

**SUPPORTING STATEMENT**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**October 2006**

The Consolidated Federal Air Rule for SOCFMI (with Proposed Changes to Subpart VV)

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

The Consolidated Federal Air Rule for SOCFMI (Proposed changes)

**1(b) Short Characterization/Abstract**

This information collection request (ICR) is for the Consolidated Federal Air Rule (CAR) for the Synthetic Organic Chemical Industry (SOCMI) and its referencing subparts. The burden estimates in this ICR reflect proposed changes to subpart VV; other burden estimates are consistent with the most recently approved ICR for the CAR. EPA will use this information to ensure compliance with the provisions in the CAR and its referencing subparts.

All existing sources must be in compliance with the requirements of the CAR and/or its referencing subparts within three years of the effective date (i.e., promulgation date) of the appropriate standard for the affected source. All new sources must be in compliance with the requirements of the CAR and/or its referencing subparts upon startup or the promulgation date of standards for an affected source, whichever is later. Compliance is assumed through initial performance testing or design analysis, as appropriate, and ongoing compliance is demonstrated through parametric monitoring. Types of parameters monitored are incinerator temperature, scrubber flow rate, carbon adsorber regeneration frequency as well as others. The appropriate parameter to monitor depends on the type of control device with the owner or operator chooses to comply.

On December 14, 2000, the CAR was promulgated under 40 CFR part 65. The CAR is an optional alternative compliance approach for plant sites that must comply with existing subparts in the Code of Federal Regulations (CFR). The CAR is a consolidation of major portions of 14 different New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) pertaining to storage vessels, process vents, transfer racks, and equipment leaks, and the general provisions for the three applicable parts (40 CFR parts 60, 61, and 63). These subparts from 40 CFR parts 60, 61, and 63 are referred to as "referencing subparts" because they have been amended to refer to the CAR as a compliance alternative. The referencing subparts include 40 CFR part 60, subpart Ka; 40 CFR part 60, subpart Kb; 40 CFR part 60, subpart VV; 40 CFR part 60, subpart DDD; 40 CFR part 60, subpart III; 40 CFR part 60, subpart NNN; 40 CFR part 60, subpart RRR; 40 CFR part 61, subpart BB; 40 CFR part 61, subpart Y; 40 CFR part 61, subpart V; 40 CFR part 63, subpart F; 40 CFR part 63, subpart G; 40 CFR part 63, subpart H; and 40 CFR part 63, subpart I.

Compliance with the CAR is a voluntary alternative; sources may continue to comply with existing applicable rules or may choose to comply with the consolidated rule. When preparing renewals for the CAR, or the referencing subparts, estimates are made of the percentage of existing sources that will opt to comply with the CAR in lieu of the referencing subparts. Because the CAR is designed for, although not limited to, SOCOMI facilities, the number of facilities opting to comply with the CAR is based on the estimated number of SOCOMI facilities. It is estimated that 25 percent of non-Hazardous Organic National Emission Standards for Hazardous Air Pollutants (HON) sources will opt to comply with the CAR if the per-source burden of complying with the CAR is less than the per-source burden of complying with the referencing subpart. For those referencing subparts for which the per-source burden of complying with the CAR is higher than the per-source burden of complying with the referencing subpart (subparts Ka, Kb, Y, VV, III, NNN, RRR, and DDD), it is estimated that 5 percent of sources will opt to comply with the CAR. It is also estimated that 25 percent of HON sources will opt to comply with the CAR. It is assumed that all new sources will initially comply with the appropriate referencing subpart.

It is estimated that the consolidated collection will involve 3,349 respondents with 10,019 annual responses and Respondent Labor costs of \$126,765,675. The total burden is estimated to be 1,999,723 hours per year. Total capital costs will be \$3,377,000 per year and total capital and O&M costs will be \$95,333,000 per year.

#### The CAR (Consolidated Air Rule)

In general, the NSPS, NESHAP, CAR and MACT regulations require initial notifications including one-time notifications of initial startup, applicability, and initial compliance status; performance tests, periodic monitoring, recordkeeping, and reporting. Periodic reports are required semiannually, and a startup, shutdown, and malfunction plan must be submitted and updated as needed. In addition, respondents taking advantage of various provisions for waivers, approval of alternative methods, and changes in submittal schedules would be required to submit requests or applications. This information is being collected to assure compliance with 40 CFR part 65.

#### NSPS subpart Ka: Storage Vessels for Petroleum Liquids

The New Source Performance Standards (NSPS) for subpart Ka were proposed on May 18, 1978 and promulgated on April 4, 1980. These standards apply to the following facilities in subpart Ka: Storage Vessels of petroleum liquids that have a storage capacity greater than 151,416 (40,000 gallons), and for which construction, reconstruction or modification commenced after May 18, 1978 and prior to July 23, 1984. There is a de minimis exemption located at 40 CFR part 60.110a(b). The regulated pollutants are volatile organic compounds (VOC). The universe of sources subject to NSPS subpart Ka is closed. Any new sources will be subject to NSPS subpart Kb, the most recent VOC standard applicable to storage vessels. This information is being collected to assure compliance with 40 CFR part 60, subpart Ka.

#### NSPS subpart Kb: Volatile Organic Liquid (VOL) Storage Vessels

The New Source Performance Standards (NSPS) for subpart Kb were proposed on July 23, 1984 and promulgated on April 8, 1987. These standards apply to each storage vessel with a capacity greater than or equal to 40 cubic meters that is used to store volatile organic liquids, for which construction, reconstruction or modification commenced after July 23, 1984. There are exemptions for specific storage vessels listed in 40 CFR part 60.110b(b), 60.110b(c), and 60.110b(d). The standards include visual inspection, leak detection, and repair for equipment configurations including fixed and floating roofs. The regulated pollutant is VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart Kb.

#### NSPS subpart VV: Equipment Leaks of VOC in the SOCOMI Industry

The New Source Performance Standards (NSPS) for Emissions of Volatile Organic Compounds (VOC) from Equipment Leaks in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) were proposed on January 5, 1981. These standards were promulgated on October 18, 1983. They apply to specific pieces of equipment contained within a process unit in the synthetic organic chemicals manufacturing industry which was constructed, modified or reconstructed after the date of proposal, and which produce as an intermediate or final product, one or more of the chemicals listed in 60.489. These include pumps in light liquid service, compressors, pressure relief devices in gas/vapor service, sampling connection systems, open-ended valves or lines, valves in gas/vapor service and light liquid service, pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service and flanges and other connectors. The regulated pollutants are VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart VV.

#### NSPS subpart DDD: VOC Emissions from the Polymer Manufacturing Industry

The New Source Performance Standards (NSPS) for the polymer manufacturing industry were proposed on September 30, 1987, and January 10, 1989, and promulgated on December 11, 1990. These standards apply to the following affected facilities involved in the manufacture of polypropylene, polystyrene, or poly(ethylene terephthalate) commencing construction, modification or reconstruction after the date of proposal or after January 10, 1989, depending on the process section. The affected facilities include: 1) For polypropylene and polyethylene manufacturing: each raw material preparation section, each polymerization reaction section, each material recovery section, each product finishing section, and each product storage; 2) For polystyrene manufacturing processes: each material recovery section; and 3) For polyethylene (terephthalate) manufacturing: each polymerization reaction section. For equipment leaks, the affected facilities are each group of fugitive emissions equipment within any process unit. The regulated pollutants are VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart DDD.

