

SUPPORTING STATEMENT

National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR part 63, subpart BBBBBB)

1. Identification of the Information Collection

(a) Identification of the Information Collection

"National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR part 63, subpart BBBBBB)." This is a new information collection request (ICR) that has been assigned Environmental Protection Agency (EPA) ICR number 2237.01.

(b) Short Characterization

This ICR is prepared for an EPA rulemaking developed under authority of Section 112 of the Clean Air Act (Act). The final rule amends title 40, chapter I, part 63 of the Code of Federal Regulations (CFR) by adding a new subpart BBBBBB--National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities. These national emission standards include standards for area sources of hazardous air pollutants (HAP).

Respondents are owners or operators of new or existing gasoline distribution facilities subject to these national emission standards for hazardous air pollutants (NESHAP). In addition to the initial notification and notification of compliance status required by the General Provisions to 40 CFR part 63, subpart A, respondents are required to submit one-time reports of start of construction, anticipated and actual startup dates, and physical or operational changes to existing facilities. Reports of initial performance tests on control devices at gasoline distribution storage tanks and loading racks are also required and are necessary to show that the installed control devices are meeting the emission limitations required by the NESHAP. Annual reports of storage tank inspections at all affected facilities

are required. In addition, respondents must submit semiannual compliance and continuous monitoring system performance reports, and semiannual reports of equipment leaks not repaired within 15 days or loadings of cargo tanks for which vapor tightness documentation is not available. All records are to be maintained for at least 5 years. All reports are to be submitted to the respondent's State or local agency, whichever has been delegated enforcement authority by the EPA. The information is to be used to determine whether all sources subject to the NESHAP are achieving the standards.

We estimate that the number of potentially affected sources under this rule may be as high as 250,000, with the gasoline dispensing facility segment alone accounting for about 240,000 of these facilities. However, a large percentage of these facilities are already complying with this rule as a result of their compliance with applicable State and local rules. We have minimized or eliminated the reporting and recordkeeping requirements under this rule for most of those sources. Therefore, the total estimated number of affected sources under this rule is 11,160. Also, there are no new or reconstructed facilities expected within the larger, bulk segment of the industry and new gasoline dispensing facilities are expected to be subject to State and local rules. Thus, we have developed this ICR with the expectation that only existing sources will be subject to the reporting and recordkeeping requirements of the rule. We have, however, included a description of the notifications that would be required if new affected sources are constructed.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Act, as amended, to establish NESHAP. Section 114 of the Act allows the Administrator to require inspections, monitoring, and entry into facilities to ensure compliance with a section 112 emission standard. Section 114(a)(1) specifically states:

"The Administrator may require any person who owns or operates any emission source ... who is subject to the provisions of this Act on a one-time, periodic, or continuous basis 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;
- (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."

Effective enforcement of this rule is necessary due to the hazardous nature of the HAP compounds found in the gasoline stored, transferred, and distributed at these facilities. In total, this NESHAP will regulate 9 HAP compounds normally found in gasoline:

- Benzene
- Ethylbenzene
- Hexane
- Toluene
- Xylenes
- Isooctane
- Naphthalene
- Cumene
- Methyl tert-butyl ether

Certain records and reports are necessary: (1) to enable the EPA to identify new and existing sources subject to the standards, and (2) to assist the EPA and State agencies to which enforcement has been delegated in determining compliance with the standards.

(b) Practical Utility/Users of the Data

The information will be used by agency enforcement personnel to: (1) identify sources subject to the standards, (2) ensure that emissions from storage tanks are minimized and rim seal and fitting defects are repaired on a timely basis, (3) ensure that

emission control devices are being properly operated and maintained, and (4) ensure that emissions due to leakage (both liquid and vapor) from cargo tanks and process piping equipment components during transfer are being minimized.

In addition, records and reports are necessary to enable the EPA to identify facilities that may not be in compliance with the standards. Based on reported information, the EPA can decide which facilities should be inspected and what records or specific emission sources should be inspected at each facility. Also, the records that facilities maintain provide an indication to the EPA as to whether facility personnel are operating and maintaining control equipment properly.

