

U.S. Environmental Protection Agency

Information Collection Request

Title: Reconsideration of the Greenhouse Gas Reporting Program; Proposed Rule (September 2025)

OMB Control Number: 2060-NEW

EPA ICR Number: 7815.01

Abstract: In response to the FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110-161) and under authority of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) finalized a greenhouse gas reporting rule in October of 2009 (hereafter referred to as the “Greenhouse Gas Reporting Program” or GHGRP) (74 FR 56260; October 30, 2009). The rule, which became effective on December 29, 2009, requires reporting of greenhouse gases (GHGs) from certain large facilities and suppliers.

The GHGRP requires that certain sources emitting GHGs, suppliers of fuels or industrial gases, and sources that inject carbon dioxide (CO₂) underground, monitor and report GHG data and other relevant information. Subsequent rules have promulgated requirements for additional facilities and suppliers; provided clarification and corrections to existing requirements; and finalized confidential business information (CBI) determinations, amended recordkeeping requirements, and implemented an alternative verification approach.

This supporting statement addresses the removal of information collection activities as proposed under “Reconsideration of the Greenhouse Gas Reporting Program” (hereafter referred to as the “proposed reconsideration”). The EPA is proposing to remove the requirements of 40 CFR Part 98 for all source categories other than petroleum and natural gas systems and is also proposing to remove the natural gas distribution industry segment from the petroleum and natural gas systems source category (subpart W). For the remaining subpart W provisions and the subpart W-related requirements of the general provisions, the EPA is proposing to modify the years of applicability for reporting under subpart W to suspend reporting after reporting year (RY) 2024 until RY2034.

The proposed changes would revise the general provisions to modify the applicability of the rule to remove the data collection, monitoring, recordkeeping, and reporting requirements for all direct emitter, supplier, and carbon sequestration source categories after RY2024, with the exception of requirements specific to the petroleum and natural gas source category. The proposed amendments would remove and reserve the subpart-specific applicability, definitions, thresholds, calculation methodologies, monitoring and quality assurance requirements, missing data procedures, and recordkeeping and reporting requirements for all specified direct emitter, supplier source, and carbon sequestrations categories. The result of these proposed changes would be that mandatory reporting under the GHGRP would cease following RY2024. All segments of subpart W, except natural gas distribution would resume reporting obligations in RY2034. This information collection reflects the change in burden associated with the Reconsideration of the Greenhouse Gas Reporting Program; Proposed Rule. The proposed reconsideration is expected to result in a decrease in respondent burden.

The EPA previously submitted information collection requests (ICRs) on the GHGRP under Office of Management and Budget (OMB) 2060-0629, ICR No. 2300.20, a 2024 final rule under OMB 2060-0748, ICR No. 2773.02, and a 2024 final rule for subpart W under OMB 2060-0751, ICR No. 2774.02. This ICR reflects the proposed removal of requirements for existing reporters including burden from ICR No. 2300.20, ICR No. 2773.02, and ICR No. 2774.02. Once finalized and approved, this ICR will consolidate reporting requirements from EPA ICR number 2300.20, ICR No. 2773.02, and ICR No. 2774.02, and thus those ICRs will be discontinued. This information collection will affect approximately 8,971 respondents and result in an average annual burden of 0 hours and \$0 (\$2024) over the three years covered by this information collection, which includes an annual average of \$0 operation and maintenance costs. The annual average burden to the EPA for this period is anticipated at 0 hours and \$0 (\$2024) over the three years covered by this information collection. The proposed revisions to this information collection would result in an annual average burden and cost savings of 2,600,000 hours and \$303 million over the next three years, which includes an annual average of \$55.0 million in operation and maintenance costs.

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.

The EPA is proposing to remove regulatory obligations going forward for all non-subpart W sectors and the natural gas distribution segment, and to suspend reporting for subpart W until RY2034. These regulatory obligations were previously imposed under CAA section 114, which forms the basis of the GHGRP for most industry segments except subpart W starting in RY2034 under CAA section 136. The authority for this proposed action is CAA section 114 and the Agency's implied authority to reconsider prior actions taken under a grant of statutory authority. See the preamble section I.D of the proposed rule "Reconsideration of the Greenhouse Gas Reporting Program" for further discussion of EPA's legal authority for this action.

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.

The proposed reconsideration of the GHGRP would remove existing recordkeeping and reporting requirements going forward for affected sources in all non-subpart W sectors and the natural gas distribution segment of subpart W. It would also suspend the reporting requirements under subpart W until RY2034. For the last 15 years, the EPA has collected data from GHGRP sources. With limited exceptions, to date, the EPA has not proceeded with developing emissions standards that would apply to the majority of source categories reporting to the GHGRP. For example, GHGRP data from the petroleum and natural gas, municipal solid waste landfill, and carbon capture and sequestration source categories were previously analyzed to inform the development of new source performance standards (NSPS) and emission guidelines (EG) under CAA section 111 for oil and natural gas facilities (81 FR 35824; June 3, 2016), municipal solid waste landfills (81 FR 59332; August 29, 2016), and fossil-fuel fired electricity generating units (89 FR 39798; May 9, 2024); however, the EPA has not implemented standards for most additional source categories covered by the GHGRP. The EPA is not planning to develop such regulations at this time. Additionally, the information collected under the GHGRP is also

not necessary nor helpful to develop such regulations or to inform development of new source performance standards under CAA section 111, given the EPA's authority to collect such information on a more targeted and relevant basis through particularized CAA section 114 ICRs and other sources of information. This proposal does not prevent private companies from continuing to collect information on GHGs independently. Additionally, any other Federal, state, or local agencies or Tribes that may rely on the publicly available GHGRP data could utilize other more efficient and potentially more accurate methods for collecting the necessary information that are utilized throughout other parts of the Federal government (e.g., voluntary consensus standards). See the preamble section II.A of the proposed rule "Reconsideration of the Greenhouse Gas Reporting Program" for a complete discussion of the purposes and uses of this collection and the proposed amendments to the collection.

