SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Amendments)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Amendments), EPA ICR Number 1975.12, OMB Control Number 2060-0548.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) were proposed on December 19, 2002: promulgated on June 15, 2004; and revised on: June 26, 2006; January 18, 2008; January 30, 2013; and February 27, 2014, and August 10, 2022.

The amendments mainly add electronic reporting provisions to the rule. In general, the changes do not result in regulated entities needing to submit anything additional electronically that is not currently submitted via paper copies, and this is therefore expected to lessen recordkeeping and reporting burden. This supporting statement addresses incremental information collection activities that will be imposed by the amendments to the NESHAP for Stationary Reciprocating Internal Combustion Engines.

These regulations apply to owners and operators of a stationary reciprocating internal combustion engines (RICE) at either a major or area source of hazardous air pollutant (HAP) emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart ZZZZ.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. As a result of the amendments, all reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state

or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The “Affected Public” covers stationary RICE entities located at major or area source facilities. We assume that they will all respond to EPA inquiries. The “burden” to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost with Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Amendments). The “burden” to the Federal government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost with Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Amendments).

Over the next three years, an average of 158,977 existing respondents per year will be subject to these standards, and an average of 1,374 new respondents per year will become subject to these same standards. In addition, there are 755,430 existing respondents that are subject to these same standards, but only have recordkeeping requirements. The overall average number of respondents is 915,781 per year.

The “burden” to the regulated community may be found in section 6(f) below. The cost of this ICR to sources that are impacted by addition of electronic reporting requirements, as compared to the same time period without electronic reporting requirements being included in ZZZZ, is ($7,581,151) per year if averaged over the first 3 years after the amendments are final. The total Agency cost during the first 3 years of the ICR is estimated to be ($11,253,637) per year, again compared to the same time period without electronic reporting requirements being included in ZZZZ. Parentheses indicate negative values, i.e., a cost savings.

The Office of Management and Budget (OMB) approved the currently-active ICR without any “Terms of Clearance”.

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 either 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:

> (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, HAP emissions from RICE either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart ZZZZ.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility’s initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or its delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and that these standards are being met. The performance test may also be observed.

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

Additionally, via these amendments, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of change in information required in 40 CFR 63.9(j), notifications of compliance status required in 40 CFR 63.9(h), performance test reports required in 40 CFR 63.10(d)(2), performance evaluations of CEMS required in 40 CFR 63.6625(a)(5), and semiannual reports required in 40

CFR 63.6650 through the EPA's CDX, using the CEDRI. For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart ZZZZ. For the notifications required in 40 CFR 63.9(b), 63.9(h), and 63.9(j), owners and operators are required to upload a portable document format (PDF) file of the required notifications.

The EPA is also requiring that 40 CFR Part 63, Subpart ZZZZ performance test reports and performance evaluation reports must be prepared using the EPA's Electronic Reporting Tool (ERT) and submitted through CEDRI.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart ZZZZ.

3(a) Non-duplication

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 similar standards to implement the Federal standards, a copy of the report submitted to either 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.

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

A public notice of this collection was provided in the June 26, 2023 Federal Register notice of proposed rulemaking entitled, "National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines and New Source Performance Standards: Internal Combustion Engines; Electronic Reporting Amendments" (88 FR 41361). EPA did not receive any comments that required a change to this ICR supporting statement, but the limited number of comments received that related to the ICR supporting statement and the EPA's responses to those comments can be viewed in the Response to Comment document for the final rule.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth for this source sector. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting

provisions in these standards, has been 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 and has been assumed to be linear for the purposes of this supporting statement. Approximately 158,977 respondents per year will be subject to these standards over the three-year period covered by this ICR, with an additional 1,374 new respondents becoming subject to these same standards per year. In addition, there are 755,430 existing respondents that are subject these standards, but only have recordkeeping requirements. The overall average number of respondents is 1,075,908 per year.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and 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.

3(e) General Guidelines

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.