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

(a) Non-duplication

Some of the facilities subject to this NESHAP will also be subject to requirements under 40 CFR part 60 New Source Performance Standards (NSPS), subparts K, Ka, Kb, and XX. Some operations also occupy the same plant site as facilities complying with other NESHAP such as 40 CFR part 63, subpart CC (the Refinery NESHAP). The burden requested for this NESHAP does not duplicate any of the burden accounted for under the mentioned NSPS or NESHAP subparts.

Certain reports required by State or local agencies may duplicate information required by these standards. In such cases, a copy of the report submitted to the State or local agency may be sent to the Administrator in lieu of the report required by the standards.

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

A Federal Register notice was not published soliciting comments on burden estimates for this ICR.

(c) Consultations

The Gasoline Distribution - Area Sources NESHAP was developed with the help of industry stakeholders. Industry stakeholders were informed of the project's progress in two stakeholder meetings conducted in Research Triangle Park, North Carolina. Table 1 contains the names, affiliations, and phone numbers of

stakeholders involved in the rulemaking effort. These stakeholders were consulted during all phases of this NESHAP development.

Table 1. List of People Consulted in Gasoline Distribution NESHAP Development

Name	Organization	Position	Telephone
Charles Bennett	Marathon Petroleum Co.	Corporate Environment, Safety & Security	606-921-3636
Judy Bigon	ExxonMobil		281-848-3506
Rob Ferry	TGB Partnership	Consultant	919-644-8250
Clay R. Freeberg	Chevron	Policy, Government & Public Affairs	925-842-3451
Joseph Green	SIGMA and NACS		202-342-8451
Moraima Grinnell	ExxonMobil		
Kimber Hamilton	Marathon Petroleum Co.	Corporate Environment, Safety & Security	419-421-2891
Terri Holloman	Magellan Pipeline		
Tom Kelly	Colonial Pipeline		
Jan L. Laughlin	ConocoPhillips	Regulatory Issues Coordinator	281-293-1142
Tim L. Laughlin	North Carolina Petroleum Marketers Association	Technical Director	919-782-4411
Usha Mehra	ILTA/GATX Terminals Corporation	Environmental, Health and Safety Manager-Gulf Region	713/450-0400
Jack McClure	Shell		
Matthew A. Todd	API	Regulatory Analysis and Scientific Affairs	202/682-8319
Doug Vopat	BP		216-271-8189
Peter Weaver	ILTA		

(d) Effects of Less Frequent Collection

The reporting requirements for facilities subject to the NESHAP consist of certain one-time reports and a minimal amount of periodic recordkeeping and reporting. At new and existing

gasoline distribution facilities (depending on the type of facility), inspections and corresponding records and reports of storage tanks, loading rack control devices and monitored operating parameters, and equipment components are required. If this information was collected less frequently, the main consequence would be poor operation and maintenance of control devices, equipment components, and storage tanks. Consequently, increased HAP emissions could result.

(e) General Guidelines

The proposed rule requires records to be retained for 5 years, which is consistent with the General Provisions of 40 CFR part 63 and the part 70 operating permit requirements (Title V). While facilities affected by this rule are typically required to obtain operating permits from applicable State or local agencies, this rule does not require that affected sources obtain a Title V permit. The 5-year retention requirement exceeds the 3-year retention period required by 5 CFR 1320.6; however, none of the other guidelines in 5 CFR 1320.6 is being exceeded.

(f) Confidentiality

Any information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to Agency policies as set forth in Title 40, chapter 1, part 2, subpart B--Confidentiality of Business Information (see 40 CFR part 2; 40 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; and 44 FR 17674, March 23, 1979).

(g) Sensitive Questions

This section is not applicable. Information to be collected has been determined to not be of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes

Respondents are owners or operators of gasoline distribution facilities subject to the NESHPA. Table 2 below provides the primary NAICS codes that apply to facilities that conduct gasoline distribution operations.