### NSPS subpart III: VOC Emissions from SOCOMI Air Oxidation Unit Processes

The New Source Performance Standards (NSPS) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes were proposed on October 21, 1983, and promulgated on June 29, 1990. These standards apply to the following facilities for which construction, modification or reconstruction is commenced after the date of proposal: 1) Each air oxidation reactor not discharging its vent stream into a recovery device; 2) Each combination of an air oxidation reactor and the recovery system into which its vent stream is discharged; 3) Each combination of two or more air oxidation reactors and the common recovery system into which their vent streams are discharged. The standard applies to the affected facility which produces one or more of the chemicals listed in 60.617 as a product, co-product, byproduct or intermediate. The regulated pollutant is VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart III.

### NSPS subpart NNN: VOC Emissions from SOCOMI Distillation Operations

The New Source Performance Standards (NSPS) for the synthetic organic chemical manufacturing industry (SOCMI) Distillation Operations were proposed on December 30, 1983 and promulgated on June 29, 1990. These standards apply to the following facilities for which construction, modification or reconstruction is commenced after the date of proposal: 1) Each distillation unit not discharging its vent stream into a recovery device; 2) Each combination of a distillation unit and the recovery system into which its vent stream is discharged; 3) Each combination of two or more distillation units and the common recovery system into which their vent streams are discharged. The standard applies to affected facilities producing one or more of the chemicals listed in 60.667 as a product, co-product, by-product, or intermediate. The regulated pollutant is VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart NNN.

### NSPS subpart RRR: VOC Emissions from SOCOMI Reactor Processes

The New Source Performance Standards (NSPS) for the synthetic organic chemical manufacturing industry (SOCMI) Reactor Processes were proposed on June 29, 1990, and promulgated on August 31, 1993. These standards apply to affected facilities commencing construction, modification or reconstruction after the date of proposal: (1) Each reactor process not discharging its vent stream into a recovery system; (2) Each combination of a reactor processes and the recovery system into which its vent stream is discharged; (3) Each combination of two or more reactor processes and the common recovery system into which their vent streams are discharged. The standard applies to affected facilities producing one or more of the chemicals listed in 60.707 as a product, co-product, by-product, or intermediate. The regulated pollutants are VOC. This information is being collected to assure compliance with 40 CFR part 60, subpart RRR.

### NESHAP subpart BB: Benzene Emissions from Benzene Transfer Operations

The National Emission Standards for Benzene Emissions from Benzene Transfer Operations were proposed on September 14, 1989, and promulgated on March 7, 1990. The affected facility to which this subpart applies is the total of all loading racks handling a liquid containing 70 weight-percent or more benzene, at which benzene is loaded into tank trucks, railcars, or marine vessels at each benzene production facility and each bulk terminal. However, specifically exempted from this regulation are loading racks at which only the following are loaded: Benzene-laden waste (covered under subpart FF of part 61), gasoline, crude oil, natural gas liquids, petroleum distillates (i.e., fuel oil, diesel, or kerosene), or benzene-laden liquid from coke by-product recovery plants. In addition, any affected facility which loads only liquid containing less than 70 weight-percent benzene or whose annual benzene loading is less than 1.3 million liters of 70 weight-percent or more benzene is exempt from the control requirements except for the recordkeeping and reporting requirements in 61.305(i). Marine vessels were given a one year industry wide waiver of compliance, which was later extended to July 23, 1991, in order to allow for concurrent compliance with United States Coast Guard regulations. The regulated pollutant is benzene. This information is being collected to assure compliance with 40 CFR part 61, subpart BB.

### NESHAP subpart Y: Benzene Emissions from Benzene Storage Vessels

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Benzene Emissions from Storage Vessels were proposed in 1980 and re-promulgated in 1989 (54 FR 38077) as 40 CFR part 61, subpart Y. Entities affected by this action are those owners and operators of benzene storage vessels that store benzene having a specific gravity within the range of specific gravities as specified in ASTM D 4734-98 for Refined Benzene-545. Storage vessels with a design storage capacity less than 38 cubic meters (10,000 gallons) are exempt from the provisions of the subpart. Similarly, storage vessels used for storing benzene at coke by-product facilities or vessels permanently attached to motor vehicles such as trucks, rail cars, barges, or ships or pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere are also exempt from this subpart. The regulated pollutant is benzene. This information is being collected to assure compliance with 40 CFR part 61, subpart Y.

### NESHAP subpart V: National Emission Standard for Equipment Leaks (Fugitive Emission Sources)

Affected facilities include the following sources that are intended to operate in volatile hazardous air pollutant service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels, and control devices or systems. The standards for this subpart are leak detection and repair (LDAR). The regulated pollutants are volatile hazardous air pollutants. This information is being collected to assure compliance with 40 CFR part 61, subpart V.

### NESHAP subparts F, G, H and I: The HON

The Maximum Achievable Control Technology (MACT) for the Hazardous Organic NESHAP (HON) standards were proposed on December 31, 1992 and promulgated on April 22, 1994. These standards apply to chemical manufacturing process units (CMPU's) in the SOCOMI industries which manufacture as a primary product one or more of the chemicals listed in Table 1 of 40 CFR part 63, subpart F; use as a reactant or manufacture as a product, by-product, or co-product, one or more of the organic hazardous air pollutants listed in Table 2 of subpart F; and are located at a plant site that is a major source as defined in section 112(a) of the Act. Additionally, styrene-butadiene rubber production, pesticide production, polybutadiene production, chlorinated hydrocarbon use in the production of chemicals, pharmaceutical production, and miscellaneous butadiene use are subject to the negotiated regulations affecting equipment leaks promulgated under subpart I. The emission points include transfer racks, storage tanks, wastewater systems, process vents and equipment leaks. The regulations apply to existing sources as well as new sources commencing construction or reconstruction after the date of proposal. Hazardous air pollutants (HAPs) are the pollutants regulated under these subparts. This information is being collected to assure compliance with 40 CFR part 63, subparts F, G, H and I.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The Clean Air Act (CAA or Act) provides authority to the Agency to establish standards to control air pollution and to ensure compliance with promulgated regulations through adequate recordkeeping and reporting by the affected industries (i.e., respondents). The regulations include the New Source Performance Standards (NSPS) under section 111 of the Act, the National Emission Standards for Hazardous Air Pollutants ( NESHAP) which includes the original NESHAP standards and the more recent Maximum Achievable Control Technology (MACT) or NESHAP-MACT standards under section 112 of the Act, and emission guidelines for the designated types incinerators under section 129 of the Act.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard(s) are used by regulatory agencies, the public and the regulated community for a variety of reasons including the determination of the respondent's compliance status, analytical studies to demonstrate compliance trends, and evaluations regarding the efficacy of the promulgated regulations.