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.

The proposed reconsideration of this information collection does not require any new electronic collection techniques. The EPA previously established a central repository of data for all respondents, the web-based Electronic Greenhouse Gas Reporting Tool (e-GGRT). Respondents report data electronically, and the EPA stores the data in the database. Facilities and suppliers subject to the GHGRP register online through the e-GGRT system. The e-GGRT system has an XML reporting schema that allows facilities to upload GHG data directly in lieu of using the guided web forms provided through e-GGRT. The XML reporting schema contains all data elements needed to comply with the GHGRP. The electronic reports submitted under the GHGRP are subject to the provisions of 40 CFR Part 3, specifying EPA systems to which electronic submissions must be made and the requirements for valid electronic signatures. Additionally, e-GGRT is designed to collect and store CBI.

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.

The proposed reconsideration does not include any new reporting requirements to the GHGRP. Instead, the EPA is proposing to remove or suspend existing reporting requirements, and so the Agency anticipates that no duplication exists in this information collection.

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.

This information collection will not have a significant economic impact on a substantial number of small entities. The small entities directly regulated by the GHGRP include small businesses across all sectors of the economy encompassed by part 98, small governmental jurisdictions, and small non-profits. The proposed reconsideration would not have a significant economic impact on a substantial number of small entities because the proposed rule relieves regulatory burden on the small entities

subject to the rule. There are over 5,000 entities reporting across the sectors (including Natural Gas Distribution under subpart W–Petroleum and Natural Gas Systems) where the EPA is proposing to permanently remove requirements and approximately 2,800 entities reporting under subpart W (excluding Natural Gas Distribution) where the EPA is proposing to suspend reporting until 2034. The EPA anticipates that some of these would be small entities. The EPA’s analysis in past rules has found that small entities were likely subject to the requirements of the GHGRP for sources such as municipal solid waste landfills (subpart HH of Part 98) (78 FR 71904, November 29, 2013) or general stationary fuel combustion (subpart C of Part 98) (81 FR 89188, December 9, 2016). Removing requirements for reporting and recordkeeping for all non-W sectors and the natural gas distribution segment, or, in the case of subpart W, suspending reporting until RY2034 for all remaining subpart W segments, would relieve burden for all regulated entities, including small entities. The EPA has therefore concluded that this action would relieve regulatory burden for all directly regulated small entities.

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.

The proposed reconsideration would remove annual reporting requirements for the majority of GHGRP respondents, with the exception of most petroleum and natural gas facilities, where the EPA is proposing to suspend reporting until 2034. In this action, the EPA reviewed the source categories for which reporting is required under the GHGRP and considered whether ongoing data collection may continue to be useful to meet the Agency’s statutory obligations (e.g., for development of standards for similar source categories under the regulations enumerated in CAA section 114(a)). As discussed under section 2 of this document, the information collected under the GHGRP is not necessary nor helpful to develop such regulations, given the EPA’s authority to collect such information on a more targeted and relevant basis through particularized CAA section 114 ICRs and other sources of information. The EPA is not intending to use further continuous annual collection of reported data from numerous source categories, as such continuous collection is unnecessary to inform the EPA’s knowledge of these industry sectors, emissions, or trends at this time.

7. GENERAL GUIDELINES

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

This collection of information is consistent with all other OMB guidelines under 5 CFR 1320.5. This proposed revision to the collection does not add recordkeeping or reporting requirements but proposes to remove existing reporting requirements and to relieve the information collection burden.

8. PUBLIC COMMENT AND CONSULTATIONS

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.

A public notice is provided in the *Federal Register* notice of “Reconsideration of the Greenhouse Gas Reporting Program; Proposed rule”.

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.

To learn of ways to minimize burden on reporters, the EPA engages in consultations with reporters on a regular basis. The EPA communicates with GHGRP reporters directly after every data submission deadline during the annual verification period. The program maintains an open-door policy and has consulted on numerous occasions with trade associations as well as individual companies with issues or concerns.

To monitor the usefulness of this data collection, the GHGRP staff are in regular communication with other EPA programs that use the data, such as voluntary and mandatory GHG reduction programs within the Office of Air and Radiation. The EPA also consults regularly with state, local, and tribal environmental control agencies, environmental groups, research entities, and other nongovernmental organizations.

This proposed revision to the collection does not add recordkeeping or reporting requirements, but proposes to remove existing reporting requirements or, for subpart W sources, to suspend reporting requirements until RY2034 consistent with CAA section 136, and is anticipated to relieve the information collection burden for the majority of reporters.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payments or gifts are provided to respondents.

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.

This proposed revision to the collection does not add recordkeeping or reporting requirements or include determinations of confidentiality. This action proposes to remove or suspend the existing reporting requirements and to relieve the information collection burden.

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.