Table 2. Affected Industry Segments and their Industry Classifications

Industry Segment	NAICS Codes
Pipeline transportation of refined petroleum products	486910
Bulk gasoline terminals and bulk plants	424710
Gasoline stations with convenience stores	447110
Gasoline stations without convenience stores	447190
Hazardous materials trucking - local	48422
Hazardous materials trucking - long distance	48423

Gasoline distribution activities may also occur at some facilities with other NAICS codes not listed in the table above.

(b) Information Requested

(i) Data items, including recordkeeping requirements

(1) Gasoline Distribution Facilities. The following types of one-time reports are required for sources affected by this NESHAP.

- For existing sources, a report filed within 1 year subsequent to the effective date of the NESHAP, notifying the Administrator that the facility is subject to the relevant standards (Initial Notification). Information to be provided in the report is detailed in §63.9(b)(2) of subpart A, General Provisions. For the smaller facilities affected by this NESHAP (bulk plants and gasoline dispensing facilities), a simplified example Initial Notification form has been provided for industry use.

- For new sources [for which approval of construction or reconstruction is not required under §63.5(d)], an Initial Notification filed within 120 days after startup of the source, notifying the Administrator that the facility is subject to the relevant standards, as provided in §63.9(b)(3). Information to be provided in the report is detailed in §63.9(b)(2). For the smaller facilities affected by this NESHAP (bulk plants and gasoline dispensing facilities), a simplified example Initial Notification form has been provided for industry use.
- Notification of anticipated construction or reconstruction of a source subject to a relevant standard not later than 180 days prior to commencement of construction or reconstruction as indicated in §63.9(b)(5).
- Notification of anticipated date of initial startup not more than 60 days nor less than 30 days prior to such date [§63.9(b)(4)(iv)].
- Notification of the actual date of startup, within 15 days after such date [§63.9(b)(4)(v)].
- Notification of construction or reconstruction not later than 30 days after the change is commenced [§63.9(b)(4)(iii)].
- Notification of installation of a new control device or reconstruction of an existing control device within 180 days before the installation or reconstruction is planned to commence [§63.5(b)(6) and §63.5(d)(1)].
- Within 180 days after initial startup, installation of a control device, or refurbishment of an existing control device, the owner or operator of the facility must conduct a performance test and furnish the Administrator with a written report [§63.7(a)].
- The owner or operator of an affected facility must notify the Administrator at least 60 days prior to the date of a performance test [§63.9(e)].
- A request for an extension of compliance must be submitted if the owner or operator cannot comply with the standard by

the designated date [§63.9(c)].

- The owner or operator must report any reconstruction of an affected facility as defined in §63.5.
- A Notification of Compliance Status must be submitted within 60 days after compliance of the affected facility has been established, pursuant to §63.9(b)(2). For the smaller facilities affected by this NESHAP (bulk plants and gasoline dispensing facilities), a simplified example Notification of Compliance Status form has been provided for industry use.

(2) The following periodic reports and record maintenance are required for the affected sources.

- A semiannual compliance report is to be submitted which indicates any deviations from the standards [§63.11095(b)].
- Records of annual and other inspections are to be kept as specified in §63.11094(a) and (e).
- Copies of all submitted notifications and reports, including performance test results are to be maintained by the source in accordance with §63.11094(b).
- A continuous record of operating parameter monitoring data, as well as specific records to ensure that the monitoring activities will provide an indication of the facility's compliance, are to be kept pursuant to §63.11094(b) and (f).

Records required by this NESHAP must be retained by the owner or operator for 5 years in accordance with §63.11094(a). This information and data will be viewed and analyzed by agency personnel during periodic visits, approximately once a year, to the respondents' gasoline distribution facilities.

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

(a) Agency Activities

The EPA will conduct the following activities in connection with the acquisition, analysis, and storage of the information required under 40 CFR part 63, subpart "BBBBBB":

- Observe initial and repeat performance tests,
- Review notifications and reports, including compliance reports, required to be submitted by industry,
- Audit facility records, and
- Compile data in the AIRS database.