The required recordkeeping and reporting are also used to: 1) certify compliance with the regulations; 2) determine the respondent's compliance with the designated emission limitation(s); 3) notify regulatory agencies when a standard is violated; 4) evaluate continuous compliance through the use of emission or operational parameter monitors; and 5) ensure that plant personnel are following the required procedures and are periodically trained, as indicated.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

### **3(a) Nonduplication**

The standards do not require duplication in the collection and reporting of information. If the subject standards have not been delegated, the information is sent directly to the appropriate Environmental Protection Agency (EPA) regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards.

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

A public review and comment period will occur after proposal of the amendments to the Standards of Performance for equipment leaks of VOC in the SOCMIs (40 CFR part 60, subpart VV).

### **3(c) Consultations**

The EPA will provide a 60-day public comment period after proposal of the amendments to the standards of performance for equipment leaks of VOC in SOCMIs. All affected parties will be given the opportunity to comment on the proposed amendments during this period. The EPA will consider all of the comments received and may incorporate them in developing the final amendments.

During development of the proposed amendments, EPA held meetings and conference calls with representatives of petroleum refining companies and their trade associations (National Petroleum Refiners Association and American Petroleum Institute); however, recordkeeping and reporting requirements and related burden estimates were not discussed during these meetings. Representatives of the American Chemistry Council declined invitations to participate in development of the proposed amendments.

Interested parties were provided an opportunity to comment on the burden associated with the CAR and other referencing subparts when the CAR was being developed and in comments submitted in response to the First Federal Register Notice announcing renewal of this ICR. Since the proposed amendments to 40 CFR part 60, subpart VV do not affect the burden estimates for the CAR and other referencing subparts, no changes have been made to the burden estimates for those rules relative to the estimates in the last approved ICR for the CAR. Thus, the only consultation with industry being conducted at this time involves burden estimates for amendments to subpart VV.

### **3(d) Effects of Less Frequent Collection**

The effect of less frequent collection would be a decrease in the margin of assurance that facilities are achieving the emission reductions mandated by the CAA through the promulgation of the applicable regulations. In addition, the likelihood of detecting the poor operation and maintenance of control equipment decreases and the detection of noncompliance becomes problematic.

### **3(e) General Guidelines**

Neither the reporting nor recordkeeping requirements violate the regulations established by Office of Management and Budget (OMB) at 5 CFR part 1320, Section 1320.5. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent with the permit program at 40 CFR part 70, 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 the respondent for purposes of determining the appropriate level of enforcement action. Historically, EPA notes that the most flagrant violations have extended beyond a five-year period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting noncompliance.

### **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 (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 recordkeeping and reporting requirements do not contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The Standard Industrial Classification(SIC) codes and corresponding North American Industry Classification System (NAICS) for the respondents are listed below.

SIC Code	NAICS Code
2821	325211
2824	325222
2851	32551



SIC Code	NAICS Code
2865*	325111, 325132, 325192
2869*	32511, 325193, 325199
2899*	32511, 325199
2911	32411
2951	324121
2952	324122
2992	324191
2999	324199
4212	562111, 562112, 562119, 48411, 48421, 48422
4213	484121, 484122, 48421, 48423
4214	48411, 48421, 48422
4215	49211, 49221
4221	49313
4222	49312
4225	49311, 53113
4226	49312, 49311, 49319
4231	48849
4412	483111
4424	483113

SIC Code	NAICS Code
4432	483113
4449	483211
4481	483112, 483114
4482	483114, 483212
4489	483212, 48721
4491	48831, 48832
4492	48833
4493	71393
4499	532411, 48831, 48833, 48839
4724	56151
4725	56152
4729	488999, 561599
4731	541614, 48851
4741	532411, 48821
4783	488991
4785	48839, 48849
4789	488999, 48711, 72231, 48821

\*These SIC codes characterize respondents most likely to be subject to the proposed amendments to 40 CFR part 60, subpart VV.

This table is not meant to be exhaustive, but rather provides a guide for readers regarding the entities likely to be regulated by this standard. To determine whether the standard applies to a particular entity, please see the applicability provisions in the standard.

**4(b) Information Requested**

**(i) Data Items**

Attachment A lists the recordkeeping and reporting requirements for the CAR and the referencing subparts.

Electronic Reporting

At the present, many respondents to CAA standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 20 percent of the respondents use electronic reporting.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CPMS for the appropriate control device
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed in Attachment A
Enter information required to be recorded in Attachment A.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.

<b>Respondent Activities</b>
Develop, acquire, install, and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

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

### **5(a) Agency Activities**

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

The Agency activities associated with the CAR are presented in Table 1, and the Agency activities associated with the referencing subparts are shown in Tables F1 through F11.

### **5(b) Collection Methodology and Management**

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or thru an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the Agency or delegated authority.

The results of these evaluations are entered into the Air Facility Subsystem (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and delegated authorities can retrieve and analyze the data.

### **5(c) Small Entity Flexibility**

Minimizing the information collection burden for all sizes of organizations is a continuing effort on EPA's part. EPA has limited recordkeeping and reporting to the minimum necessary to ensure and verify compliance with the rule. The amendments to subpart VV include additional recordkeeping and reporting requirements because experience with enforcing the existing rule has shown that additional data are needed. Some of the proposed recordkeeping is

already required in other equipment leak rules. For example, other rules already require records of the dates and results of weekly visual inspections of pumps. Keeping records of information from flow indicators in bypass lines or of visual checks of bypass line valve position (and corresponding reporting of deviations) also makes subpart VV consistent with other rules. Other new requirements are unique to subpart VV, but the level of effort involved is small. Generating records of all instrument readings should add minimal burden because identification of the equipment monitored, the instrument reading, and the monitoring date generally are collected electronically for all equipment while monitoring; the only additional burden would be to download all of the data rather than just the leaker data to storage, and to make sure that the records include identification of the operator and monitoring instrument. Records (and related reporting) of leaks identified as a result of the new annual monitoring requirement for open-ended lines is needed to document compliance with the rule. The most significant additional burden would be to record information regarding instrument calibrations because this effort would apply each day when instrument monitoring is conducted. For a typical or average process, monitoring should take no more than about 6 days in months when valves must be monitored, less in other months. The recordkeeping level of effort per day, however, should be no more than a few minutes. Overall, EPA does not expect that small organic chemical manufacturing businesses will experience adverse impacts related to the cost of the reporting and recordkeeping requirements in the amendments to subpart VV.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 5 for the CAR and Tables G1 - G12 for the referencing subparts, respectively.

### **6. Estimating the Burden and Cost of the Collection**

Table 5 for the CAR, and Tables G1- G12 for the referencing subparts, document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry. 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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

#### **6(a) Estimating Respondent Burden**

The respondent burden is summarized in Table 6 and detailed in Table 5 for the CAR, and Tables G1- G12, for the referencing subparts. The labor hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the standard, 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	\$96.41	(\$45.91 + 110%)
Technical	\$82.74	(\$39.40 + 110%)
Clerical	\$42.25	(\$20.12 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2004, "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**

Because we assume that no new sources will opt to comply with the CAR at startup over the next 3 years, there are no capital costs associated with the CAR. Facilities that comply with the CAR are assumed to have already purchased any equipment needed to comply with the referencing subpart. Capital/Startup and O&M costs for the referencing subparts are summarized in Table 6. Details of the capital/startup and O&M costs, as taken from the most recently approved ICR for the CAR and referencing subparts, are detailed in Appendix J. The capital/startup and O&M costs to comply with subpart VV do not change as a result of the proposed amendments because the amendments do not affect the number of facilities that would need to purchase monitoring instruments. However, the estimated number of sources that become subject each year has decreased based on analyses performed for proposal of the amendments to subpart VV, which decreases the estimated capital/startup and O&M costs for subpart VV to \$8,400 per year.