The revisions to calculation, monitoring, reporting and recordkeeping requirements in the proposed reconsideration 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.*
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The respondents in this information collection include owners and operators of facilities that comply with the GHGRP rule by reporting to the EPA their GHG emissions or the amount of GHGs they supply. To facilitate the analysis, the EPA has divided respondents into groups that align with the source categories identified in the proposed reconsideration. Because the requirements for petroleum and natural gas facilities are unchanged in the proposed reconsideration, these respondents and their associated burden are not included in this information collection.

This section lists the industry sectors (i.e., GHG source categories) that would cease reporting to the GHGRP. The data items required of program participants, and the activities in which participants must engage to collect, assess, and submit the required data items, are described in OMB 2060-0629, ICR No. 2300.20; OMB 2060-0748, ICR No. 2773.02; and OMB 2060-0751, ICR No. 2774.02.

12a. Respondents/NAICS Codes

Reporting facilities include, but are not limited to, those in the categories in which all must report, such as large emitters listed in Table A-3 of 40 CFR 98.2(a)(1), and those operating one or more source categories listed in Table A-4 of 40 CFR 98.2(a)(2) and that exceed the CO₂e threshold on a facility-wide basis or those supplier source categories listed in Table A-5. The proposed reconsideration would remove the reporting requirements for all reporting facilities, except for petroleum and natural gas systems.

Industry sectors are listed below by their corresponding subpart of the rule and their NAICS code for reference. The NAICS codes are not exhaustive but rather provide a list of facilities likely to be affected by the proposed reconsideration.

Table 1. Examples of Affected Entities by Category

Subpart	NAICS Codes	
C. General Stationary Fuel Combustion Sources	Facilities operating boilers, process heaters, incinerators, turbines, and internal combustion engines.
	211	Extractors of crude petroleum and natural gas.
	321	Manufacturers of lumber and wood products.
	322	Pulp and paper mills.
	325	Chemical manufacturers.
	324	Petroleum refineries, and manufacturers of coal products.
	316, 326, 339	Manufacturers of rubber and miscellaneous plastic products.
	331	Steel works, blast furnaces.
	332	Electroplating, plating, polishing, anodizing, and coloring.
	336	Manufacturers of motor vehicle parts and accessories.
	221	Electric, gas, and sanitary services.
	622	Health services.
	611	Educational services.
D. Electricity generation units that report through 40 CFR part 75	221112	Electric power generation, fossil fuel (e.g., coal, oil, gas).
E. Adipic Acid Production	325199	All other basic organic chemical manufacturing: Adipic acid manufacturing.
F. Aluminum Production	331313	Primary aluminum production.
G. Ammonia Manufacturing	325311	Anhydrous and aqueous ammonia manufacturing.
H. Cement Production	327310	Cement manufacturing.
I. Electronics Manufacturing	334111	Microcomputers manufacturing facilities.

Subpart	NAICS Codes	
	334413	Semiconductor, photovoltaic (PV) (solid-state) device manufacturing facilities.
	334419	Liquid crystal display (LCD) unit screens manufacturing facilities; Microelectromechanical (MEMS) manufacturing facilities.
K. Ferroalloy Production	331110	Ferroalloys manufacturing.
L. Fluorinated GHG Production	325120	Industrial gases manufacturing facilities.
N. Glass Production	327211	Flat glass manufacturing facilities.
	327213	Glass container manufacturing facilities.
	327212	Other pressed and blown glass and glassware manufacturing facilities.
O. Hydrochlorofluorocarbon (HCFC)-22 Production and Hydrofluorocarbon (HFC)-23 destruction processes that are not colocated with a HCFC-22 production facility and that destroy more than 2.14 metric tons of HFC-23 per year	325120	Industrial gas manufacturing: HCFC and HFC gases manufacturing.
P. Hydrogen Production	325120	Hydrogen manufacturing facilities.
Q. Iron and Steel Production	333110	Integrated iron and steel mills, steel companies, sinter plants, blast furnaces, basic oxygen process furnace (BOPF) shops.
R. Lead Production	331	Primary metal manufacturing.
S. Lime Manufacturing	327410	Lime production.
T. Magnesium Production	331410	Nonferrous metal (except aluminum) smelting and refining: Magnesium refining, primary.
U. Miscellaneous Uses of Carbonate	Facilities included elsewhere	
V. Nitric Acid Production	325311	Nitrogenous fertilizer manufacturing: Nitric acid manufacturing.

Subpart	NAICS Codes	
W. Petroleum and Natural Gas Systems	486210	Pipeline transportation of natural gas.
	221210	Natural gas distribution facilities.
	211120	Crude petroleum extraction.
	211130	Natural gas extraction.
X. Petrochemical Production	324110	Petrochemicals made in petroleum refineries.
Y. Petroleum Refineries	324110	Petroleum refineries.
Z. Phosphoric Acid Production	325312	Phosphatic fertilizer manufacturing.
AA. Pulp and Paper Manufacturing	322110	Pulp mills.
	322120	Paper mills.
	322130	Paperboard mills.
BB. Silicon Carbide Production	327910	Silicon carbide abrasives manufacturing.
CC. Soda Ash Production	325180	Other basic inorganic chemical manufacturing: Soda ash manufacturing.
DD. Electrical Equipment Use	221121	Electric bulk power transmission and control facilities.
EE. Titanium Dioxide Production	325180	Other basic inorganic chemical manufacturing: Titanium dioxide manufacturing.
FF. Underground Coal Mines	212115	Underground coal mining.
GG. Zinc Production	331410	Nonferrous metal (except aluminum) smelting and refining: Zinc refining, primary.
HH. Municipal Solid Waste Landfills	562212	Solid waste landfills.
	221320	Sewage treatment facilities.
II. Industrial Wastewater Treatment	221310	Water treatment plants.
LL. Suppliers of Coal-based Liquid Fuels	211130	Coal liquefaction at mine sites
MM. Suppliers of Petroleum Products	324110	Petroleum refineries.