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

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

questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of new, reconstructed, or existing stationary RICE. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes for the affected sources are provided in the following table:

Standard (40 CFR Part 63, Subpart ZZZZ)	SIC Codes	NAICS Codes
Electric Power Generation, Transmission, or Distribution	4911	2211
Crude Petroleum Extraction	1311	211120
Natural Gas and Natural Gas Liquid Extraction	1321	211130
General Medical and Surgical Hospitals	8062	622110
Natural Gas Transmission	4922	486210
National Security	9711	928110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ).

A source must make the following reports:

Notifications	
Initial notifications (e.g., construction/reconstruction, anticipated startup, actual startup)	§63.6645, §63.9(b)
Notification of compliance status	§63.6645, §63.9(h)
Notification for exempt RICE	§63.6645(f)
Notification of performance test	§63.6645(g), §63.7(b)(1), §63.9(e)
Semiannual and annual compliance reports	§63.6650

A source must keep the following records:

Recordkeeping	
Five-year retention of records	§63.6660(b)
Records of all notifications and reports	§63.6655(a)(1)
Records of the occurrence and duration of each malfunction of the stationary RICE and each malfunction of the air pollution control equipment	§63.6655(a)(2)
Records of performance tests and performance evaluations	§63.6655(a)(3)
Records of all required maintenance performed on the air pollution control and monitoring equipment	§63.6655(a)(4)
Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation	§63.6655(a)(5)
Records of each startup, shutdown, malfunction, maintenance, or repair, as well as previous (i.e., superseded) versions of the performance evaluation plan	§63.6655(b), §63.10(b), §63.8(d)(3)
Records of daily fuel usage for landfill and digester gas-fired units	§63.6655(c)
Records of the catalyst pressure drop (measured monthly), catalyst inlet temperature (4-hour average), and average reduction of CO emissions determined from CEMS measurements before and after the emission control device (using a 4-hour average, averaged every hour)	§63.6655(d)
Records of maintenance conducted on the stationary RICE	§63.6655(e)
Records of the number of hours of operation recorded through a non-resettable hour meter	§63.6655(f)

Electronic Reporting

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 amendments to the rule include electronic reporting provisions. Respondents are required to use the EPA's ERT to develop performance test reports and submit them through the EPA's CEDRI, which can be accessed through the EPA's 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

notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently required notification in PDF. The semiannual reports are to be created using Form 5900-597, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically, and in fact it will be a time saving measure for the regulated community to do so versus submitting them in paper form.

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

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CPMS for pressure drop and temperature for catalyst and CO monitors.
Perform initial performance test, Reference Method 1, 1A, 3, 3A, 3B, 4, 7E, 10, 19, 25A, 320, or ASTM Method D6522-00 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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
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.

5(b) Collection Methodology and Management

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. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

Minimizing the information collection burden for all sizes of organizations is a continuing effort for the EPA. The EPA is not making to make any changes in terms of who is required to report and what they are required to report, only the manner in which the information is reported, and this change is expected to result in an overall reduction in burden. The EPA does not believe that the NESHAP will have a significant impact on a substantial number of small entities. Furthermore, although the recordkeeping and reporting requirements are the same for

small and larger businesses, these requirements are considered the minimum needed to ensure compliance and, therefore, cannot be reduced further for small businesses.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost– NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Amendments).

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

The Agency may neither conduct nor 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 record-keeping and reporting requirements is estimated to be 4,320,000 hours (rounded) (Total Labor Hours from Table 1 at the end of this document). These hours are based on Agency studies and background documents from the development of the regulations, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$138.24 ($65.83 + 110%)
Technical	$127.68 ($60.80 + 110%)
Clerical	$ 64.83 ($30.87 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2022, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents [a]	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M [b]	(G) Total O&M, (E X F)
CO monitors [c]	$786	1,269	$996,950	$2,524	26,249	$66,251,197
CPMS - small [d]	$2,302	1,269	$2,920,739	N/A	N/A	
CPMS - large [d, e]	$567	366	$207,638	N/A	N/A	
Total [f]			$4,130,000			$66,300,000

[a] We estimate there are 769 (non-exempt) new major source stationary RICE greater than 500 hp and 500 new area source stationary RICE per year. We assume all non-exempt new sources will incur capital costs. (769 + 500 = 1,269 sources) There are an additional 105 exempt new major stationary RICE sources.

