

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal)

**OMB Control Number:** 2060-0673

**EPA ICR Number:** 2437.06

**Abstract:** The New Source Performance Standards (NSPS) for the regulations published at 40 CFR Part 60, Subpart OOOO were proposed on August 23, 2011, promulgated on August 16, 2012, and most recently amended on March 8, 2024. These regulations apply to oil and natural gas facilities that commence construction, modification or reconstruction after August 23, 2011, and on or before September 19, 2015, that are involved in the extraction and production of oil and natural gas, as well as the processing, transmission, and distribution of natural gas. Facilities that commenced construction, modification, or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb. This information is being collected to assure compliance with 40 CFR Part 60, Subpart OOOO.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

The active (previous) ICR had the following Terms of Clearance (TOC):

In accordance with 5 CFR 1320, the information collection is approved for three years. Upon resubmission of this renewal, the agency must 1) upgrade the supporting statement to align with the general 18 question supporting statement template that the federal government uses for supporting documentation for OMB reviews; and 2) provide screen shots of the electronic portal where the reporting requirements are submitted to EPA (with the control number and burden statement).

Per the Terms of Clearance on the previous ICR, this supporting statement follows the standard 18-question format. All electronic collection in this information collection is submitted through EPA's CEDRI, as discussed in section 3 of this document. Additional Paperwork Reduction Act requirements for CEDRI, including the burden statement and OMB control number, are available at:

<https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal.

## **Supporting Statement A**

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

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

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The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, volatile organic compound (VOC) and sulfur dioxide emissions from oil and natural gas production, natural gas transmission, and natural gas distribution facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart OOOO.

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

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

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The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

The notifications required in the standards 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 and the standards are being met. The performance test may also be observed.

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

### **3. USE OF TECHNOLOGY**

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

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Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule was amended to include electronic reporting provisions on August 16, 2012. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of certain notifications through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For the purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

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

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

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For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its

own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

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

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There is a distribution of business sizes for businesses involved in extraction and production of oil and natural gas, as well as the processing, transmission, and distribution of natural gas. 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. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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

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

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Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet 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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

## **7. GENERAL GUIDELINES**

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

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

These standards require the respondents to maintain all records, including reports and notifications for at least five 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 allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant

violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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

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

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (89 FR 63933) on August 6, 2024. No comments were received on the burden published in the Federal Register for this renewal.

### **8b. Consultations**

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

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 417 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Independent Petroleum Association of America (IPAA) at 202-857-4722, and the American Exploration & Production Council (AXPC) at 202-920-1507. No comments were received on the burden estimate of this ICR.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

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

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

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No payments or gifts are made 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.*

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Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

#### 11. JUSTIFICATION FOR SENSITIVE QUESTIONS

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

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The reporting or recordkeeping requirements in the standard 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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##### 12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of new or modified oil and natural gas facilities. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the table below:

<b>Standard (40 CFR part 60, Subpart OOOO)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Crude Petroleum Extraction	1311	211120
Natural Gas Extraction, Natural Gas Liquids	1321	211130

Natural Gas Transmission and Distribution	4923, 4924, 4925, 4931, 4932, 4939	221210
Pipeline Distribution of Crude Oil	4612	486110
Pipeline Transportation of Natural Gas	4922, 4923	486210

Based on our research for this ICR, on average over the next three years, approximately 417 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject, for an overall total of 417 respondents per year. The number of respondents is calculated using the Number of Respondents table that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the Total Annual Responses table shown below. The number of Total Annual Responses is 1,996.

### 12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO). Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records.

A source must make the following reports:

<b>Notifications</b>	
Notification of date of construction or reconstruction (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(1), 60.5420(a)(1)
Notification of date of actual startup (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(3), 60.5420(a)(1)
Notification of physical or operation change (for equipment groups within a process unit and sweetening units at onshore natural gas plants only)	§§60.7(a)(4), 60.5420(a)(1)
General notification and reporting requirements (for equipment groups	§60.19

<b>Notifications</b>	
within a process unit and sweetening units at onshore natural gas plants only)	
Notification of the anticipated date of a well completion operation (for gas well affected facilities) <sup>a</sup>	§60.5420(a)(2)(i)

<sup>a</sup> Sources subject to state regulations that require advance notification of well completions and that have met those notification requirements are considered to have met the advance notification requirements of paragraph §60.5420(a)(2)(i).