(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to verify that the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to determine a source's initial capability to comply with the emission limitations, and to note the operating conditions under which compliance was achieved. Data obtained during periodic visits by Agency personnel from records maintained by the respondents are tabulated and published for internal Agency 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 these reports is entered into the Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS) which is operated and maintained by the EPA's Office of Air Quality Planning and Standards. The AFS is the EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. The EPA uses AFS for tracking air pollution compliance and enforcement by local and State regulatory agencies, and EPA Regional Offices and Headquarters. The EPA can edit, store, retrieve, and analyze the data via PC terminals.

(c) Small Entity Flexibility

Even though the recordkeeping requirements are the same for small and large businesses, the Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses. Construction, modification, and reconstruction reports take very little time to complete and are filed only once. Equipment leak monitoring and storage tank inspection records are brief, and cargo tank vapor tightness documentation will be supplied primarily by independent cargo tank operators and kept at the gasoline distribution facility for each cargo tank and railcar that is to be loaded at the facility.

(d) Collection Schedule

Information contained in the one-time-only reports will be entered into the AIRS facility subsystem. Data obtained during periodic visits by Agency personnel from records maintained by the respondents and reports submitted by the respondents to the EPA will be tabulated and published for internal EPA use in compliance enforcement programs. A schedule for the collection of information and publication of data is not applicable because reports and recordkeeping are triggered by actions of the respondents.

6. Estimating the Burden and Cost of the Collection

Tables 3 and 4 document the computation of individual burdens for each of the recordkeeping and reporting requirements applicable to the respondents complying with this standard. 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.

(a) Estimating Respondent Burden

The average annual burden for gasoline distribution facilities over the next 3 years is estimated at 204,111 person-hours, as indicated in Table 4. These hours are based on Agency studies and background documents from the development of the standards or test methods, and Agency knowledge and experience with the NESHAP program.

For the purposes of these estimates, we have presented the requirements by facility type (bulk terminal, pipeline breakout station, pipeline pumping station, bulk plant, and gasoline dispensing facility) because the requirements differ by facility type. The numbers of facilities estimated to be impacted by this rule were derived from information on existing State and local control levels for this source category and from information obtained from industry publications and contacts.

(b) Estimating Respondent Costs

(i) Estimating labor costs

The primary costs of complying with the information collection activity are associated with labor costs. The labor estimates used in Tables 3 and 4 were derived from standard estimates based on the EPA's experience with other standards. The costs to conduct this effort have been calculated on the basis of:

\$64.95 per hour for Technical Labor
\$73.89 per hour for Managerial Labor
\$31.79 per hour for Clerical (Support) Labor

These labor rates are from the United States Department of Labor, Bureau of Labor Statistics, "National Compensation Survey: Occupational Wages in the United States, July 2004" (issued August 2005). The reported labor rates (wages) have been increased by 125% to account for the benefit packages available to those employed by private industry.

(ii) Capital/Start-Up vs. Operating and Maintenance (O&M) Costs

No capital costs were included in the estimated monitoring, reporting, and recordkeeping costs because the types of monitors that are required by the rule (operating parameter monitors for vapor processors) are typically included as a standard component of the control device itself. The cost of operating and maintaining these monitors was estimated to be \$2,500 per year. Emissions testing costs were estimated for Method 18, Method 25A, and Method 27. Methods 18 and 25A will be used to measure emissions of HAP from control devices. The cost of Method 18 and 25A testing was provided by the emissions testing staff at MACTEC. Method 27 is used to test cargo tanks for vapor tightness (leakage). Based upon current information provided by industry, the cost of preparing for and performing a Method 27 test has been estimated to be \$395. The other monitoring activities required by the rule involve only labor costs.

(c) *Estimating Agency Burden and Cost*

The only Federal costs are user costs associated with analysis of the reported information. Publication and distribution of the information are part of the operation of the AFS. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program.