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

The total capital/startup costs for this ICR are detailed in Appendix J and summarized in Table 6 in column F. The total operation and maintenance (O&M) costs for this ICR is the total of column E in Table 6. The sum of these costs is shown in block 11 on part II of the Paperwork Reduction Act Submission Worksheet. These costs are not split into costs associated with recordkeeping versus costs associated with reporting in block 11 because the costs were not estimated in that manner for the previously approved ICR. As noted above, these costs also do not change as a result of the proposed amendments to subpart VV.

### **6(c) Estimating Agency Burden and Costs**

The only costs to the Agency are those associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents and the publication and distribution of collected information.

The average annual Agency burden and cost during the three years of the ICR is 24,906 hours and \$1,009,700. This is calculated in Table 2 for the CAR and Attachments F1-F11 for the referencing subparts, and is summarized in Table 6. See Table F-3 for the changes resulting from the proposed amendments to subpart VV.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay.

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

Number of respondents is calculated in Table 5 for the CAR, and Attachments G1- G12 for the referencing subparts for the three years covered by this ICR and summarized in Column (B) of Table 6. This number is shown in block 10 on part II of the Paperwork Reduction Action Submission Worksheet.

The Total Hours Requested is shown in block 12 on part II of the Paperwork Reduction Act Submission Worksheet. A summary of the total annual labor cost may be found in Table 6. A detailed description of the Total Hours Requested may be found in Table 5 for the CAR, and Attachments G1- G12 for the referencing subparts. See Table G-3 for the burden related to the amendments to subpart VV.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are summarized in Table 6 and detailed in Tables 2 and 5 for the CAR, and Tables F1 - F11 and G1 - G12 for the referencing subparts, respectively.

##### **(i) Respondent Tally**

The Total Hours Requested is shown in block 12 on part II of the Paperwork Reduction Act Submission Worksheet. The annual labor cost is not shown on the Paperwork Reduction Act Submission Worksheet. Details regarding these estimates may be found in Table 5 for the CAR, and Tables F1 - F11 and G1 - G12 for the referencing subparts, respectively. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 180 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are shown in block 12 on part II of the Paperwork Reduction Act Submission Worksheet. The cost calculations are detailed in section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Cost.

## (ii) The Agency Tally

The average annual Agency burden hours and cost over next three years is 24,906 hours at a cost of \$1,009,700. This is summarized in Table 6 and detailed in Table 2 for the CAR and Tables F1 - F11 for the referencing subparts. This burden is a decrease of 3,088 hours from the most recently approved ICR. The overall decrease is a combination of an estimated increase of 0.2 hr of technical review for each semiannual emission report submitted to comply with subpart VV amendments and an estimated decrease in the number of sources subject to subpart VV.

### 6(f) Reasons for Change in Burden

There is an decrease of 57,547 burden hours from the most recently approved ICR due to adjustments. These adjustments result from proposed amendments to NSPS subpart VV (Table G3), which cause a slight increase in burden, and revised estimates of the number of sources subject to this subpart, which decrease the estimated burden. The proposed amendments require respondents to keep additional records for leaks from open-ended lines, the results of weekly inspections of pumps, indication of flow in bypass lines around any control devices, daily calibrations of the monitoring instrument, and all instrument readings. In addition, semiannual reports must include information related to leaks from open-ended lines and periods of flow through bypass lines. The adjustments to the number of sources are a result of analyses performed for proposal of these amendments. Specific changes to tables are described below:

**Table 6** - Since this is a summary table, the appropriate entries were changed according to the changes made to Tables F3 and G3.

**Table F3** - The table was updated to include an additional 0.2 hr for Agency review of a semiannual emission report per process unit (source). This increase assumes about 12 minutes to review information about open-ended lines in every other report (open-ended lines must be monitored annually). It also includes 12 minutes for every other report to review information regarding flow in bypass lines around control devices; this estimate is likely high because most facilities do not route equipment leak emissions to control devices. The table was also updated to provide a more realistic estimate for the number of existing and new sources subject to these provisions, which decreased the overall burden for this subpart.

**Table G3** - Table G3 was updated to include an additional 7 hr/occurrence to enter records of operating parameters and an additional 0.125 hr/occurrence to prepare semiannual reports. The recordkeeping burden is estimated based on 10 min/yr to record information about leaks and possibly delay of repair for open-ended lines, 2 min/wk to records the date and results of weekly visual inspections of pumps, 1 min/month to record information about inspections of valve position in bypass lines around control devices, 2 min/d for 6 d/month to record instrument calibration information, and 2 min/d for 6 d/month to record all of the instrument readings. The 6 d/month for instrument monitoring is a maximum for a typical process with about 1,600 valves and pumps; in months when valve monitoring is not required, the number of monitoring days will be less. The additional reporting burden assumes 10 min/yr to document information related



to leaking open-ended lines (i.e., every other report) and 2.5 minutes per report to document information related to bypass lines. The table was also updated to provide a more realistic estimate for the number of existing and new sources subject to these provisions, which decreased the overall burden for this subpart.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 180 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2004-0049, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Enforcement and Compliance Docket and Information Center is (202) 566-1927. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used 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. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2004-0049 and OMB Control Number 2060-0443 in any correspondence.

### **Part B of the Supporting Statement**

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

TABLE 1: AGENCY ACTIVITIES

---

---

Performance Tests

- Initial
- Repeat

Review Reports

- Notification of Initial Startup
  - Notification of Performance Test
  - Initial Compliance Status
  - Startup, Shutdown, Malfunction Plans
  - Periodic Reports
- 
-

TABLE 2: ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR THE CAR PROVISIONS

Burden Item (Reports to Review)	Average Hours per Activity (a)	Number of Activities per Year (b)	Estimated Technical Hours per Year <sup>a</sup> (c)	Estimated Managerial Hours per Year <sup>b</sup> (d)	Estimated Clerical Hours per Year <sup>c</sup> (e)	Annual Cost <sup>d</sup> (f)
1. Initial Notification of Part 65 Applicability	2	27 <sup>e</sup>	54	3	5	\$2,518
2. Review Equipment Leak Monitoring	5	636 <sup>f</sup>	3180	159	318	\$148,255
3. Review Periodic Reports	4	80 <sup>g</sup>	320	16	32	\$14,919
TOTAL ANNUAL COST			3554	178	355	\$165,692
Total Annual Burden				4087		

<sup>a</sup> c = a x b

<sup>b</sup> Estimate managerial hours are 5 percent of technical hours.

<sup>c</sup> Estimate clerical hours are 10 percent of technical hours.