<b>Reports</b>	
Annual report	§§60.5420(b)(1-6)
Performance test results (electronic submission)	§§60.5420(b)(7-8)
Additional reports for onshore natural gas processing plants	§§60.5422(a-c)
Additional reports of excess emissions for sweetening unit affected facilities at onshore natural gas processing plants	§60.5423(b)

A source must keep the following records:

<b>Recordkeeping</b>	
For each gas well, maintain records identifying each well completion operation and records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with §60.5375.	§§60.5420(b)(2), 60.5420(c)(1)(i-ii)
For each gas well, maintain records required in §60.5375(b) or (f) for each well completion operation conducted for each gas well affected facility that occurred during the reporting period.	§§60.5420(b)(2), 60.5420(c)(1)(iii)
For each gas well for which you claim an exception under §60.5375(a)(3), maintain a record of the location of the well; the API well number; the specific exception claimed; the starting and ending dates for the period the well operated under the exception; and an explanation of why the well meets the claimed exception.	§§60.5420(b)(2), 60.5420(c)(1)(iv)
For each gas well, maintain a record of the digital photograph, if applicable.	§§60.5420(b)(2),

<b>Recordkeeping</b>	
	60.5420(c)(1)(v)
For each centrifugal compressor, maintain records of: identification of each centrifugal compressor using a wet seal system constructed, modified or reconstructed during the reporting period and deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in §60.5380.	§§60.5420(b)(3)(i-ii), 60.5420(c)(2)
Maintain records of each closed vent system inspection required for centrifugal compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(6)
Maintain records of each cover inspection required for centrifugal or reciprocating compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(7)
Maintain records of each inspection, key checkout, or alarm sounding required for centrifugal or reciprocating compressors or storage vessels.	§§60.5420(b)(3)(iii), 60.5420(c)(8)
Maintain records of closed vent system monitoring required for centrifugal or reciprocating compressors.	§§60.5420(b)(3)(iii), 60.5420(c)(9)
Maintain records of carbon replacement schedule required for centrifugal compressors.	§§60.5420(b)(3)(iii), 60.5420(c)(10)
Maintain records of minimum and maximum operating parameter values, continuous parameter monitoring system data, calculated averages of continuous parameter monitoring system data, results of all compliance calculations, and results of all inspections for each centrifugal compressor.	§§60.5420(b)(3)(iii), 60.5420(c)(11)
For each reciprocating compressor, maintain records of cumulative number of hours of operation, records of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system, and records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in §60.5385.	§§60.5420(b)(4), 60.5420(c)(3)(i-iii)
For each pneumatic controller, maintain records of identification, location and manufacturer specifications for each pneumatic controller constructed, modified or reconstructed during the reporting period, records of reasons why pneumatic controllers with a bleed rate of greater than 6 scf/hr are required, records of bleed rate for pneumatic controllers located at natural gas processing plants, and records of deviations where the pneumatic controller was not operated in compliance with the requirements specified in §60.5390.	§§60.5420(b)(5), 60.5420(c)(4)(i-v)
Maintain records of: identification, location, emissions, and deviations for each storage vessel that is constructed, modified, or reconstructed, a statement of VOC emissions reductions and controls, a statement of days of	§§60.5420(b)(6), 60.5420(c)(5)