The annual Federal Government cost during the first 3 years of the ICR is estimated to be \$1,577,740, as shown in Table 6. Labor rates used in estimating the annual cost are as follows:

\$58.88 per hour for Technical Labor
\$82.76 per hour for Managerial Labor
\$36.76 per hour for Clerical Labor

These rates are from the Office of Personnel Management (OPM) 2005 General Schedule, which excludes locality rates of pay. The rates on the table were multiplied by 100 % to take benefits into account.

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

We estimate that the number of potentially affected sources under this rule may be as high as 250,000. However, the gasoline dispensing facility segment alone accounts for about 240,000 of these facilities. In addition, a large percentage of the total facilities in the gasoline distribution industry are already regulated by State and local rules that are as at least as stringent as this NESHAP. As a result of these facts, we have included provisions in the rule to allow those facilities that are complying with the requirements of State and local rules to minimize the burden of this NESHAP. For example, gasoline dispensing facilities that are located in States with submerged fill requirements will have no reporting or recordkeeping requirements under the NESHAP. Also, other types of facilities that are complying with the NESHAP by virtue of their compliance with State or local rules will be allowed to utilize performance tests and monitoring results performed as a condition of their State or local permit to satisfy the requirements of the NESHAP. Within the primary industry segments in the source category, it is estimated that the following numbers of affected area source facilities will incur a reporting or recordkeeping burden as a result of the NESHAP:

1,100	Bulk terminals
460	Pipeline breakout stations
1,800	Pipeline pumping stations
5,900	Bulk Plants
<u>1,900</u>	<u>Gasoline dispensing facilities</u>
11,160	Total facilities

(e) Bottom Line Burden Hours and Costs Tables

(i) Respondent tally

See Table 4.

(ii) The agency tally

See Table 6.

(iii) Variations in the annual bottom line

Not applicable as this is a new ICR.

(f) Reasons for Change in Burden

Not applicable as this is a new ICR.

(g) Burden Statement

The average annual burden estimates are presented in Tables 3 through 6. For all gasoline distribution facilities, the average annual burden per facility over the first 3 years is approximately 20 hours. This estimate includes time for preparing and submitting notices, preparing and submitting demonstrations and applications, reporting releases, gathering information, and preparing and submitting reports. It should be noted that the burden for the smaller facilities (bulk plants and gasoline dispensing facilities), the average burden is significantly less than the overall average.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No.EPA-HQ-OAR-2006-0406, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket, EPA/DC, EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. Use this website to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW., Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA Docket ID No. (EPA-HQ-OAR-2006-0406) and OMB control number 2060-NEW in any correspondence.

NOTE: The EPA Docket Center suffered damage due to flooding during the last week of June 2006. The Docket Center is continuing to operate. However, during the cleanup, there will be temporary changes to Docket Center telephone numbers, addresses, and hours of operation for people who wish to visit the Public Reading Room to view documents. Consult EPA's Federal Register notice at 71 FR 38147 (July 5, 2006) or the EPA website at www.epa.gov/epahome/dockets.htm for current information on docket status, locations and telephone numbers.

Table 3.1 Annual Respondent Burden and Costs

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year*	Total Technical Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
3.1 Bulk Terminals												
(a) Read and understand rule requirements	8	1		8	367	2,936	162,114	21,694	4,667	188,475		188,475
(b) Prepare Initial Notification	10	1		10	367	3,670	202,643	27,118	5,833	235,594		235,594
(c) Perform Initial Performance Test	175	1		175	4	700	38,651	5,172	1,113	44,936		44,936
(d) Prepare Notification of Compliance Status	16	1		16	367	5,872	324,228	43,388	9,334	376,950		376,950
(e) Operation and Maintenance of operating parameter monitoring system	10	1	2,500	10	110	1,100	60,738	8,128	1,748	70,614	275,000	345,614
(f) Perform annual storage tank inspection	12	1		12	550	6,600	364,426	48,767	10,491	423,684		423,684
(g) Perform equipment leak inspections	2	12		24	550	13,200	728,851	97,535	20,981	847,367		847,367
(h) Keep records of performance tests, storage tank and equipment leak inspections, and cargo tank vapor tightness documentation	18	1		18	1,100	19,800	1,093,277	146,302	31,472	1,271,051		1,271,051
(i) Submit semiannual compliance report	6	2		12	1,100	13,200	728,851	97,535	20,981	847,367		847,367
						67,078				4,306,039		4,581,039