<sup>d</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>e</sup> Estimate that all CAR sources must submit an Initial Notification of Part 65 Applicability. It is estimated that 1/3 of the sources will submit an initial notification in each of the three years covered by this ICR. This equates to 27 per year (80/3) during each of the three years following promulgation.

<sup>f</sup> Estimate that 318 equipment leak sources will comply with the CAR (240 from the HON, 59 from subpart VV and 19 from subpart V - see Table 4). Reports for equipment leaks will be submitted semiannually (318 x 2 = 636 per year). See Attachment C for assumptions and further description of activities.

<sup>g</sup> Estimate that 25 percent of the 320 SOCOMI facilities which equals 80 facilities will opt to comply with the CAR and must submit periodic reports each year.

TABLE 3: ESTIMATED NUMBER OF SOURCES SUBJECT TO REFERENCING SUBPARTS THAT WILL OPT TO COMPLY WITH THE CAR

Referencing Subpart (A)	Estimated Number of Sources Complying with CAR <sup>a, b</sup> (B)
Storage Vessels	
Ka	458
Kb	382
Y	0
Transfer Racks	
BB	0
Equipment Leaks	
V	19
VV	59
Process Vents	
III	1
NNN	71
RRR	8
DDD	5
HON F & G - Storage Vessels	800
HON F & G - Transfer Racks	320
HON H & I -- Equipment Leaks	240
HON F & G - Process Vents	640

<sup>a</sup> Note that the estimate is on a per-source basis, rather than on a facility basis and therefore correlates to (as described in the footnote to the appropriate Table), but does not match the facility entries in the referencing subpart burden tables in Tables F1-F11 and G1-G12. For the purpose of this information collection request, a source is defined as:

- one storage vessel (subparts Ka, Kb, Y, and G);
- one process vent (subparts DDD, III, NNN, RRR, and G);
- the collection of subject equipment for one process unit (subparts VV, V, and H & I); or
- one transfer rack (subparts BB and G).

<sup>b</sup> From the most recently approved ICR.

TABLE 4: BASIS FOR ANNUAL RESPONDENT BURDEN OF REPORTING AND RECORDKEEPING FOR THE CAR

Burden Item	Annual Burden in Technical Hours													Totald
	Process Vents		Storage Vessels		Transfer Racks		Equipment Leaks				Inventory			
	per sourceb	totalc	per sourceb	totalc	per sourceb	totalc	With Connectors		Without Connectorsa		per sourceb	totalc		
							per sourceb	totalc	per sourceb	totalc				
Read Rule and Instructions	2.9	2,103	1.1	1,804	1.1	352	2.5	600	1.0	78	1.8	144	5,081	
Plan Activities	2.1	1,523	1.7	2,788	0.85	272	0.57	137	0.23	18	4.5	360	5,097	
Training	1.3	943	0.5	820	0.5	160	0	0	0	0	0	0	1,923	
Create, Test, Research and Development	28	20,300	16	26,240	16	5,120	380	91,200	155	12,090	0	0	154,950	
Gather Information, Monitor and Inspect	14	10,150	17	27,880	17	5,440	263	63,120	108	8,424	54	4,320	119,334	

Burden Item	Annual Burden in Technical Hours													Totald
	Process Vents		Storage Vessels		Transfer Racks		Equipment Leaks				Inventory			
	per source <sup>b</sup>	total <sup>c</sup>	per source <sup>b</sup>	total <sup>c</sup>	per source <sup>b</sup>	total <sup>c</sup>	With Connectors		Without Connectors <sup>a</sup>		per source <sup>b</sup>	total <sup>c</sup>		
							per source <sup>b</sup>	total <sup>c</sup>	per source <sup>b</sup>	total <sup>c</sup>				
Compile, Process and Review Data	0	0	0	0	0	0	0	0	0	0	0	18	1,440	1,440
Complete Forms	9	6,525	5.4	8,856	5.4	1,728	57	13,680	23	1,794	5.4	432	33,015	
Record/ Disclose	28	20,300	2.8	4,592	2.8	896	4.7	1,128	1.9	148	9	720	27,784	
File/Store	3	2,175	1.25	2,050	1.25	400	2.75	660	0.9	70	1.58	126	5,482	
<b>TOTAL</b>	<b>88.3</b>	<b>64,018</b>	<b>46</b>	<b>75,030</b>	<b>45</b>	<b>14,368</b>	<b>711</b>	<b>170,525</b>	<b>290</b>	<b>22,622</b>	<b>94</b>	<b>7,542</b>	<b>354,106</b>	

<sup>a</sup> The HON, the basis for the CAR burden estimate, requires connector monitoring. Sources originally complying with subpart V or VV will not be required to perform connector monitoring if they opt to comply with the CAR. For this reason, a separate burden estimate was developed for sources that are not required to perform connector monitoring. The per-source burden for these facilities is the average of the per-source burden for subparts V and VV. The average for subparts V and VV is 294 hours, 40.9 percent less than the HON-based estimate. Per-source estimates for each burden item were estimated by multiplying the HON-based estimate by 40.9 percent.

<sup>b</sup> From most recently approved CAR ICR.

<sup>c</sup> Total burden for each source type is the product of the per-source burden and the total number of sources estimated to opt to comply with the CAR. The number of sources estimated to comply with the CAR are from the most recently approved ICR and are detailed in Table 3:

- process vents - 725
- storage vessels - 1,640
- transfer racks - 320
- equipment leaks with connector monitoring - 240
- equipment leaks without connector monitoring - 78
- facilities (used for inventory estimate) - 80

<sup>a</sup>Total burden for each burden item is the sum of totals for each source type. This burden represents technical hours only and is the basis for determining total burden in Table 5.



TABLE 5: ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE CAR

Burden Item	Average Hours per Activity (a)	Number of Activities per year per source (b)	Technical Hours per year per source (c)	Estimated Technical Hours per year (d)	Estimated Managerial Hours per year (e)	Estimated Clerical Hours per year (f)	Annual Cost (g)
Read Rule and Instructions	2.76	23	63.51	5,081	254	508	\$466,353
Plan Activities	4.90	13	63.71	5,097	255	510	\$467,858
Training	6.01	4	24.04	1,923	96	192	\$176,476
Create, Test, Research and Development	19.56	99	1936.88	154,950	7,748	15,495	\$14,222,211
Gather Information, Monitor and Inspect	2.20	677	1491.68	119,334	5,967	11,933	\$10,953,143
Compile, Process and Review Data	18.00	1	18.00	1,440	72	144	\$132,171
Complete Forms	82.54	5	412.69	33,015	1,651	3,302	\$3,030,344
Record/ Disclose	13.36	26	347.30	27,784	1,389	2,778	\$2,550,132
File/Store	1.96	35	68.53	5,482	274	548	\$503,150
TOTAL COST				354,106	17,706	35,410	\$32,501,838
TOTAL BURDEN HOURS					407,222		

Following is a brief explanation of each column. A more detailed description is provided in Attachment E.

(a) Average hours per activity are back-calculated by dividing (c) by (b)

(b) Number of activities per year is based on the estimate of number of activities per year for the HON, with a reduction to reflect the consolidation of activities achieved through the CAR.