<b>Recordkeeping</b>	
service for mobile storage vessels, and identifications of each storage vessel removed from or returned to service.	
Records of carbon adsorber replacement required for storage vessels.	§60.5420(c)(12)
Records of inspections, corrective actions taken, manufacturers' operating instructions, procedures and maintenance schedule, and EPA Method 22 test results for storage vessels.	§60.5420(c)(13)
Records of logs for all inspection, repair and maintenance activities for each control device failing the visible emissions test.	§60.5420(c)(14)
For equipment located at onshore natural gas processing plants, keep records of monitoring events, all actions related to detection and repair of leaks, information pertaining to the design requirements for closed vent systems and control devices, and other applicable requirements as specified in §60.486a.	§§60.5421(a), 60.486a
For pressure relief devices located for onshore natural gas processing plants, keep records of leak detection markers. For each leak detected, keep a record of equipment identification numbers, dates of detection and repair(s), repair methods, repair-related decisions, dates of process shutdowns, and the date of successful repair of the leak.	§60.5421(b)(2)(i-ix)
For equipment located at onshore natural gas processing plants, maintain a list of identification numbers for equipment that are designated for no detectable emissions under the provisions of §60.482-4a(a).	§60.5421(b)(2)(x)
For onshore natural gas processing plants, keep records related to the number of pressure relief valves for which leaks were detected and for which leaks were not repaired as required in §60.5401(b).	§60.5422(c)
For sweetening units located at onshore natural gas processing plants, keep records of calculations and measurements required in §60.5405(a) and (b) and §60.5407(a) through (g) for at least 2 years following the date of the measurements.	§§60.5423(a), 60.7(d)
For sweetening units located at onshore natural gas processing plants, keep for the life of the facility a record of analysis demonstrating the source's design capacity.	§§60.5423(c-d)
Keep records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems for onshore natural gas processing plants.	§60.7(f)
Keep records of parts of closed vent systems designated as unsafe or difficult to inspect for onshore natural gas processing plants.	§§60.482-10a(l)(1), (2)

<b>Recordkeeping</b>	
Keep records related to pressure relief devices; number of pressure relief devices for onshore natural gas processing plants.	§§60.5421(b), 60.5422(a)-(c)
Keep records of inspections of closed vent systems during which no leaks are detected for onshore natural gas processing plants.	§§60.482-10a(l)(4), (5)
Keep records of design requirements for and operation of closed vent systems and control devices for onshore natural gas processing plants.	§60.486a(d)
Keep records listing equipment for onshore natural gas processing plants.	§60.486a(e)
Keep records of compliance tests for onshore natural gas processing plants.	§60.486a(e)(4)
Keep records of valves designated as unsafe or difficult to monitor for onshore natural gas processing plants.	§§60.486a(f), 60.5417(b)
Keep records of design criterion that indicate failure for onshore natural gas processing plants.	§60.486a(h)
Keep records of parts not in VOC service or otherwise exempt for onshore natural gas processing plants.	§60.486a(j)

### 12c. Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Gather relevant information.
Perform initial performance test, Methods 1 or 1A; 2, 2A, 2C, or 2D; 3A, 3C, 4, 6, 10, 15, 16A, 21, 22, 25A and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.

<b>Respondent Activities</b>
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 54,300 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 received.

This ICR uses the following labor rates:

Managerial	\$172.41 (\$82.10 + 110%)
Technical	\$141.75 (\$67.50 + 110%)
Clerical	\$71.36 (\$33.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

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

*The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating,*

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

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

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The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to this regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

The total capital/startup costs for this ICR are \$0. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are \$3,590,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$3,590,000.

## **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.*

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### **14a. Agency Activities**

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

- Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
- Audit facility records.
- Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

Following notification of startup, the reviewing authority could 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 note 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.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

#### **14b. Agency Labor Cost**

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The average annual Agency burden and cost during the three years of the ICR is estimated to be 2,300 hours at a cost of \$128,000. See Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal).

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

Managerial	\$76.91 (GS-13, Step 5, \$48.07 + 60%)
Technical	\$57.07 (GS-12, Step 1, \$35.67 + 60%)
Clerical	\$30.88 (GS-6, Step 3, \$19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost –NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR Part 60, Subpart OOOO) (Renewal).

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

There are no non-labor costs to the Agency associated with this information collection.

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

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

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The change in burden from the most recently approved ICR is due to adjustments. The adjustment decrease in burden from the most recently approved ICR is due to a decrease in the number of existing

sources and a growth rate of zero new sources. The decrease in the number of respondents also resulted in a decrease in labor costs, which was offset slightly by the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (December 2023) to calculate respondent burden costs. There is an increase in Capital O&M costs, which is due to the use of updated labor rates and an update from 2012\$ to 2023\$ using the Chemical Engineering Plant Cost Index (CEPCI).

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

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

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All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

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

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

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

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

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

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There are no exceptions to the topics of the certification statement.