[b] We estimate an average of 21,269 existing major source stationary RICE greater than 500 hp and 4,980 existing area source stationary RICE per year will have O&M costs over the three-year period of this ICR. (21,269 + 4,980 = 26,249 sources)

[c] Each facility can purchase one portable CO monitor and use it for several stationary RICE. The cost of a CO monitor was introduced in EPA ICR Number 1975.04 (which was published in 2007). These costs were escalated from $2007 to $2021 by using the Chemical Engineering Plant Cost Index (CEPCI) from 2007 [525.4] and the CEPCI from 2021 [708]. This increased the cost of a CO monitor from $583 to $786 for this analysis.

[d] CPMS – continuous parameter monitoring system for temperature monitoring and monthly pressure drop measurement. The cost of a CPMS was introduced in EPA ICR Number 1975.04 (which was published in 2007). These costs were escalated from $2007 to $2021 by using the Chemical Engineering Plant Cost Index (CEPCI) from 2007 [525.4] and the CEPCI from 2021 [708]. This increased the cost of a small CPMS from $1,708 to $2,302 and the cost of a large CPMS from $421 to $567 for this analysis.

[e] We assume that only 366 of the 769 new (non-exempt) major source stationary RICE (>500 hp) have to additionally purchase large CPMS.

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

The total capital/startup costs for this ICR are $4,130,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $66,300,000. This is the total of column G.

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 $70,400,000.

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 such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $27,900,000.

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

Managerial	$70.56 (GS-13, Step 5, $44.10 + 60%)
Technical	$52.37 (GS-12, Step 1, $32.73 + 60%)
Clerical	$28.34 (GS-6, Step 3, $17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost with Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ).

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

Based on our research for this ICR, on average over the next three years, approximately 158,977 existing respondents per year will be subject to these standards. It is estimated that an average of 1,374 additional respondents per year will become subject to these same standards. There are an additional 755,430 respondents who keep records, but do not submit reports. The overall average number of respondents, as shown in the table below, is 915,781 per year.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [a]	(B) Number of Existing Respondents [b]	(C) Number of Existing Respondents that keep records but do not submit reports [c]	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1,364	157,603	755,430	0	914,397
2	1,374	158,977	755,430	0	915,781
3	1,384	160,351	755,430	0	917,165
Average	1,374	158,977	755,430	0	915,781

[a] New respondents include 769 major source non-exempt stationary RICE (>500 hp) per year, 105 major source exempt stationary RICE (>500 hp) per year, and an average of 490 area source stationary RICE per year (1,374 respondents per year total). The 105 major source exempt stationary RICE submit an initial notification but do not submit reports.

[b] The average number of existing respondents include 21,269 major source stationary RICE (>500 hp), 4,980 area source stationary RICE, 86,649 CI engines, 45,633 SI engines, and 446 utilities (158,977 respondents per year).

[c] Existing respondents that do not submit reports include 738,896 CI engines per year and 16,534 SI engines per year (738,896 + 16,534 = 755,430 per year).

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents per year over the three-year period of this ICR is 915,781.

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

Total Annual Responses				
(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
Notification of construction/reconstruction	1,269	1	0	1,269
Notification of anticipated startup	1,269	1	0	1,269
Notification of actual startup	1,269	1	0	1,269
Notification of performance test				
Quarterly	1,605	4	0	6,420
Semiannually	8,603	2	0	17,207
Annually	87	1	0	87
Initial notification for exempt RICE	105	1	0	105
Initial notification of compliance	1,269	1	0	1,269
Semiannual compliance report	132,536	2	755,430	1,020,502
Annual compliance report	26,511	1	0	26,511
			Total	1,075,908

The number of Total Annual Responses is 1,076,000 (rounded).