(c) Technical hours per year per source are the total technical hours for a burden item as estimated in Table 4, divided by 80 facilities.

(d) Estimated technical hours per year are the total technical hours for all facilities for each burden item, as estimated in Table 4.

(e) Estimated managerial hours per year are assumed to be 5 percent of technical hours.  $(e) = (d) \times 0.05$ .

(f) Estimated clerical hours per year are assumed to be 10 percent of technical hours.  $(f) = (d) \times 0.10$ .

(g) Annual Cost is the sum of costs for technical, managerial, and clerical hours based on the following rates from the United States Department of Labor, Bureau of Labor Statistics, September 2004, "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.

Managerial	\$96.41	(\$45.91 + 110%)
Technical	\$82.74	(\$39.40 + 110%)
Clerical	\$42.25	(\$20.12 + 110%)

TABLE 6: SUMMARY OF RESPONDENT BURDEN AND COST FOR REFERENCING SUBPARTS AND THE CAR

Subpart	(A) Number of Respondents (Block 13a)	(B) Total Annual Responses (Block 13b) <sup>a</sup>	(C) Respondent Burden Hours (Block 13c)	(D) Respondent Burden Costs	(E) Agency Burden Hours	(F) Agency Burden Costs	(E) Total Capital and O&M (Block 14 c) in 000's <sup>b</sup>	(F) Capital Costs (Block 14a) in 000's <sup>b</sup>
NSPS Ka	174	194	46,455	\$3,707,733	115	\$4,646	0	0
NSPS Kb	580	1,976	85,489	\$6,823,252	978	\$39,636	69	27
NSPS VV	556	1,182	62,088	\$4,955,465	2,983	\$120,905	8	8
NSPS DDD	90	222	6,755	\$539,133	571	\$23,144	930	300
NSPS III	11	26	296	\$23,636	69	\$2,778	29	14
NSPS NNN	1,345	3,433	41,880	\$3,342,654	8,955	\$363,067	4,206	2,390
NSPS RRR	155	394	4,789	\$382,236	1,026	\$41,604	578	500
NESHAP BB	54	216	12,444	\$993,255	497	\$20,140	0	0
NESHAP Y	4	8	65	\$5,176	9	\$373	0	0
NESHAP V	55	123	7,529	\$600,869	289	\$11,710	0	0
NESHAP F, G, H, and I	245	1,845	1,324,711	\$72,890,428	5,327	\$216,005	67,513	138
CAR	80	400	407,222	\$32,501,838	4,087	\$165,692	22,000	0

Subpart	(A) Number of Respondents (Block 13a)	(B) Total Annual Responses (Block 13b) <sup>a</sup>	(C) Respondent Burden Hours (Block 13c)	(D) Respondent Burden Costs	(E) Agency Burden Hours	(F) Agency Burden Costs	(E) Total Capital and O&M (Block 14 c) in 000's <sup>b</sup>	(F) Capital Costs (Block 14a) in 000's <sup>b</sup>
TOTAL	3,349	10,019	1,999,723	\$126,765,675	24,906	\$1,009,700	95,333	3,377

<sup>a</sup> From Tables G1- G11

<sup>b</sup> From Appendix J

**Part 1: Recordkeeping and Reporting under the Consolidated Air Rule**

1. General Records

- The owner or operator shall keep copies of notifications, reports, and records as specified in §65.5.
- The owner or operator shall maintain a startup, shutdown, and malfunction plan as specified in §65.6.

2. Storage Vessel Records

- Storage vessel records where emissions are controlled by a fixed roof and internal floating roof (IFR), external floating roof (EFR), or EFR converted into an IFR as specified in §65.47.
- Storage vessel records where emissions are controlled by a control device as specified in §65.159 for flare compliance determination and §65.163 for closed vent systems.
- Storage vessel records where emissions are routed to a fuel gas system or process as specified in §65.163.

3. Process Vent Records

- General process vent records as specified in §§65.66, 65.63, and 65.160.
- Process vent records where emissions are controlled by a control device as specified in Section 65.159 for flare compliance determination records and §§65.162 and 65.163.
- Process vent records where recovery devices are used to maintain the TRE index value above 1.0 as specified in §65.160.

4. Transfer Rack Records

- General Transfer Rack Records as specified in §§65.83, 65.87, and 65.160.
- Transfer Rack Records where emissions are controlled by a control device (except for low-throughput transfer operations) as specified in §§65.159, 65.162, and 65.163.

- Low-throughput transfer operation records where emissions are controlled by a control device as specified in §§65.159 and 65.163.

5. Equipment Leak Records

- General equipment leak records as specified in §§65.103, 65.104, and 65.105. Specific equipment leak records where equipment leak emissions are not controlled by a control device or routed to a process or fuel gas system as specified in §§65.106, 65.109, 65.111, and 65.120.
- Equipment leak records where emissions are controlled by a control device as specified in §§65.159 and 65.163.

6. Notification of Initial Startup

- General contents as specified in §§65.5 and 65.48.
- Initial Notification of Part 65 Applicability as specified in §65.5.

7. Initial Compliance Status Report

- General contents as specified in §65.5.
- Storage vessels as specified in §§65.163 and 65.164.
- Process vents as specified in §§65.63, 65.67, 65.160, 65.164, and 65.165.
- Low-volume transfer racks as specified in §§65.164 and 65.165.
- High-volume transfer racks as specified in §§65.83, 65.164, and 65.165.
- Equipment leaks as specified in §§65.117, 65.118, 65.119, and 65.120.

8. Periodic Reports

- General contents as specified in §65.6.
- Storage vessel records where emissions are controlled by an IFR, EFR, or EFR converted into an IFR as specified in §65.48.
- Storage vessels where emissions are controlled by a control device as specified in §§65.166.
- Process vents as specified in §§65.67 and 65.166.

- Low-volume transfer racks as specified in §65.166.
- High-volume transfer racks as specified in §65.166.
- Equipment leaks as specified in §65.120.
- Closed vent systems as specified in §§65.143 and 65.166.
- Flares as specified in §65.166.

9. Other Notification and Reports

- Request for alteration of time periods or postmark as specified in §65.5.
- Startup, shutdown, and malfunction periodic report as specified in §65.6 (can be included with a periodic report).
- Written application for waiver of recordkeeping and reporting requirements as specified in §65.7.
- Written request for approval to use alternatives to the monitoring or recordkeeping provisions as specified in §65.7.
- Storage vessel refilling notification as specified in §65.48.
- Storage vessel seal gap measurement notification as specified in §65.48.
- Process vent Group 2A without a recovery device monitoring and recordkeeping and reporting plan as specified in §65.63.
- Process vent report of a process change if not included with the periodic report as specified in §65.67.
- Intent to conduct a performance test as specified in §65.67.
- Process vent report according to the plan for Group 2A process vents without a recovery device as specified in §65.67.
- Equipment leaks written request for alternative means of emission limitation as specified in §65.102.

**Part 2: Burden for NSPS Sources Not Electing to Comply with the CAR**

- Initial notifications as specified in §60.7.
- Provide notification of construction or reconstruction as specified in §60.7(a)(1).
- Provide notification of anticipated startup as specified in §60.7(a)(2).
- Provide notification of actual startup as specified in §60.7(a)(3).
- Provide notification of physical or operational change as specified in §60.7(a)(4).
- Demonstration of continuous monitoring system §60.7(a)(5).