**Table 1: Annual Respondent Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, Subpart OOOO) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Report requirements	N/A							
a. Familiarization with the rule requirements <sup>c</sup>	1	1	1	417	417	20.9	41.7	\$65,680.21
b. Required activities								
i. Notification of gas well completion <sup>d</sup>	0.5	33	17	0	0	0	0	\$0
ii. Notification of gas well recompletion <sup>d</sup>	0.5	4	2	0	0	0	0	\$0
iii. Notification of new gas processing plant <sup>e</sup>	1	1	1	0	0	0	0	\$0
iv. Notification of new sweetening unit <sup>f</sup>	1	1	1	0	0	0	0	\$0
c. Create information	See 4B							
d. Gather existing information	See 4E							
e. Annual reports								
i. Gas well completion/recompletion <sup>d</sup>	16	1	16	0	0	0	0	\$0
ii. Sweetening unit <sup>f</sup>	1	1	1	7	7	0.34	0.7	\$1,063.96
iii. Centrifugal compressor <sup>g</sup>	8	1	8	31	246	12	25	\$38,746.60
iv. Reciprocating compressor <sup>h</sup>	8	1	8	1,314	10,512	526	1,051	\$1,655,708.33
v. Production pneumatic	8	1	8	235	1,880	94	188	\$296,112.22

controller <sup>i</sup>								
vi. Gas processing pneumatic controller <sup>j</sup>	8	1	8	35	282	14	28	\$44,416.83
vii. Storage vessel <sup>k</sup>	8	1	8	238	1,904	95	190	\$299,892.38
f. Semiannual reports								
i. Gas processing plant <sup>l</sup>	40	2	80	68	5,460	273	546	\$859,985.49
<b>Reporting Subtotal</b>						<b>23,814</b>		<b>\$3,261,606</b>
5. Recordkeeping requirements								
a. Read instructions	See 4A							
b. Plan activities	See 4B							
c. Implement activities								
i. Filing and maintaining records <sup>m</sup>	5	12	60	342	20,520	1,026	2,052	\$3,232,033.38
ii. Filing and maintaining records <sup>n</sup>	5	12	60	100	6,000	300	600	\$945,039.00
d. Record data	N/A							
e. Time to transmit or disclose information								
i. Records required by standards	See 5C							
f. Time to train personnel	See 5C							
g. Time for audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>30,498</b>		<b>\$4,177,072</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>o</sup></b>						<b>54,300</b>		<b>\$7,440,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>o</sup></b>								<b>\$3,590,000</b>
<b>GRAND TOTAL (rounded)<sup>o</sup></b>								<b>\$11,000,000</b>

N/A - Not Applicable

a EPA estimates an average of 417 existing sources and no new sources will be subject to the standard over the next three years. Existing sources comprise 235 exploration and production businesses, 107 transmission and storage operations, 91 processing plants and 9 sweetening units. This number is expected to decrease over time as sources are modified or retired from service.

b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are increased by 110 percent to account for varying industry wage rates and the

additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

c This burden represents the time existing respondents spend re-familiarizing themselves with rule requirements, or that new respondents spend learning rule requirements.

d Initial notification and annual reporting for completions and recompletions is required for gas wells that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015. New gas wells or gas wells modified after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

e Processing plants that commenced construction, modification or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

f EPA estimates an average of 9 existing sweetening units and no new sweetening units. EPA estimates that 75% of those sweetening units will experience one reportable deviation per year. Sweetening units that commenced construction, modification or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

g EPA estimates an average of 41 existing and no new centrifugal compressors equipped with wet seals at processing plants. EPA estimates that 75% of those centrifugal compressors will experience one reportable deviation per year. Centrifugal compressors equipped with wet seals at processing plants that commenced construction, modification or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

h EPA estimates an average of 1,314 existing and no new reciprocating compressors. New reciprocating compressors that commenced construction, modification or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

i EPA estimates 10,678 pneumatic controllers across the 235 exploration & production sites. EPA estimates that all 235 sites will experience one reportable deviation per year.

j EPA estimates an average of 47 existing and no new pneumatic controllers at affected processing plants. EPA estimates that 75% of those pneumatic controllers will experience one reportable deviation per year.

k EPA estimates an average of 238 existing and no new respondents in the production, processing, transmission, or storage segment will submit annual reports. EPA anticipates each report will cover approximately four storage vessels, based on research the Agency conducted during initial rule development.

l EPA estimates an average of 91 existing and no new gas processing plants. EPA estimates that 75% of those plants will experience one reportable deviation per year.

m Activity applies to exploration & production businesses and transmission & storage operations, for which EPA estimates an average of 235 and 107 sources, respectively.

n Activity applies to gas processing plants and sweetening units. EPA estimates an average of 91 existing processing plants and 9 existing sweetening units.

