

SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)
(Proposed Rule)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), EPA ICR Number 2439.01, OMB Control Number 2060-NEW. Once approved the burden in this ICR will be transferred to the existing series for subpart HHH (2060-0418).

1(b) Short Characterization/Abstract

The burden in this ICR is a result of the review of the existing The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH) as required by the Clean Air Act. The NESHAP for Natural Gas Transmission and Storage, published at 40 CFR part 63, subpart HHH, were proposed on February 6, 1998 and promulgated on June 17, 1999. These regulations apply to existing facilities and new facilities that are major sources of hazardous air pollutants (HAP) and that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart HHH.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The proposed rulemaking would amend title 40, chapter I, part 63 subpart HHH to

include, emission sources for which standards were not previously developed. We are proposing standards for these emission sources pursuant to CAA section 112(d)(2) and (3). Therefore, the number of affected facilities under this subpart is expected to increase. The estimates of the size of the regulated universe are based on information obtained from the National Emissions Inventory (NEI) database. Overall, EPA estimates that approximately 53 respondents would be subject to the regulation. Labor costs were also updated in this ICR to reflect current burden on industry and the Agency. EPA assumes that there is an average of one affected facility per plant (i.e., respondent). EPA estimates that the annual cost of this information collection will be \$0 for non-labor and \$86,823 for labor, based on a labor burden of 2,591 hours.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

- establish and maintain such records;
- make such reports;
- install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- 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);
- keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- submit compliance certifications in accordance with Section 114(a)(3); and

- provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from natural gas transmission and storage facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart HHH.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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 the emission standard. Continuous emission monitors are used to ensure compliance with the standard 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 the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the 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 the standard is being met. The performance test may also be observed.

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

The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

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 the delegated state

or local agency. If a state or local agency has adopted its own similar 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, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

EPA will solicit public comment by means of a Federal Register Notice of Proposed Rulemaking.

3(c) Consultations

During earlier ICRs, EPA contacted the American Petroleum Institute (API), the American Gas Association (AGA), and the Interstate Natural Gas Association of America (INGAA) to determine whether it would be possible for the Agency to reduce the recordkeeping and reporting burden or improve the language in the standards to facilitate industry compliance. EPA also solicited information about the size, growth, and other characteristics of the regulated industry. API declined to provide comments on the NESHAP. EPA did not receive a response from AGA or INGAA.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications, for at least 5 years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the Part 70 permit program and the five year statute of limitations on which the permit program is based. The retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate

level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

3(f) Confidentiality

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).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents, SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners/operators of natural gas transmission and storage facilities. NAICS (The North American Industry Classification System) 48621 and 22121, for Pipeline Transportation of Natural Gas and Natural Gas Distribution, respectively.

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by the NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH). Respondents have the opportunity to use to use monitoring equipment that automatically records parameter data to alleviate burden. Under this provision, it would be required to transmit reports and data electronically.

A source must make the following reports:

Notification Reports	
Initial notification that a source is subject to the provisions in subpart HHH.	63.9(b)(2), 63.1274(a), 63.1285(b)(1) and (b)(2)
Notification of the date of a performance test.	63.7(b) and (c), 63.8(e)(2), 63.9(e), 63.9(g)(1), 63.1274(a), 63.1285(b)(3)
Notification of Compliance Status Report, including the results of any continuous monitoring system performance evaluations and inspection results.	63.9(h), 63.1270(d), 63.1274(a), 63.1283(c)(2)(ii)(A), 63.1285(b)(4), 63.1285(d)(1) through (d)(10)
Notification of change in compliance demonstration methods for control device performance (submit with Periodic Report).	63.1282(e)
Performance test results for closed-vent systems using flares as the control device (submit with Notification of Compliance Status Report).	63.7(g), 63.10(d)(2), 63.1274, 63.1282(d)(3), 63.1285(d)(2)
Design analysis documentation, including operating parameters and calculations, for closed-vent systems using control devices other than flares (submit with Notification of Compliance Status Report).	63.1274, 63.1282(d)(4), 63.1285(d)(4)(i) through (d)(4)(iii)
One complete test report for each test method used for a particular source (submit with Notification of Compliance Status Report).	63.1285(d)(3)
Analysis demonstrating whether an affected source is a major source (submit with Notification of Compliance Status Report).	63.1285(d)(8)
Statement of compliance with subpart HHH (submit with Notification of Compliance Status Report).	63.1285(d)(9)
Notification of any process change.	63.1285(f)
Application for approval of construction or reconstruction.	63.5(d)(1), 63.1274(a)
Notification of intent to construct or reconstruct.	63.9(b)(5)(i), 63.9(d)(4)(i), 63.1274(a)
Notification of actual date of startup.	63.9(b)(4)(v), 63.9(b)(5)(ii), 63.1274(a)