- Performance test as specified in §60.8.
- Report on initial performance test results as specified in §60.8(a).
- Provide notification of initial performance test as specified in §60.8(d).

### **Requirements Specific to NSPS Subpart Ka**

- Information prior to construction on vapor recovery and return or disposal system including emissions data, operations design specifications and maintenance plan as specified in §60.113a(a)(2)(i-iv).
- Submit notification 30 days prior to seal gap measurement as specified in §60.113a(a)(1)(iv).
- Report within 60 days when a seal gap measurement exceeds the limits of §60.112a as specified in §60.113a(a)(1)(i)(E).
- Record gap measurements: Secondary seals every year and Primary seals every five years as specified in §60.113a (a)(1)(i)(D).
- Record whenever the liquid is changed, stored, period of storage and maximum true vapor pressure as specified in §60.115a(a).

### **Requirements Specific to NSPS Subpart Kb**

- Notification 30 days prior to re/filling vessel for (a)(1) and (a)(4) IFR inspections as specified in §60.113b(a)(5).
- Notice 30 days prior to seal gap measurements as specified in §60.113b(b)(5).
- Notification 30 days prior to re/filling vessel for (b)(6) EFR inspections as specified in §60.113b(b)(6).
- Submit operating plan for closed vent or exempt control device as specified in §60.113b(c).
- Report describing equipment and certifying control for IFR as specified in §60.115b(a)(1).
- Record of each inspection required at §60.113b(a), and 40 CFR §60.115b(a)(2).
- Report of visual defects as specified in 40 CFR §60.115b(a)(3).
- Report of seal holes/tears as specified in 40 CFR §60.115b(a)(4).
- Report describing equipment and certifying control for EFR as specified in 40 CFR §60.115b(b)(1).
- Report results of seal gap measurement required at §60.113b(b)(1) within 60 days 40 CFR §60.115b(b)(2).
- Record of each gap measurement required at §60.113b(b) 40 CFR §60.115b(b)(3).
- Report gaps exceeding limits within 30 days of inspection required by §60.113b(b)(4) - 40 CFR §60.115b(b)(4).
- Records kept on closed-vent system as specified in 40 CFR §60.115b(c).



- Report of flare measurements as specified in 40 CFR §60.115b(d)(1).
- Records kept on flare as specified in 40 CFR §60.115b(d)(2).
- Report semiannually periods of pilot flame absent from flare as specified in 40 CFR §60.115b(d)(3).
- Records of dimensions and capacity of vessel as specified in 40 CFR §60.116b(b).
- Record of VOL stored, period of storage, and maximum true vapor pressure of lower kPa vessels as specified in 40 CFR §60.116b(c).
- Record of VOL stored, period of storage, and maximum true vapor pressure of higher kPa vessels as specified in 40 CFR §60.116b(d).

### **Requirements Specific to NSPS Subpart VV**

- Recordkeeping as specified in 40 CFR §60.486.
- Semiannual reporting requirements as specified in 40 CFR §60.487(a), 40 CFR §60.487(b), 40 CFR §60.487(c).
- Notification of alternative standard selected as specified in §60.487(d).
- Report Performance tests as specified in §60.487(e).

### **Requirements Specific to NSPS Subpart DDD**

- Initial performance test results or specified alternative reports as specified in 40 CFR §60.565.
- Semiannual reports of deviations from monitoring parameters, monitoring exceedances, changes in process operations, and periods during which control device is inoperative as specified in 40 CFR §60.565(k).
- Records of periods when flow monitor indicates emission stream is being diverted away from the control device as specified in 40 CFR §60.565(b).
- Records of monitoring parameters as specified in 40 CFR §60.565(c), (d), (e), (f), (g), (h).
- Results of monitoring during performance tests, including the vent system used to vent each affected stream to the control device; evidence of compliance with incineration requirements; evidence of compliance with boiler or process heater operation, and records from flare or pilot light flame heat sensing monitoring and periods of operation when the flare or pilot flame is absent as specified in 40 CFR §60.565(a), (b), (c), (d), (e), (f).
- Changes in production capacity, feedstock type, or catalyst type or replacement, removal or addition of product recovery equipment or an air oxidation reactor as specified in 40 CFR §60.565(g).

- Evidence of compliance with elected alternative provisions, and all periods of operation during which the performance boundaries are exceeded as specified in 40 CFR §60.565(h).

### **Requirements Specific to NSPS Subpart III**

- Notification of the specific provisions of the standards which the owner has elected to comply as specified in 40 CFR §60.615(a).
- Record data measured during each performance test as specified in 40 CFR §60.615(b) and 40 CFR §60.615(h)(3).
- Continuously record equipment operating parameters as specified in 40 CFR §60.615(c) and 40 CFR §60.615(g).
- Record periods of operation during which the performance boundaries established during the most recent performance test are exceeded as specified in 40 CFR §60.615(c) and 40 CFR §60.615(g).
- Continuously record the indication of vent stream flow to the control device as specified in 40 CFR §60.615(d).
- Record all periods of operation of a boiler or process heater as specified in 40 CFR §60.615(e).
- Record results of flare pilot flame monitoring and all periods of operations in which the pilot flame is absent as specified in 40 CFR §60.615(f).
- Record changes in production capacity, feedstock type, catalyst type, or replacement, removal or addition of recovery equipment or an air oxidation reactor as specified in 40 CFR §60.615(h)(1).
- Record any recalculation of the TRE index value as specified in 40 CFR §60.615(h)(2).
- Written report of initial performance test results as specified in 40 CFR §60.8 and 40 CFR §60.615(b).
- For the semiannual report exceedances of parameter boundaries established during the most recent performance test as specified in 40 CFR §60.615(j)(1).
- For the semiannual report all periods when the vent stream is diverted from the control device or has no flowrate as specified in 40 CFR §60.615(j)(2).
- For the semiannual report all periods when the boiler or process heater was not operated as specified in 40 CFR §60.615(j)(3).
- For the semiannual report all periods in which the flare pilot flame was absent as specified in 40 CFR §60.615(j)(4).
- For the semiannual report any recalculation of the TRE index value as specified in 40 CFR §60.615(j)(5).