Subpart	NAICS Codes	
NN. Suppliers of Natural Gas and Natural Gas Liquids	221210	Natural gas distribution facilities.
	211112	Natural gas liquid extraction facilities.
OO. Suppliers of Industrial Greenhouse Gases	325120	Industrial greenhouse gas manufacturing facilities.
PP. Suppliers of Carbon Dioxide	325120	Industrial gas manufacturing facilities.
QQ. Importers and Exporters of Pre-charged Equipment and Closed-Cell Foams	423730	Air-conditioning equipment (except room units) merchant wholesalers.
	333415	Air-conditioning equipment (except motor vehicle) manufacturing.
	423620	Air-conditioners, room, merchant wholesalers.
	449210	Electronics and Appliance retailers.
	326150	Polyurethane foam products manufacturing.
	335313	Circuit breakers, power, manufacturing.
	423610	Circuit breakers and related equipment merchant wholesalers.
RR. Geologic Sequestration	NA	CO ₂ geologic sequestration sites.
SS. Electrical Equipment Manufacture or Refurbishment	33531	Power transmission and distribution switchgear and specialty transformers manufacturing facilities
TT. Industrial Waste Landfill	562212	Solid waste landfill.
UU. Injection of Carbon Dioxide	211	Oil and gas extraction projects using carbon dioxide enhanced oil recovery.
	211111 or 211112	Projects that inject acid gas containing carbon dioxide underground.
VV. Carbon Dioxide Enhanced Oil Recovery Projects	211120	Oil and gas extraction projects using carbon dioxide enhanced oil recovery.
WW. Coke Calcining	299901	Coke; coke, petroleum; coke, calcined petroleum.

Subpart	NAICS Codes	
XX. Calcium Carbide Production	325180	Other basic inorganic chemical manufacturing: calcium carbide manufacturing.
YY. Caprolactam, Glyoxal, and Glyoxylic Acid Production	325199	All other basic organic chemical manufacturing.
ZZ. Ceramics Manufacturing	327110	Pottery, ceramics, and plumbing fixture manufacturing.
	327120	Clay building material and refractories manufacturing.

12b. Information Requested

Data Items

There are no data items under the proposed reconsideration. This proposed revision to the collection proposes to remove or suspend existing data reporting requirements. The existing data items and reporting requirements to be removed are described in OMB 2060-0629, ICR No. 2300.20, OMB 2060-0748, ICR No. 2773.02, and OMB 2060-0751, ICR No. 2774.02.

Reporting and Recordkeeping Requirements

There are no recordkeeping and reporting requirements under the proposed reconsideration. This proposed revision to the collection proposes to remove or suspend existing recordkeeping and reporting requirements. The existing recordkeeping and reporting requirements to be removed are described in OMB 2060-0629, ICR No. 2300.20, OMB 2060-0748, ICR No. 2773.02, and OMB 2060-0751, ICR No. 2774.02.

12c. Respondent Activities

There are no respondent activities associated with the proposed revisions to this information collection. This proposed revision to the collection proposes to remove or suspend existing data reporting requirements and any required respondent activities.

12d. Respondent Burden Hours and Labor Costs

This section presents the EPA's estimates of the burden and costs to respondents associated with the activities described in section 12b. The EPA estimates that, over the three years covered by this request, the average total respondent burden associated with this reporting will be 0 hours per year and the cost of all respondents of the information collection will be an average of \$0 per year, which includes \$0 in non-labor costs per year. The estimated total respondent burden will be reduced by 2,600,000 hours and \$303,000,000 per year.

Section 12d(i) of this ICR provides estimates of burden (hours) for all respondent types. Section 12d(ii) contains estimates of respondent costs for the information collection. Section 14 summarizes

federal burden and costs. Section 12d(iii) describes the respondent universe and the total burden and cost of this collection to respondents. Section 12d(iv) presents the bottom-line burden and cost. Section 15 provides reasons for any change in burden.

12d(i) Estimating Respondent Burden

Respondent burden estimates are presented in Exhibit 12.1. The EPA estimates that the total annual burden to all affected entities will decrease by 2,600,000 hours per year, on average, over the three years covered by this information collection.

Exhibit 12.1a of this document presents the aggregate and average annual respondent burden. Exhibit 12.1b of this document presents the reduced burden in hours, labor costs, operations and maintenance (O&M) costs, and total costs, based on the reduced (negative) number of respondents. All other numbers in Table 12.1b are also negative to represent the reduced burden. For the annual burden reduction by source category, see Exhibit 12.2. Note that the total cost numbers in Exhibit 12.1b are rounded to three significant figures and are the same for each of the three years after the rule is final.