The total annual labor costs are $530,000,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost with Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ)

6(e) Bottom Line 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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 4,320,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost with Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ).

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.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 4.0 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $70,400,000. 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 three years is estimated to be 546,000 labor hours at a cost of $27,900,000; see below in Table 2: Average Annual EPA Burden and Cost with Electronic Reporting– NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) at the end of this document.

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.

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The increase in burden from the most-recently approved ICR is due to an update to labor rates to match June 2022 rates from the Bureau of Labor and Statistics, and an increase in the number of respondents since the last ICR Renewal. EPA estimates a linear growth in the industry sector with an additional 1,374 new sources per year that become subject to this NESHAP. The capital/startup and operation and maintenance (O&M) costs have increased compared with the costs in the previous ICR due to an increase in the number of existing sources operating portable CO monitors, escalating the O&M costs of CO monitors from $2007 to $2021, and escalating the O&M costs of small and large CPMS from $2007 to $2021.

In terms of the change in burden due to the proposed addition of electronic reporting requirements to the NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ), the result is an average annual reduction in burden for respondents over the three years of this ICR of 61,799 hours per year and an average reduction in cost for the three years of this ICR of $7,581,151 per year. The average annual reduction in cost for the three years of this ICR is approximately $8.28 per year per respondent. See the following table:

	Respondents			
	First year	**Second Year**	**Third Year**	**Average**
ZZZZ Incremental hours (with electronic reporting vs without electronic reporting)	242,005	(213,176)	(214,227)	(61,799)
ZZZZ Incremental $ (with electronic reporting vs without electronic reporting)	$ 29,687,721	$ (26,151,115)	$ (26,280,058)	$ (7,581,151)
Number of respondents	914,397	915,781	917,165	915,781
Incremental $ per respondent	$32.47	$ (28.56)	$ (28.65)	$ (8.28)

Note: negative indicates cost savings

The proposed addition of electronic reporting also impacts the Agency tally. The result is an average annual reduction in burden for the three years of this ICR of 220,360 hours per year for EPA staff and a reduction in cost for the three years of this ICR of $11,254,000 per year for EPA staff. See the following table:

	EPA			
	First year	**Second Year**	**Third Year**	**Average**
ZZZZ Incremental hours (with electronic reporting vs without electronic reporting)	(219,106)	(220,360)	(221,615)	(220,360)
ZZZZ Incremental $ (with electronic reporting vs without electronic reporting)	$ (11,189,574)	$ (11,253,637)	$ (11,317,699)	$ (11,253,637)

Note: negative indicates cost savings

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 4.0 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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 regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

Part B of the Supporting Statement

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

ATTACHMENT 1

Table 1: Annual Average Respondent Burden and Cost with Proposed Addition of Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Three Year Average)

	A	B	C	D	E	F	G	H
Burden Item	**Technical person-hours per occurrence**	**No. of occurrences per respondent per year**	**Technical person-hours per respondent per year (AxB)**	**Respondents per year [a]**	**Technical hours per year (CxD)**	**Management hours per year (Ex0.05)**	**Clerical hours per year (Ex0.10)**	**Total cost per year [b] ($)**
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with rule requirement								
New sources	4	1	4	1,374	5,496	275	550	$775,347
Existing sources with electronic reporting [k,l]	2	1	2	132,536	265,072	13,254	26,507	$37,394,993
Existing sources without electronic reporting [k]	1	1	1	26,441	26,441	1,322	2,644	$3,730,160
B. Required Activities								
4-SRB <5,000 HP (once per year)[c]	24	1	24	86	2,064	103	206	$291,178
4-SRB ≥5,000 HP (once per year)[c]	8	1	8	1	8	0.4	0.8	$1,129
Quarterly Performance Test (Facilities with Multiple RICE)[c]	24	4	96	1,605	154,080	7,704	15,408	$21,736,813
Quarterly Performance Test (Facilities with One RICE)[c]	6	1	6	5	30	1.5	3	$4,232
Semiannual Performance Test [m]	24	2	48	9,012	432,592	21,630	43,259	$61,027,852
C. Gather Existing Information	Included in 3D							
D. Write Report								
Notification of Construction/Reconstruction [d]	2	1	2	1,269	2,538	127	254	$358,048
Notification of Anticipated Startup [d]	2	1	2	1,269	2,538	127	254	$358,048

