

August 13, 2026

Environmental Protection Agency
Office of Air and Radiation
New Source Review Branch
US EPA Office of State Air Partnerships
109 TW Alexander Drive
Research Triangle Park, NC 27711

Subject: Comments of the National Ocean Industries Association and Offshore Operators Committee in response to the burden hour information associated with the Outer Continental Shelf (OCS) permitting program to support renewal of the OCS Information Collection Request (ICR); ICR Reference Number 202405-2060-006; OMB Control Number 2060-0249

To Whom It May Concern:

Thank you for the opportunity to provide comments in response to the burden hour information associated with the Outer Continental Shelf (OCS) permitting program to support renewal of the Environmental Protection Agency's (EPA) OCS Information Collection Request (ICR). The National Ocean Industries Association (NOIA) and the Offshore Operators Committee (OOC) represent companies engaging in oil and natural gas operations, alternative energy, and deep sea mining on the U.S. outer continental shelf (OCS). As it relates to the subject ICR, NOIA and OOC represent operators and developers who are required to submit air permits to the EPA, as appropriate, for offshore energy activities on the OCS.

Based on feedback from our member companies, who have direct experience with the associated record-keeping and reporting, the burden-hour estimates provided by the EPA are not reasonable, as they underestimate the actual hours attributable to each activity. In fact, the burden-hour estimate is significantly underestimated for certain activities. Please see the following page for the industry estimate of the current burden hours associated with the activities. The differences in burden hours between offshore oil and gas and alternative energy sources are attributable to a variety of factors, including differences in equipment, facilities, operations, and the maturity of the respective sectors.

Offshore Energy Industry Burden Hour Estimates:

Activities	New And Previously Permitted O&G Exploration Sources		New And Previously Permitted O&G Development/Production Sources		New And Previously Permitted Alternative Energy Sources ¹	
	Hours per permit ²	Contractor hours per permit ³	Hours per permit ²	Contractor hours per permit ³	Hours per permit ²	Contractor hours per permit ³
Read regulations	5	5	5	5	10	10
Consult with permitting authority	5	5	5	5	30	30
Prepare a Notice of Intent to construct	40	40	40	40	50	100
Prepare major source permit application	50	293	100	585	1,000	3,000
Prepare minor source permit application	25	146	50	293	n/a	n/a
Perform compliance testing	100	764	100	764	100	40
Prepare operating permit application	42	42	42	42	8	55
Conduct recordkeeping and report data	200	200	200	200	240 per year	374 per year

Other Relevant and Significant Factors for Consideration

Offshore Oil and Gas:

It is important to highlight that EPA permitting does not apply to OCS operations in the Central/Western Gulf of America (specifically west of 87.5 degrees longitude) and the OCS areas offshore of Alaska's North Slope Borough. Operators do not need EPA air permits in the Western and Central Planning areas of the Gulf of America, a portion of the Eastern Planning Area of the Gulf of America, and the Alaskan area because Congress has specifically authorized the U.S. Department of the Interior to regulate air emissions in those areas. Permitting efficiency and streamlining is a stated priority of the Trump Administration, so it is important to reiterate this division of authority.

Alternative Energy Sources:

The EPA OCS air permit program has been a particularly challenging framework for alternative energy sources. For example, the requirement to secure Clean Air Act permits for temporary construction vessel emissions miles offshore is overly burdensome and ripe for streamlining. Streamlining of this program would directly reduce energy costs, accelerate the deployment of domestic energy, and unlock further investment in domestic manufacturing, port infrastructure, and workforce development. Furthermore, the adaptation of air regulations to alternative energy sources has largely been implemented independently by each region. EPA can work to reduce the burden hours by implementing a program with greater consistency across regions.

Conclusion

NOIA, OOC, and our members stand ready to work with the EPA on regulatory matters under its jurisdiction related to offshore energy and mineral development. Please contact Erik Milito (milito@noia.org) with any follow-up questions or to set up a meeting.

Very respectfully,



Erik Milito, President
National Ocean Industries Association



Evan Zimmerman, Executive Director
Offshore Operators Committee