Notes for Table 3.1:

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 1,100 affected sources (367) completed these activities during each of the first 3 years.
- Assumed that 1 % of bulk terminals (11) will perform a new performance test on a vapor processor and that 1/3 (4) will conduct test during each of the first 3 years.
- Assumed that 10 % of bulk terminals (110) must install operating parameter monitoring systems.
- Assumed that 50 % of bulk terminals (550) must begin performing annual storage tank inspections and quarterly equipment leak inspections.

Table 3.2 Annual Respondent Burden and Costs (Continued)

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Technical Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
3.2 Pipeline Breakout Stations												
(a) Read and understand rule requirements	6	1		6	153	918	50,688	6,783	1,459	58,931		58,931
(b) Prepare Initial Notification	8	1		8	153	1,224	67,584	9,044	1,946	78,574		78,574
(c) Prepare Notification of Compliance Status	8	1		8	153	1,224	67,584	9,044	1,946	78,574		78,574
(d) Perform annual storage tank inspection	12	1		12	230	2,760	152,396	20,394	4,387	177,177		177,177
(e) Perform equipment leak inspections	2	12		24	230	5,520	304,792	40,787	8,774	354,354		354,354
(f) Keep records of storage tank and equipment leak inspections	8	1		8	460	3,680	203,195	27,192	5,849	236,236		236,236
(g) Submit semiannual compliance report	2	2		4	460	1,840	101,597	13,596	2,925	118,118		118,118
						17,166				1,101,963		1,101,963

Notes for Table 3.2:

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 460 affected sources (153) completed these activities during each of the first 3 years.
- Assumed that 50 % of pipeline breakout stations (230) must begin performing annual storage tank inspections and quarterly equipment leak inspections.

Table 3.3 Annual Respondent Burden and Costs (Continued)

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Technical Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
3.3 Pipeline Pumping Stations												
(a) Read and understand rule requirements	4	1		4	600	2,400	132,518	17,734	3,815	154,067		154,067
(b) Prepare Initial Notification	4	1		4	600	2,400	132,518	17,734	3,815	154,067		154,067
(c) Prepare Notification of Compliance Status	4	1		4	600	2,400	132,518	17,734	3,815	154,067		154,067
(d) Perform equipment leak inspections	1	12		12	1,800	21,600	1,192,666	159,602	34,333	1,386,601		1,386,601
(e) Keep records of equipment leak inspections	8	1		8	1,800	14,400	795,110	106,402	22,889	924,401		924,401
(f) Submit semiannual compliance report	2	2		4	1,800	7,200	397,555	53,201	11,444	462,200		462,200
						50,400				3,235,403		3,235,403

Notes for Table 3.3:

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 1,800 affected sources (600) completed these activities during each of the first 3 years.

Table 3.4 Annual Respondent Burden and Costs (Continued)

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Technical Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
3.4 Bulk Plants												
(a) Read and understand rule requirements (in States without submerged fill rules)	4	1		4	492	1,968	108,665	14,542	3,128	126,335		126,335
(b) Read and understand rule requirements (in States with submerged fill rules)	1	1		1	1,475	1,475	81,444	10,899	2,345	94,687		94,687
(c) Prepare Initial Notification	4	1		4	492	1,968	108,665	14,542	3,128	126,335		126,335
(d) Prepare Notification of Compliance Status	4	1		4	492	1,968	108,665	14,542	3,128	126,335		126,335
(e) Perform equipment leak inspections	0.5	12		6	5,900	35,400	1,954,646	261,571	56,268	2,272,485		2,272,485
(f) Keep records of equipment leak inspections	2	1		2	5,900	11,800	651,549	87,190	18,756	757,495		757,495
(g) Submit semiannual compliance report	2	2		4	59	236	13,031	1,744	375	15,150		15,150
						54,815				3,518,822		3,518,822

Notes for Table 3.4:

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 5,900 affected sources (1967) completed these activities during each of the first 3 years (492 in States without bulk plant rules and 1475 in States with rules).
- Assumed that, on an annual average basis, 1 percent of facilities (59) will be required to submit a semiannual compliance report because of delays in repairing equipment leaks.