Exhibit 12.1a. Summary of Annual Respondent Burden and Cost of Final Revisions for the Greenhouse Gas Reporting Rule

Year	Number of Respondents	Total Labor Hours	Labor Costs	Non-Labor Costs (Annualized Capital/Startup and O&M)	Total Costs
1	0	0	\$0	\$0	\$0
2	0	0	\$0	\$0	\$0
3	0	0	\$0	\$0	\$0
Total	0	0	\$0	\$0	\$0
3-Yr Annual Average	0	0	\$0	\$0	\$0

Exhibit 12.1b. Summary of Reduced Annual Respondent Burden and Cost of Final Revisions for the Greenhouse Gas Reporting Rule

(Values in parentheses indicate negative values)

Year	Number of Respondents	Total Labor Hours	Labor Costs	Non-Labor Costs (Annualized Capital/Startup and O&M)	Total Costs
1	(8,971)	(2,596,244)	(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
2	(8,971)	(2,596,244)	(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
3	(8,971)	(2,596,244)	(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
Total (rounded)	(26,900)	(7,790,000)	(\$743,000,000)	(\$165,000,000)	(\$908,000,000)
3-Yr Annual Average (rounded)	(8,970)	(2,600,000)	(\$248,000,000)	(\$55,000,000)	(\$303,000,000)

12d(ii) Estimating Respondent Costs

The burden of the current reporting requirements for the 2025 reporting year were estimated to serve as a baseline for estimating the reduced burden resulting from the proposed reconsideration in the following manner:

1. The burden estimate from the most recent ICR renewal 2300.20, Exhibit 6.1, was used for the burden of the GHGRP as of 2024 for annual reporting in 2025 for all subparts. These values included for each subpart the number of respondents per year, the number of responses per respondent, and the technical, managerial, clerical, and legal hours per year, the total labor cost, and the O&M costs and the total costs. These values were converted to the average hours and dollars per respondent (Table 1 of Attachment 1). The activities for each respondent for each subpart are documented in the supporting statement for OMB 2060-0629, ICR No. 2300.20.

2. The GHGRP was broadly amended in 2024, which revised some reporting requirements, revised global warming potentials (GWP), and added several new subparts. The incremental burden of these amendments in the 2024 final rule were documented in OMB 2060-0748, ICR 2773.02. For the estimate of burden from all subparts except W, the incremental burden for reporting in 2025 was selected from Table 1 (Year 1 - 2025) including the number of respondents, the technical, managerial, clerical, and legal hours per year, and the total O&M costs. The activities for each respondent for each subpart are documented in the supporting statement for ICR 2773.02. The incremental burden was converted to the average hours and dollars per respondent using the same number of respondents as in step 1; the incremental number of respondents included in ICR 2773.02 was not used to calculate the average per respondent because it would overestimate the burden when applied to all respondents (Table 2 of Attachment 1).

3. The total hours per respondent per labor category and the total O&M cost per respondent for all non-W sectors are equal to the sum of the values per respondent from steps 1 and 2, above (Table 3

of Attachment 1). That is, the sum of the average hours per respondent for each labor category and the sum of the average O&M costs per respondent, and the sum of the total average costs per respondent from ICR 2300.20 and ICR 2773.02 for each subpart in the GHGRP were estimated to calculate the adjusted costs to all non-subpart W sectors from the 2024 final rule amendments.

4. For subpart W, the baseline burden was estimated on an industry segment basis according to the burden from the most recent ICR renewal 2300.20, the incremental burden of the GWP amendments in the 2024 final rule (OMB 2060-0748, ICR 2773.02), and the incremental burden from additional amendments from the 2024 final rule for subpart W, which revised the petroleum and natural gas source category to base reporting requirements on empirical data and accurately reflect total methane emissions and waste emissions from applicable facilities (OMB 2060-0751, ICR No. 2774.02). The incremental burden from ICR renewal 2300.20 was converted to the average hours and dollars per respondent per industry segment (Table 5 of Attachment 1). The activities for each respondent in each segment are documented in the supporting statement for OMB 2060-0629, ICR No. 2300.20. The incremental burden applicable to subpart W from ICR 2773.02 only accounts for the burden to new facilities and does not include any burden associated with revisions to W reporting requirements, which were unchanged in ICR 2773.02. Therefore, the adjustments to burden for W reporters included from ICR 2773.02 is only to adjust the total number of respondents to add 188 reporters. The incremental burden applicable to each industry segment to subpart W from the 2024 final amendments to subpart W, including the total number of new respondents, total hours per labor category and the total O&M costs by industry segment, were obtained from ICR No. 2774.02, Table A-1 to Appendix A ("Subpart W Labor Costs by Emission Source/Event and Industry Segment"). This burden was converted to the average hours and dollars per respondent per industry segment (Table 6 of Attachment 1).

5. For subpart W, for each industry segment, the total hours per respondent per labor category and the total O&M cost per respondent are equal to the sum of the values per respondent from ICR Nos. 2300.20 and 2774.02. That is, the sum of the average hours per respondent for each labor category for each industry segment and the sum of the average O&M costs per respondent for each industry segment, and the sum of the total average O&M costs per respondent for each industry segment were used to calculate the adjusted costs to subpart W from the 2024 final rule amendments.

6. The number of respondents impacted per each non-W subpart was updated to reflect the most recent 2023 reporting year data that were in EPA's on-line Facility Level Information on GreenHouse gases Tool (FLIGHT) and to reflect additional new reporters from the 2024 final rule amendments. For subpart W, the total number of reporters was taken from the PNGS sector summary for 2023 and adjusted to reflect additional new reporters in each industry segment from both 2024 final rules (ICR No. 2773.02 and ICR No. 2774.02). For new subparts, the EPA retained the number of respondents estimated from the 2024 final rule amendments.