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

**Table 2: Average Annual EPA Burden and Cost – NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution (40 CFR part 60, Subpart OOOO) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
Review initial notifications <sup>c</sup>								
i. Notification of gas well completion	0.5	33	17	0	0	0	0	\$0
ii. Notification of gas well recompletion	0.5	4	2	0	0	0	0	\$0
iii. Notification of new gas processing plant	0.5	1	1	0	0	0	0	\$0
iv. Notification of new sweetening unit	0.5	1	1	0	0	0	0	\$0
Review annual reports								
i. Gas well completion/recompletion	1	1	1	0	0	0	0	\$0
ii. Sweetening unit	1	1	1	7	7	0.34	0.7	\$432.37
iii. Centrifugal compressor	1	1	1	31	31	1.54	3.1	\$1,968.45
iv. Reciprocating compressor	1	1	1	1,314	1,314	65.70	131.4	\$84,100.60
v. Production pneumatic controller	1	1	1	235	235	12	24	\$15,040.82
vi. Gas processing pneumatic controller	1	1	1	35	35	1.76	3.5	\$2,256.09
vii. Storage vessel	1	1	1	238	238	12	24	\$15,232.83
Review semiannual reports								
i. Gas processing plant	1	2	2	68	137	6.8	14	\$8,736.86
<b>TOTAL (rounded) <sup>c</sup></b>						<b>2,300</b>		<b>\$128,000</b>

**Assumptions:**

a EPA estimates an average of 417 existing sources and no new sources will be subject to the standard over the next three years. Existing sources comprise 235 exploration and production businesses, 107 transmission and storage operations, 91 processing plants and 9 sweetening units. This number is expected to decrease over time as sources are modified or retired from service.

b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 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.

c Initial notification is required for these source categories that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015. New gas wells or gas wells constructed, modified, or reconstructed after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents  (E=A+B+C-D)
1	0	417	0	0	417
2	0	417	0	0	417
3	0	417	0	0	417
Average	0	417	0	0	417

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities. Facilities that commence construction, modification, or reconstruction after September 18, 2015 and on or before December 6, 2022 are subject to 40 CFR 60, Subpart OOOOa. Facilities that commence construction, modification, or reconstruction after December 6, 2022 are subject to 40 CFR 60, Subpart OOOOb.

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notifications <sup>a</sup>				
Gas well completion	0	33	0	0
Gas well recompletion	0	4	0	0
New gas processing plant	0	1	0	0
New sweetening unit	0	1	0	0
Annual reports				
Gas well completion/recompletion	0	1	0	0
Sweetening unit	7	1	0	7
Centrifugal compressor	31	1	0	31
Reciprocating compressor	1,314	1	0	1,314
Production pneumatic controller	235	1	0	235
Gas processing pneumatic controller	35	1	0	35
Storage vessel	238	1	0	238
Semiannual reports				
Gas processing plant	68	2	0	137
			Total	1,996

Footnotes:

<sup>a</sup> These notifications are initial notifications for sources constructed, modified or reconstructed after August 2011 and prior to September 2015.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Requirement	Capital/Startup Cost for One Respondent <sup>3</sup>	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent <sub>1,3</sub>	Number of Respondents with O&M	Total O&M, (E X F)
SO <sub>2</sub> CEMS (control outlet)	\$99,635	0	\$0	\$23,339	9	\$210,053
Continuous control device monitoring for centrifugal compressors <sup>2</sup>	N/A	0	\$0	\$3,402	41	\$139,482
Continuous control device monitoring for storage vessels <sup>2</sup>	N/A	0	\$0	\$3,402	952	\$3,238,704
Total (rounded) <sup>4</sup>			\$0			\$3,590,000

CEM - Continuous Emission Monitoring System

N/A - Not Applicable

**Assumptions:**

<sup>1</sup> Annual O&M costs for centrifugal compressors and storage vessels were calculated assuming 2 hours per month at \$141.75 per hour.

<sup>2</sup> Capital/Startup costs for continuous control device monitoring were included in storage vessel and centrifugal compressor control device costs.

<sup>3</sup> Capital/Startup and Annual O&M costs have been updated from 2012 to 2023 using the CEPCI Index.

<sup>4</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.