Table 3.5 Annual Respondent Burden and Costs (Continued)

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Technical Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
3.5 Gasoline Dispensing Facilities												
(a) Read and understand rule requirements (in States without submerged fill rules)	4	1		4	633	2,532	139,807	18,709	4,025	162,540		162,540
(b) Read and understand rule requirements (in States with submerged fill rules)	1	1		1	9,588	9,588	529,411	70,846	15,240	615,497		615,497
(c) Prepare Initial Notification	2	1		2	633	1,266	69,903	9,354	2,012	81,270		81,270
(d) Prepare Notification of Compliance Status	2	1		2	633	1,266	69,903	9,354	2,012	81,270		81,270
						14,652				940,578		940,578

Notes for Table 3.5:

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities that will occur only in States that do not have rules requiring submerged fill. Assumed 1/3 of the 1,900 estimated affected sources (633) completed these activities during each of the first 3 years.
- For affected source facilities located in States with submerged fill requirements, there are no other reporting or recordkeeping requirements.
- While we have assumed that about 28,800 facility owners and operators in States with submerged fill requirements will read this rule (9,588 per year for each of the first three years), there is no notification or report required for these facilities. Thus, these owners and operators were not included in the final estimated number of "respondents" for this rule.

Table 4. Total Estimated Respondent Burden and Cost Summary

Average Number of Respondents per year over the First 3 Years	Average Number of Activities per Respondent	Total Annual Hours ^a	Average Hours per Facility per Year ^b	Total Labor Cost per Year ^c	Total Annual O&M Costs ^d	Total Annual Cost Over the First 3 Years ^e	Average Annual Cost per Facility Over the First 3 Years
9,893	10	204,111	21	\$13,102,805	\$275,000	\$13,377,805	\$1,352

Notes for Table 4:

- a) Estimated by summing the annual technical, managerial, and clerical hours for all facility types and activities.
- b) Obtained by dividing total annual hours by the number of respondents.
- c) Includes technical, managerial, and clerical hours.
- d) Includes the cost of operating and maintaining the parameter monitoring system for vapor processors.
- e) Includes the cost of performance testing.

Table 5. Annual Federal Government Burden and Costs

Burden Item	Number of Activities per Year	EPA Hours per Activity	Total EPA Hours for Item	Technical Hours per Year @ \$58.88/hr	Management Hours per Year @ \$82.76/hr	Clerical Hours per Year @ \$36.76/hr	EPA Cost per Year (\$/yr)
Review initial notifications	2,245	2	4,490	211,497	37,159	16,505	265,161
Review notification of performance testing	4	2	8	377	66	29	472
Review performance test results	4	8	32	1,507	265	118	1,890
Review notification of compliance status	2,245	2	4,490	211,497	37,159	16,505	265,161
Review of storage tank inspection reports	780	4	3,120	146,964	25,821	11,469	184,255
Review semiannual compliance reports	6,838	2	13,676	644,194	113,183	50,273	807,650
Review of other, non-routine reports	225	4	900	42,394	7,448	3,308	53,150
			26,716				1,577,740

Notes for Table 5:

- Number of activities per year is the sum of the number of applicable respondents from Tables 3.1 through 3.5.
- Assumed that 10 percent of affected facilities industry-wide will submit non-routine reports each year.

Table 6. Total Estimated Agency Burden and Cost Summary

Number of Industry Respondents	Number of Agency Activities ^a	Average Annual Hours ^b	Average Hours per Industry Respondent	Total Annual Labor Cost ^b
4,485	10	26,716	6	\$1,577,740