7. The EPA estimated the number of labor hours by subpart by multiplying the updated number of respondents by calculated hours per respondent in each labor category and summed them for the total number of hours per subpart. For subpart W, the EPA estimated the number of labor hours by industry segment by multiplying the updated number of respondents in each segment by calculated hours per respondent in each labor category and summed them for the total hours per segment.

8. The EPA adjusted the total O&M costs per subpart (and for subpart W, by industry segment) by multiplying the updated number of respondents by the adjusted total O&M cost per respondent. For O&M costs, the EPA adjusted the costs from \$2021 to \$2024 using the annual Chemical Engineering Plant Cost Index (CEPCI) values for 2021 (708) and 2024 (796.2), which resulted in a multiplier of 1.124 (i.e., $796.2/708 = 1.124$). Baseline costs to respondents associated with the current information collection include labor costs (i.e., the cost of labor by facility staff to meet the rule's information collection requirements) and non-labor costs (e.g., the cost of purchasing and installing monitoring equipment or contractor costs associated with providing the required information, and O&M costs of equipment needed to collect information). These baseline costs represent the potential reduced burden as a result of no longer having to collect this information under this proposed reconsideration. These baseline costs are included in Tables 4 and 7 of Attachment 1.

To calculate labor costs, the EPA used an approach consistent with the ICR associated with the GHGRP currently approved by OMB, updated to incorporate 2024 BLS labor rates. For all subparts except subparts W and RR (Geologic Sequestration of Carbon Dioxide), the labor rates are: \$82.63 for technical workers, \$98.94 for managers, \$36.83 for clerical support, and \$139.96 for legal support. Sector-specific labor rates are used for subparts W and RR: \$141.14 for senior managers, \$151.15 for middle managers, \$131.28 for engineers, \$79.83 for technicians, and \$166.96 for legal support. These labor rates, which also include benefits and overhead, were applied to the total burden estimates for each labor category to obtain the total costs for each subpart. Labor and non-labor costs (capital and O&M) for all subparts are summarized in Exhibit 12.1. These labor and non-labor costs, as well as additional detail regarding the calculation methodology for the final revisions are presented in more detail in the Impacts Memorandum.

The EPA estimates that the total annual reduced costs to all affected reporting entities would be \$303 million per year as a result of the proposed reconsideration. Exhibit 12.2 presents the annual average burden and cost reductions for each source category for which a burden decrease is anticipated over the first three years of the information collection.

Exhibit 12.2. Annual Burden Reduction Over the First Three Years of the Information Collection, by Source Category

Source Category	Number of Respondents	Total Burden Reduced (hrs)	Total Reduced Labor Cost (\$/year)	Total Reduced O&M Cost (\$/year)	Total Cost Savings (\$/year)
C. Stationary Combustion (C only)	1,813	76,007	\$6,200,357	\$2,151,529	\$8,351,887
C-plus at least one other subpart	3,587	155,900	\$12,723,325	\$3,878,496	\$16,601,821
D. Electricity Generation	1,086	4,996	\$387,166	\$67,171	\$454,336
E. Adipic Acid Production	2	44	\$3,660	\$6,880	\$10,541
F. Aluminum	7	446	\$37,440	\$5,028	\$42,468

Production					
G. Ammonia Manufacturing	29	1,237	\$102,205	\$160,854	\$263,059
H. Cement Production	90	2,209	\$172,971	\$5,567	\$178,537
I. Electronics Manufacturing	47	11,454	\$939,466	\$299,345	\$1,238,810
K. Ferroalloy Production	8	316	\$26,618	\$495	\$27,113
L. Fluorinated Greenhouse Gas Production	15	12,594	\$1,006,509	\$928	\$1,007,437
N. Glass Production	102	4,940	\$406,936	\$12,930	\$419,867
O. HCFC-22 Production and HFC-23 Destruction	5	570	\$46,027	\$309	\$46,336
P. Hydrogen Production	115	4,900	\$398,516	\$58,907	\$457,422
Q. Iron and Steel Production	121	2,934	\$245,313	\$143,056	\$388,369
R. Lead Production	11	273	\$23,229	\$14,350	\$37,579
S. Lime Manufacturing	68	1,910	\$161,542	\$4,206	\$165,748
T. Magnesium Production	8	144	\$11,931	\$495	\$12,426
U. Misc. Uses of Carbonate	6	54	\$4,197	\$371	\$4,568
V. Nitric Acid Production	28	907	\$75,317	\$258,224	\$333,542
W. Petroleum and Natural Gas Systems	3,000	2,148,942	\$210,845,768	\$44,955,344	\$255,801,112
X. Petrochemical Production	74	11,065	\$892,178	\$145,728	\$1,037,906
Y. Petroleum Refineries	122	6,726	\$553,408	\$3,522	\$556,931
Z. Phosphoric Acid Production	9	90	\$7,555	\$557	\$8,111
AA. Pulp & Paper Manufacturing	98	2,785	\$231,469	\$29,426	\$260,894
BB. Silicon Carbide Production	1	16	\$1,178	\$285	\$1,462
CC. Soda Ash	4	37	\$2,855	\$2,506	\$5,361