Notification Reports	
Results of performance evaluation.	63.8(e)(5), 63.10(e), 63.1274(a)
Notification of special compliance requirements.	63.9(d), 63.1274(a)
Semiannual Periodic Reports.	63.10(e), 63.1274(a), 63.1285(e)
Report to demonstrate compliance with benzene emission limit (alternative standards) (submit with Notification of Compliance Status Report).	63.1285(d)(7)
Analysis that demonstrates conditions under which the facility reduces 95.0 percent of its HAP emissions (submit with Notification of Compliance Status Report).	63.1281(e)(2), 63.1285(d)(10)
Semiannual HAP summary report.	63.10(e)(3)(vi), 63.1274(a)
Semiannual excess emissions and continuous monitoring system performance report.	63.9(c)(8), 63.10(e)(3), 63.1274(a)

A source must keep the following records:

Recordkeeping	
Records for each monitoring system including documentation of incidents such as breakdowns, repairs, calibration checks, and other down time.	63.10(b)(2), 63.10(c), 63.1272(d), 63.1274(a), 63.1283(d), 63.1284(b)(3)
Continuous records of equipment operating parameters and daily average values of the parameters.	63.1284(b)(4)(i) and (ii)
Records of the times and duration of all periods during which pilot flames are absent.	63.1284(b)(4)(ii), 63.1284(e)(3)
Records of flow indicator operation, detection, and vent stream diversions.	63.1284(b)(4)(iii)
Records of inspections of seals or closure mechanisms and records of broken or changed seals, valves, or locks.	63.1284(b)(4)(iv)
Continuous monitoring system quality control program.	63.8(d), 63.1274(a)
Records pertaining to the inspection of closed-vent systems including maintenance, leaks, repairs, delays, and shutdowns. This also applies to parts that are difficult or unsafe to inspect and those where a leak or defect is detected.	63.1283(c)(3) through (c)(7), 63.1284(b)(5) through (8)
Records of glycol dehydration unit baseline operations, throughput quantity, and emissions information.	63.1281(e)(1) and (e)(2), 63.1284(b)(9) and

Recordkeeping	
	(10), 63.1284(d)
Records of compliance with benzene emission limit (alternative standards).	63.1281(e)(2), 63.1284(c)
Throughput and emissions records of exempt glycol dehydration units.	63.1274(c) and (d), 63.1284(d)
Records of flare design and emissions.	63.1284(e)
Records of leak or defect detection, severity (maximum instrument reading), and date of repair.	63.1284(b)(7) and (b) (8)
Site-specific performance evaluation test plan.	63.7(c)(2), 63.8(d)(2), 63.8(e)(3)(i), 63.1274(a)
Record of results of performance test.	63.7(g)(3), 63.1274(a)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate closed vent systems and CMS to: 1) achieve a 95% reduction in HAP, TOC, or total HAP, for control devices and vapor recovery devices; 2) achieve a reduction to 20 ppm of TOC or total HAP, and operates at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius for combustion devices.
Perform initial performance test, using the procedures listed in 40 CFR 63.1282(d), 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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

The rule does not require use of information collection techniques such as automated, mechanical, or other technical collection techniques. Electronic submissions of reports are required.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Analyze, and maintain data in CDX

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. 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 or operator for 5 years.

