16	1	16	6
C. Implement activities	N/A			
D. Develop record system				
i. Control equipment ^d	4	1	4	6
E. Time to enter information				
i. Control device design ^d	4	1	4	6
ii. Control equipment testing ^d	1	1	1	6
iii. Control equipment inspection	8	2	16	91
iv. Control equipment monitoring	1	2	2	91
v. Control device CMS	1	6	6	91
F. Time to train personnel	4	1	4	91
G. Perform Audits	N/A			
H. Retain records of actual throughput (facilities exempt under 63.1270(f) ^e	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^f				
Total Capital and O&M Cost (rounded) ^f				
GRAND TOTAL (rounded) ^f				

Assumptions:

^a We have assumed that there are approximately 85 respondents subject to the rule, on average over the three year period. becoming subject to the rule annually over the next three years, for a total of 91 respondents.

^b This ICR uses the following labor rates: \$163.17 per hour for Executive, Administrative, and Managerial labor; \$130.28 per hour for labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, Table 2. These rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the benefit package.

^c It is estimated that each source will familiarize themselves with the rule requirements each year.

^d One-time requirement for the 6 new or reconstructed sources. Performance test reports are submitted with the Notification and Electronic Reporting Tool (NERT) and submitted through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

^e Respondents are expected to maintain records of actual annual throughput as a standard business practice; therefore, there is no additional burden for this rule.

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

Storage (40 CFR Part 63, Subpart HHH) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
182	9.1	18.2	\$26,391.73
364	18.2	36.4	\$52,783.46
12	0.6	1.2	\$1,740.11
12	0.6	1.2	\$1,740.11
12	1	1	\$1,740.11
12	0.6	1.2	\$1,740.11
24	1.2	2.4	\$3,480.23
728	36.4	72.8	\$105,566.92
1,548			\$195,183
96	4.8	9.6	\$13,920.91
24	1.2	2.4	\$3,480.23
24	1.2	2.4	\$3,480.23
6	0.3	0.6	\$870.06
1456	72.8	145.6	\$211,133.83
182	9.1	18.2	\$26,391.73
546	27.3	54.6	\$79,175.19
364	18.2	36.4	\$52,783.46
3,103			\$391,236
4,650			\$586,000
			\$0
			\$586,000

Labor Rates	
Management	\$163.17
Technical	\$130.28
Clerical	\$65.71

22 hr/respons

It is estimated that 6 additional new or reconstructed sources

\$35.71 per hour for Technical labor, and \$65.71 per hour for Clerical Civilian Workers, by occupational and industry group. The wages available to those employed by private industry.

of Compliance Status and must be developed using EPA's (CEDRI).

There is no additional burden associated with these records under

Table 2: Average Annual EPA Burden and Cost – NESHAP for Natural Gas Transmission & Processing

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
Review reports				
a. Initial notification	2	1	2	6
b. Preconstruction review application	4	1	4	6
c. Performance test notification	2	1	2	6
d. Compliance status notification	4	1	4	6
e. Semiannual periodic reports	2	2	4	91
TOTAL (rounded) ^c				

Assumptions:

^a We assume that an average of 91 respondents (85 existing, 6 new) will be subject to this rule, and that one new source is added each year during the period of the ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and that the cost of the ICR is based on the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The benefit packages available to government employees.

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

and Storage (40 CFR Part 63, Subpart HHH) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
12	0.6	1.2	\$733.60
24	1.2	2.4	\$1,467
12	0.6	1.2	\$733.60
24	1.2	2.4	\$1,467.19
364	18.2	36.4	\$22,252.41
501			\$26,700

Labor Rates	
Management	\$73.46
Technical	\$54.51
Clerical	\$29.50

price will become subject to the rule each year over the three-year

Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical
 Clerical hours are 10 percent of Technical hours. These rates are
 : rates have been increased by 60 percent to account for the

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

gulations are labor costs. There are no capital/startup or operation and maintenance costs.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	6	1	0	6
Notification of actual startup	6	1	0	6
Notification of date of CMS performance evaluation	6	1	0	6
Notification of planned date of performance test	6	1	0	6
Notification of compliance status report ^a	6	1	0	6
Semiannual Periodic Report	91	2	0	182
			Total	212

^a Performance test reports are submitted with the Notification of Compliance Status and must be developed using EPA's Electronic Reporting Tool (ERT) and submitted through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports ^b	Number of Existing Respondents That Are Also New Respondents
1	6	79	0	0
2	6	85	0	0
3	6	91	0	0
Average	6	85	0	0

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

^b Column C does not apply as there are no existing respondents that are required to keep records only on an ann source determination is a one-time activity to determine rule applicability.

^c The previous (currently approved) ICR expires on 2/28/2025. Therefore, Year 1 of this ICR renewal correspond through February 2026.

(E)
Number of Respondents (E=A+B+C-D) ^c
85
91
97
91

ual basis since major

nds to March 2025