Manufacturing					
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	82	3,652	\$291,184	\$130,545	\$421,729
EE. Titanium Dioxide Production	6	92	\$6,929	\$3,043	\$9,973
FF. Underground Coal Mines	58	4,023	\$329,186	\$55,429	\$384,615
GG. Zinc Production	6	191	\$16,122	\$10,438	\$26,561
HH. Landfills	1,131	74,147	\$5,969,330	\$2,243,666	\$8,212,996
II. Wastewater	120	3,841	\$322,374	\$186,768	\$509,142
LL. Suppliers of Coal-based Liquid Fuels	1	22	\$1,824	\$62	\$1,886
MM. Suppliers of Petrol. Production	274	10,576	\$876,515	\$16,947	\$893,462
NN. Supplies of Nat Gas and Nat Gas Liquids	522	8,786	\$735,287	\$32,287	\$767,574
OO. Suppliers of Industrial GHG	150	14,309	\$1,187,658	\$9,380	\$1,197,038
PP. Suppliers of CO2	160	2,095	\$168,618	\$9,896	\$178,515
QQ - Imports and Exports of Fluorinated GHGs in Products	57	3,653	\$296,777	\$3,526	\$300,302
RR. Geologic Sequestration of Carbon Dioxide	19	7,820	\$1,042,965	\$41,974	\$1,084,939
SS - SF6 Equipment Producers	5	240	\$19,607	\$309	\$19,916
TT -Industrial Landfills	162	8,812	\$716,150	\$10,088	\$726,238
UU. Injection of Carbon Dioxide	79	1,003	\$80,755	\$4,759	\$85,514
VV. Geologic Sequestration of CO2 with EOR	2	27	\$2,084	\$140	\$2,224
WW. Coke Calciners	15	504	\$42,500	\$22,097	\$64,597

XX. Calcium Carbide Production	1	38	\$3,200	\$70	\$3,270
YY. Caprolactam, Glyoxal, and Glyoxylic Acid Production	6	166	\$13,747	\$421	\$14,167
ZZ. Ceramics Production	25	753	\$63,767	\$1,754	\$65,521
Totals	8,971	2,596,244	\$247,693,715	\$54,990,106	\$302,683,821
Totals (Rounded)	--	2,600,000	\$248,000,000	\$55,000,000	\$303,000,000

The total number of respondents is less than the sum of the respondents for each subpart because many respondents report under multiple subparts.

12d(iii) Estimating the Respondent Universe and Total Burden and Costs

The estimated number of respondents in each subpart who will no longer be expected to report and perform the required activities under this information collection as a result of the proposed reconsideration is presented Exhibit 12.2. There are no required activities or sector-specific reporting requirements, as described above in sections 12b and 12c. The number of respondents subject to the required activities was estimated separately for each subpart, and in situations where a facility reports under multiple subparts, the facility was counted once per subpart (e.g., facilities that report emissions under both subpart P and subpart C were counted as separate facilities under each subpart). As a result, the actual total number of respondents that will perform the required activities for each year across all subparts is lower than the sum of the respondents for each subpart.

12d(iv) Bottom Line Burden Hours and Costs

The bottom-line burden hours are 0 and the bottom-line costs are \$0 for the proposed reconsideration because the respondents included in the proposed reconsideration (including all respondents except those subject to subpart W), will no longer need to report their annual GHG emissions. The reduction in burden hours over the next three reporting years are shown in Exhibit 12.3.

Exhibit 12.3. Bottom Line Annual Burden and Cost

(All labor hour and dollar values are in parentheses to indicate that they represent negative values; i.e., burden reduction and cost savings)

	Year 1 (2026)	Year 2 (2027)	Year 3 (2028)	Total	Annual Average
Respondent Costs					
Number of Respondents	8,971	8,971	8,971	(N/A)	8,971
Total Respondent Labor Hours	(2,596,244)	(2,596,244)	(2,596,244)	(7,788,733)	(2,596,244)
Total Respondent Labor Costs	(\$247,693,715)	(\$247,693,715)	(\$247,693,715)	(\$743,081,144)	(\$247,693,715)
Non-labor (Capital and O&M) Costs	(\$54,990,106)	(\$54,990,106)	(\$54,990,106)	(\$164,970,318)	(\$54,990,106)
Total Respondent Costs	(\$302,683,821)	(\$302,683,821)	(\$302,683,821)	(\$908,051,463)	(\$302,683,821)
Agency Costs		0	0		
Total Agency Burden Hours	(10,400)	(10,400)	(10,400)	(31,200)	(10,400)
Total Agency Labor Costs	(\$705,744)	(\$705,744)	(\$705,744)	(\$2,117,232)	(\$705,744)
Total Agency Non-Labor Costs	(\$3,900,000)	(\$3,900,000)	(\$3,900,000)	(\$11,700,000)	(\$3,900,000)
Total Burden Hours (Respondents + Agency)	(2,606,644)	(2,606,644)	(2,606,644)	(7,819,933)	(2,606,644)
Bottom Line Costs (Respondents + Agency)	(\$307,289,565)	(\$307,289,565)	(\$307,289,565)	(\$921,868,695)	(\$307,289,565)

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.

See section 12 above.

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

EPA activities include the monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation. This ICR reflects an incremental agency burden for program operation activities, which include monitoring and verification of emission reports. The incremental agency burden under the proposed reconsideration is \$0. The proposed revision to the collection proposes to remove or suspend existing data reporting requirements and the data submitted to the Agency. The proposed reconsideration would reduce the agency labor hours and non-labor costs from the withdrawal of all reporting non-W sectors and the natural gas distribution segment of subpart W, as well as the proposed suspension of reporting for remaining industry segments of subpart W until RY2034.