Information contained in the reports will be required to submit records electronically to EPA's Central DATA Exchange (CDX) using the Electronic Reporting Tool. The Central Data Exchange (CDX) enables fast, efficient and more accurate environmental data submissions from state and local governments, industry and tribes to the Environmental Protection Agency (EPA) and participating program offices. EPA's CDX is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data submissions to the Agency. CDX works with both EPA program offices looking for a way to better manage incoming data, and stakeholders looking for a way to reduce burden from reporting

requirements.

5(c) Small Entity Flexibility

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 the regulation. 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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Specific tasks and major assumptions have been identified where appropriate. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,591 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments previously received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates: \$33.51 per hour for technical labor,

\$52.85 per hour for management labor, and \$23.43 for clerical labor. The rates have already been increased by 110 percent to account for the benefit packages available to those employed by private industry. These rates are from the *Employer Costs for Employee Compensation Historical Listing March 2004 – December 2010* published by the Bureau of Labor and Statistics and represents the state of the industry in 2008, consistent with the control costs associated with the proposed revisions (Source: <ftp://ftp.bls.gov/pub/special.requests/ocwc/ect/ececqrtn.pdf>).

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operations and maintenance (O&M) costs incurred as a result of this standard because the industry has primarily installed flares to control emissions. The only continuous monitoring required for a flare is the monitoring of the presence of the pilot flame, which is a requirement for proper operation of a flare under 40 CFR 63.11(b)(5).

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulation is the cost of labor. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 \$17,545. This cost is based on the average hourly labor rate as follows:

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

Managerial \$59.63 (GS-13, Step 5, \$37.27 + 60%)

Technical \$47.20 (GS-12, Step 1, \$29.50 + 60%)

Clerical \$23.94 (GS-6, Step 3, \$14.96 + 60%)

These rates are from the Office of Personnel Management (OPM), 2008 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. Costs have been estimated in 2008

dollars for this ICR to be consistent with other costs (i.e. control devices) estimated in the development of the proposed revisions. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Approximately 36 existing respondents and an additional 17 new respondents will be subject to the reporting requirements for this NESHAP. The new respondents consist of 2 new facilities and 15 existing facilities. The overall average number of respondents, as shown in the table below, is 53 per year over the 3 year period. This estimate was determined based on methodology outlined in the previous ICR, in addition to research necessary to conduct the revision of the current rule.

The number of respondents is calculated using the following table, which addresses the three years covered by this ICR.

Year	Respondents That Submit Reports		(C) Number of New Respondents That Are Existing Sources	(E) Number of Respondents (E=A+B)
	(A) Number of New Respondents	(B) Number of Existing Respondents		
1	17	19	15	36
2	17	36	15	53
3	17	53	15	70
Avg	17	36	15	53

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondent s	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of intent to construct or reconstruct	17	1	N/A	17
Notification of actual date of startup	17	1	N/A	17
Notification of date of continuous monitoring system performance evaluation	17	1	N/A	17
Notification of planned date of performance test	17	1	N/A	17
Notification of Compliance Status Report	17	1	N/A	17
Semiannual Reports	36	2	N/A	72
			Total	157

The number of Total Annual Responses is 157.

The total annual labor costs are \$86,823. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 400 labor hours at a cost of \$17,545. See Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$86,823. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next 3 years is estimated to be 400 labor hours at a cost of \$17,545. See Table 2: Annual Agency Burden and Cost, NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH), attached.