Notification of Actual Startup [d]	2	1	2	1,269	2,538	127	254	$358,048
Notification of Performance Test [c]								
Quarterly	2	4	8	1,605	12,840	642	1,284	$1,811,401
Semiannually	2	2	4	8,603	34,413	1,721	3,441	$4,854,856
Annually	2	1	2	87	174	8.7	17	$24,547
Initial Notification for Exempt RICE	2	1	2	105	210	10.5	21	$29,626
Initial Notification of Compliance [d,j]	1	1	1	1,269	1,269	63	127	$179,024
Semiannual Compliance Report [e,j]	0.5	2	1	132,536	132,536	6,627	13,254	$18,697,496
Annual Compliance Report [f,j]	0.5	1	0.5	25,995	12,998	650	1,300	$1,833,620
Annual Compliance Report (Emergency RICE) [g]								
Utilities [j]	8	1	8	446	3,568	178	357	$503,355
Curtailment Service Providers [j]	500	1	500	70	35,000	1,750	3,500	$4,937,620
Reporting Subtotal						***1,295,366***		***$158,907,393***
4. Recordkeeping Requirements								
A. Familiarize with rule requirement	Included in 3A							
B. Train Personnel [d]	16	1	16	1,269	20,304	1,015	2,030	$2,864,384
C. Continuous Monitoring [h]								
Portable CO Monitor	40	1	40	500	20,000	1,000	2,000	$2,821,497
Pressure and Temperature	30	1	30	60,242	1,807,270	90,364	180,727	$254,960,344
D. Record Information	1	1	1	780,695	780,695	39,035	78,070	$110,136,477
Recordkeeping Subtotal						***3,022,510***		***$370,782,702***
TOTAL LABOR BURDEN AND COSTS (rounded) [i]						**4,320,000**		**$530,000,000**
TOTAL CAPITAL AND O&M COST (rounded) [i]								$70,400,000
GRAND TOTAL (rounded) [i]								$600,000,000

Assumptions:

[a] We estimated an average of 158,977 existing respondents and 1,374 new respondents will be subject to the standard per year over the three-year period of this ICR. The number of existing respondents include 21,269 major source stationary RICE (>500 hp), 4,980 area source stationary RICE, 86,649 CI engines, 45,633 SI engines, and 446 utilities. The number of new respondents included 769 non-exempt major stationary RICE (>500 hp), 105 exempt major stationary RICE (>500 hp), and 490 area sources.

[b] This ICR used the following labor rates: $138.24 per hour for Managerial Labor (Management, Business, and Financial); $127.68 per hour for Technical labor (Professional and Related), and $64.83 per hour for Clerical labor (Office and Admin Support). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2022, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates were increased by 110 percent to account for the benefit packages available to those employed by private industry. See https://www.bls.gov/news.release/ecec.t02.htm

[c] The estimated number of sources for these activities was obtained from EPA ICR Number 1975.04.

[d] We assumed all non-exempt new sources must complete these activities (1,374 new sources - 105 major exempt new sources = 1,269 sources).

[e] We assumed an average 132,536 existing sources per year have to write semiannual reports. This estimate includes 21,269 existing major source stationary RICE (>500 hp), 4,980 existing area sources, 60,654 existing CI engines, and 45,633 existing SI engines.

[f] We assumed 25,995 existing CI engines have to complete annual reports. This estimate is based on EPA ICR Number 1975.07.

[g] We assumed 446 local utilities and 16 hours per annual report per year, and 70 curtailment service providers with 1,000 hours per report per year. This estimate is based on the January 2013 Final Rule amendment. Reporting requirements for emergency RICE began in 2016.

[h] These estimates were obtained from EPA ICR Number 1975.04, 1975.05, 1975.07 and 1975.08.