14b. Agency Labor Cost

This section describes the burden and cost to the Federal government associated with this information collection, and the details are provided in Attachment 1. Federal activities under this information collection include EPA oversight of the reporting program.

EPA activities associated with the GHGRP include oversight and implementation of the reporting program, e.g., monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation. There are no labor costs to the Federal government associated with the rule changes included in this information collection. The proposed revision to the collection reflects the proposal to remove existing data reporting requirements and the data submitted to the Agency, reducing the time required for oversight and implementation of the program.

The current total burden and costs to the Federal government for the GHGRP is estimated to be 12 full time employees (FTE), or 2,080 hours per year per employee. The proposed reconsideration would remove the reporting requirements for all subparts except subpart W and reduce the burden by 5 FTEs to administer the program to 7 FTEs for the remaining program. Exhibit 14.1 presents the annual Agency burden and cost reduction.

To develop EPA labor costs, the EPA estimated the average hourly labor rate for salary and overhead and benefits for Agency staff to be \$67.86. To derive this figure, the EPA multiplied the hourly compensation at GS-13, Step 1 on the 2024 GS pay scale (\$42.41) by the standard government benefits multiplication factor of 1.6 to account for overhead and benefits.¹

Exhibit 14.1 Annual Agency Burden and Cost Reduction

Information Collection Activity	Annual Responses	Total Annual Burden (hours) ¹	Labor Cost (2024\$) ²	Non-Labor Cost (2024\$) ³	Total Annual Cost (2024\$) ⁴
Developing Guidance, Conducting Training, Audits, and General Oversight	1	(10,400)	\$(705,744)	\$(3,936,017)	\$(4,641,761)
Totals (Rounded)			\$(706,000)	\$(3,940,000)	\$(4,640,000)

¹10,400 hours is calculated based on a reduction of five FTEs working 80 hours per two-week pay period, for 26 pay periods per year (5 x 80 x 26 = 10,400).

²The labor cost is based on the hour compensation at GS-13 step 1 on the 2024 pay scale: \$42.21 x 1.6 to account for overhead and benefits = \$67.86. 10,400 x \$67.86 = \$705,744.

³Non-labor costs cover the development of guidance, training, responding to stakeholders, communications and outreach, database maintenance, and other contractor support. Non-labor costs for the GHGRP were estimated to be \$8,400,000 (2021\$) in the current GHGRP, and the EPA assumed they would be reduced by 5/12 of the current amount, and were then scaled from 2021\$ to 2024\$ using the annual CEPCI.

⁴Total Annual Cost = Labor Cost + Non-Labor Cost: \$705,744 + \$3,900,000 = \$4,641,761. These costs are negative because they result from a reduction in burden and associated non-labor costs.

14c. Agency Non-Labor Costs

Non-labor costs to the Federal government associated with the proposed reconsideration included in this information collection are expected to be zero. The proposed revision to the collection reflects the proposal to remove existing data reporting requirements and the data submitted to the Agency, reducing the need for non-labor costs to implement the program. The reduction is presented in Exhibit 14.1.

15) REASONS FOR CHANGE IN BURDEN

¹ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf

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

This section presents the change in burden based on the proposed revisions. This proposed rule would result in an overall average annual burden of 0 hours and \$0 over the three years covered by this information collection.

The total decrease in costs from all proposed revisions includes an annual average cost savings of \$303,000,000. These costs include an annual average non-labor cost savings of \$55,000,000 and \$248,000,000 savings in labor costs. The decrease in burden and non-labor costs is based on the change in the applicability and reporting requirements for 8,971 reporters. The proposed changes would revise the general provisions to modify the applicability of the rule to remove the data collection, monitoring, recordkeeping, and reporting requirements for all non-W direct emitter, supplier, and carbon sequestration source categories after RY2024. For those subpart W provisions, the EPA is proposing to permanently remove reporting requirements for the natural gas distribution segment, and is proposing to modify the years of applicability for reporting for all other industry segments under subpart W to suspend reporting after RY2024 until RY2034. The proposed amendments would remove and reserve the subpart-specific applicability, definitions, thresholds, calculation methodologies, monitoring and quality assurance requirements, missing data procedures, and recordkeeping and reporting requirements for all specified direct emitter, supplier source, and carbon sequestrations categories and the natural gas distribution sector. The result of these proposed changes would be that mandatory reporting under the GHGRP would cease following RY2024, except for most sources in the petroleum and natural gas source category, which would not be required to resume reporting until RY2034. Overall, the final revisions would result in a decrease in burden and costs.

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.

The GHGRP was developed to collect comprehensive and accurate data to inform future climate policy development and support a range of possible policies and regulations, as discussed in section 2 of this document. The GHG data reported under the GHGRP, except for that data determined to be eligible for confidential treatment, are accessible to the public via the EPA's online data publication tool, also known as FLIGHT (Facility Level Information on Greenhouse gases Tool) at: <https://ghgdata.epa.gov/ghgp/main.do>. FLIGHT allows users to view and sort GHG data for every reporting year starting with 2010 in a variety of ways including by location, industrial sector, and type of GHG emitted. To support the needs of data users, the GHGRP data is made available for download through Envirofacts (<https://www.epa.gov/enviro/>), a cross-EPA data publication website.

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.

The agency will display the expiration date for this information collection.

18) CERTIFICATION STATEMENT

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

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.