6(f) Reasons for Change in Burden

The number of affected facilities under this subpart is expected to increase based on the inclusion of previously unregulated sources pursuant to CAA section 112(d)(2) and (3). In addition, labor costs have been updated.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2010-0505. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center Docket is (202) 566-1742. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2010-0505 and OMB Control Number 2060-NEW in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1. Annual Respondent Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Applications	Not applicable							
2. Survey and Studies	Not applicable							
3. Reporting Requirements								
a. Read instructions	1	1	1	36	36	1.8	3.6	1,386
b. Required activities	Not applicable							
c. Create information	Not applicable							
d. Gather existing information	2	1	2	36	72	3.6	7.2	2,772
e. Write reports								
i. Notification of construction/ reconstruction	1	1	1	17	17	0.85	1.7	654
ii. Notification of actual startup	1	1	1	17	17	0.85	1.7	654
iii. Notification of date of CMS performance evaluation	1	1	1	17	17	0.85	1.7	654
iv. Notification of planned date of performance test	1	1	1	17	17	0.85	1.7	654
v. Notification of Compliance Status Report	4	1	4	17	68	3.4	6.8	2,618
vii. Semiannual Periodic Report	4	2	8	36	288	14.4	28.8	11,087
Reporting Subtotals					611.8			\$20,480

**Table 1. Annual Respondent Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
4. Recordkeeping Requirements								
a. Read instructions	See 3a							
b. Plan activities	16	1	16	17	272	13.6	27.2	10,471
c. Implement activities	Not applicable							
d. Develop record system								
i. Control equipment	4	1	4	17	68	3.4	6.8	2,618
e. Enter information								
i. Control device design	4	1	4	17	68	3.4	6.8	2,618
ii. Control equipment testing	1	1	1	17	17	0.85	1.7	654
iii. Control equipment inspection	8	1	8	36	288	14.4	28.8	11,087
iv. Control equipment monitoring	1	12	12	36	432	21.6	43.2	16,630
v. Control device CMS	1	12	12	36	432	21.6	43.2	16,630
f. Train personnel	4	1	4	36	144	7.2	14.4	5,543
h. Perform audits	Not applicable							

**Table 1. Annual Respondent Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
i. Retain records of actual throughput (facilities exempt under 63.1270(f)) ³	Not applicable							
Recordkeeping Subtotal						1,979		\$66,251
TOTAL LABOR BURDEN AND COST (rounded)						2,591		\$86,823

¹This ICR uses the following labor rates: \$33.51 per hour for technical labor, \$52.85 per hour for management labor, and \$23.43 for clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. These rates are from the *Employer Costs for Employee Compensation Historical Listing March 2004 – December 2010* published by the Bureau of Labor and Statistics and represents the state of the industry in 2008, consistent with the control costs associated with the proposed rule. Source: <ftp://ftp.bls.gov/pub/special.requests/ocwc/ect/ececqrtn.pdf>

² Respondents are expected to maintain records of actual throughput as a standard business practice; therefore, there is no additional burden associated with these records under this rule.

**Table 2: Annual Agency Burden and Cost,
NESHAP for Natural Gas Transmission and Storage (40 CFR part 63, subpart HHH)**

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Review reports								
a. Initial notification	2	1	2	17	34	1.7	3.4	1,788
b. Preconstruction review application	4	1	4	17	68	3.4	6.8	3,412
c. Performance test notification	2	1	2	17	34	1.7	3.4	1,706
d. Compliance status notification	4	1	4	17	68	3.4	6.8	3,412
e. Semiannual periodic reports ²	2	2	4	36	144	7.2	14.4	7,226
TOTAL LABOR BURDEN AND COST (rounded)					400			\$17,545

1. 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 \$59.63 (GS-13, Step 5, \$37.27 × 1.6), Technical rate of \$47.20 (GS-12, Step 1, \$29.50 × 1.6), and Clerical rate of \$23.94 (GS-6, Step 3, \$14.96 × 1.6). These rates are from the Office of Personnel Management (OPM), 2008 General Schedule, which excludes locality rates of pay.