[i] Totals were rounded to 3 significant figures. Figures may not add exactly due to rounding.

[j] We assumed that electronic reporting would result in a 50 percent labor savings associated with electronic submissions through CEDRI.

[k] The number of existing sources with electronic reporting are the 132,536 that submit semiannual reports (21,269 major source stationary RICE (>500 hp); 4,980 area source stationary RICE; 45,633 SI engines; and 60,654 CI engines). The remaining number of existing sources without electronic reporting is 158,977 – 132,536 = 26,441.

[l] We assumed that existing sources with electronic reporting would spend more time reviewing the new rulemaking in the first year to become familiar with new requirements and changes to current requirements. We assumed this would be 4 hours per respondent for the first year, same as for new sources. For years 2 and 3, the amount of time for existing sources with electronic reporting to review the new rulemaking would be 1 hour. The average is (4 + 1+ 1) / 3 = 2 hours per year.

[m] The number of sources was based on EPA ICR Number 1975.04 and 1975.05, which were then escalated to years 2022, 2023, and 2024.

Table 2: Average Annual EPA Burden and Cost with Proposed Addition of Electronic Reporting – NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Three Year Average)

	A	B	C	D	E	F	G	H
Burden Item	**Technical person-hours per occurrence**	**No. of occurrences per respondent per year**	**Technical person-hours per respondent per year (AxB)**	**Respondents per year [a]**	**Technical hours per year (CxD)**	**Management hours per year (Ex0.05)**	**Clerical hours per year (Ex0.10)**	**Total cost per year ($) [b]**
Report review								
Notification of Construction/Reconstruction	1	1	1	1,269	1,269	63	127	$74,528
Notification of Anticipated Startup	1	1	1	1,269	1,269	63	127	$74,528
Notification of Actual Startup	1	1	1	1,269	1,269	63	127	$74,528
Notification of Performance Test								
Quarterly	1	4	4	1,605	6,420	321	642	$377,044
Semiannually	1	2	2	8,603	17,207	860	1,721	$1,010,541
Annually	1	1	1	87	87	4	9	$5,109
Initial Notification for Exempt RICE	1	1	1	105	105	5	11	$6,167
Initial Notification of Compliance [f]	1.4	1	2	1,269	1,777	89	178	$104,339
Semiannual Compliance Report [c,f]	1.4	2	4	132,536	371,101	18,555	37,110	$21,794,602
Annual Compliance Report [d,f]	1.4	2	4	26,511	74,231	3,712	7,423	$4,359,545
TOTAL (rounded) [e]					**546,000**			**$27,900,000**

Assumptions:

[a] We estimated an average of 158,977 existing respondents and 1,364 new respondents will be subject to the standard per year over the three-year period of this ICR. The number of existing respondents include 21,269 major source stationary RICE (>500 hp), 4,980 area source stationary RICE, 86,649 CI engines,

45,633 SI engines, and 446 utilities. The number of new respondents includes 769 non-exempt major stationary RICE (>500 hp), 105 exempt major stationary RICE (>500 hp), and 490 area sources per year.

[b] This ICR used the following labor rates: $70.56 for managerial (Grade 13, Step 5), $52.37 for technical (Grade 12, Step 1), and $28.34 for clerical labor (Grade 6, Step 3). These rates are from the Office of Personnel Management (OPM), 2022 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] We assumed 132,536 existing sources have to write semiannual reports. This estimate includes 20,395 existing major source stationary RICE (>500 hp), 4,980 existing area sources, 60,654 existing CI engines, and 45,633 existing SI engines.

[d] We assumed 25,995 existing CI engines, 446 local utilities, and 70 curtailment service providers have to complete annual reports. This estimate is based on EPA ICR Number 1975.07 and the January 2013 Final Rule amendment.

[e] Totals were rounded to 3 significant figures. Figures may not add exactly due to rounding.

[f] We assumed that electronic reporting would result in a 30 percent labor savings for EPA personnel associated with electronic submissions through CEDRI. The original assumption was 2 hours per report; the new assumption is 1.4 hours per report.