### **Requirements Specific to NSPS Subpart NNN**

- Notification of the specific provisions of the standards which the owner has elected to comply as specified in 40 CFR §60.665(a).
- Record data measured during each performance test as specified in 40 CFR §60.665(b) and 40 CFR §60.665(h)(3).
- Continuously record equipment operating parameters as specified in 40 CFR §60.665 and 40 CFR §60.665(g).
- Record periods of operation during which the performance boundaries established during the most recent performance test are exceeded as specified in 40 CFR §60.665 and 40 CFR §60.665(g).
- Continuously record the indication of vent stream flow to the control device as specified in 40 CFR §60.665(d).
- Record all periods of operation of a boiler or process heater as specified in 40 CFR §60.665(e).
- Record results of flare pilot flame monitoring and all periods of operations in which the pilot flame is absent as specified in 40 CFR §60.665(f).
- Record changes in production capacity, feedstock type, catalyst type, or replacement, removal or addition of recovery equipment or an air oxidation reactor as specified in 40 CFR §60.665(h)(1).
- Record any recalculation of the TRE index value as specified in 40 CFR §60.665(h)(2).
- Record data showing that the vent stream flowrate is less than 0.008 m<sup>3</sup>/min and any change in equipment or process operation that increases the operating vent stream flowrate including a measurement of the new flowrate as specified in 40 CFR §60.665(i).
- Record any change in equipment or process operation that increases the design production capacity of the process unit as specified in 40 CFR §60.665(j).
- Written report of performance test results as specified in 40 CFR §60.8 and 40 CFR §60.665(b).
- For demonstrating compliance with the low capacity exemption levels, a report detailing the design production capacity of the process unit as specified in 40 CFR §60.665(n).
- For demonstrating compliance with the low flow exemption level, a report of the flowrate measurement as specified in 40 CFR §60.665(o).
- For the semiannual report exceedances of parameter boundaries established during the most recent performance test as specified in 40 CFR §60.665(l)(1).
- For the semiannual report all periods when the vent stream is diverted from the control device or has no flowrate as specified in 40 CFR §60.665(l)(2).
- For the semiannual report all periods when the boiler or process heater was not operated as specified in 40 CFR §60.665(l)(3).

- For the semiannual report all periods in which the flare pilot flame was absent as specified in 40 CFR §60.615(j)(4).
- For the semiannual report any change in equipment or process operation that increases the operating vent stream flowrate above the low flow exemption level as specified in 40 CFR §60.665(1)(5).
- For the semiannual report any change in equipment or process operation that increases the design production capacity above the low capacity exemption level as specified in 40 CFR §60.665(1)(6).
- For the semiannual report any recalculation of the TRE index value as specified in 40 CFR §60.665(1)(7).

### **Requirements Specific to NSPS Subpart RRR**

- Notification of the specific provisions of the standards which the owner has elected to comply as specified in 40 CFR §60.705(a).
- Exceedances of parameter boundaries established during the most recent performance test as specified in 40 CFR §60.705(1)(1).
- All periods when the vent stream is diverted from the control device or has no flowrate as specified in 40 CFR §60.705(1)(2).
- All periods in which the flare pilot flame was absent as specified in 40 CFR §60.705(1)(3).
- For the Semiannual Report, any changes in equipment or process operation that increases the operating vent stream flowrate above the low flow exemption level as specified in 40 CFR §60.705(1)(4).
- For the Semiannual Report, any change in equipment or process operation, that increases the design production capacity above the low capacity exemption level as specified in 40 CFR §60.705(1)(5).
- For the Semiannual Report, any recalculation of the TRE index value as specified in 40 CFR §60.705(1)(6).
- For the Semiannual Report, all periods recorded in which the seal mechanism is broken or the bypass line valve position has changed. A record of the serial number of the car-seal or a record to show that the key to unlock the bypass line valve was checked out must be maintained to demonstrate the period, the duration, and frequency in which the bypass line was operated as specified in 40 CFR §60.705(1)(7).
- For the Semiannual Report, any change in equipment or process operation that increases the vent stream concentration above the low concentration exemption level, including a measurement of the new vent stream concentration as specified in 40 CFR §60.705(1)(8).
- For the Initial Report, written report of performance test results as specified in 40 CFR §60.8 and 40 CFR §60.705(b).

- Record data measured during each performance test as specified in 40 CFR §60.705(b) and 40 CFR §60.705(g) (3).
- Continuously record equipment operating parameters as specified in 40 CFR §60.705(c).
- Records of diversion of vent stream from the control device as specified in 40 CFR §60.705(d)(1).
- Record results of flare pilot flame monitoring and all periods of operations in which the pilot flame is absent as specified in 40 CFR §60.705(e).
- Record periods of operation during which the performance boundaries established during the most recent performance test are exceeded as specified in 40 CFR §60.705(f).
- Record changes in production capacity, feedstock type, catalyst type, or replacement, removal or addition of recovery equipment as specified in 40 CFR §60.705(g)(1).
- Record any recalculation of the TRE index value as specified in 40 CFR §60.705(g)(2).
- Records to indicate that the vent stream flowrate is less than 0.011 scm/min and of any change in equipment or process operation that increases the operating vent stream flowrate, including measurement of the new vent stream flowrate as specified in 40 CFR §60.705(h).
- Each owner or operator of an affected facility that seeks to comply with the requirements of this subpart by complying with the design production capacity provision, shall keep up-to-date, readily accessible records of any change in equipment or process operation that increases the design production capacity of the process unit in which the affected facility is located as specified in 40 CFR §60.705(i).
- Each owner or operator of an affected facility that seeks to complying with the low concentration exemption, shall keep up-to-date, readily accessible records of any change in equipment or process operation that increases the concentration of the vent stream of the affected facility as specified in 40 CFR §60.705(j).

**Part 3: Burden for 40 CFR Part 61 NESHAP Sources Not Electing to Comply with the CAR**

- Construction or modification application as specified in 40 CFR §61.07.
- Provide notification of anticipated startup as specified in 40 CFR §61.09(a)(1).
- Provide notification of actual startup as specified in 40 CFR §61.09(a)(2).
- Source status report as specified in 40 CFR §61.10(a).
- Initial performance test as specified in 40 CFR §61.13.

- Provide notification of initial performance test as specified in 40 CFR §61.13.
- Report on initial performance test results as specified in 40 CFR §61.13(f).
- Provide notification of physical or operational change as specified in 40 CFR §61.15 .

#### **Requirements Specific to NESHAP Subpart V**

- Application for alternative means of emissions limitation as specified in 40 CFR §61.244.
- Recordkeeping as specified in 40 CFR §61.246.
- Reporting as specified in 40 CFR §61.247.

#### **Requirements Specific to NESHAP Subpart Y**

- Initial source report as specified in 40 CFR §61.274.
- Report of annual and periodic inspections for IFR as specified in 40 CFR §61.275(a).
- Supplemental annual period k report for IFR as specified in 40 CFR §61.275(a).
- Report of 5 or 10 year internal inspections for IFR as specified in 40 CFR §61.275(b).
- Report of annual seal gap measurements for EFR as specified in 40 CFR §61.275(d).
- Report of 5 year seal gap measurements for EFR as specified in 40 CFR §61.275(d).
- Report of excess emissions for closed vent systems with control devices as specified in 40 CFR §61.275(e).
- Record of storage vessel design capacity as specified in 40 CFR §61.276(b).
- Record of information on closed vent systems with control devices as specified in 40 CFR §61.276(c).

#### **Requirements Specific to NESHAP Subpart BB**

- Obtain vapor tightness documentation at 40 CFR §61.305(h) every 12 months as specified in 40 CFR §61.302(d).
- Maintain vapor-tightness file on each affected facility as specified in 40 CFR 40 CFR §61.302(d) and (e).
- Record of measurements during each performance test as specified in 40 CFR §61.305(a).
- Engineering report as specified in 40 CFR §61.305(a)(5).
- Record of monitoring equipment parameters and excess emissions as specified in 40 CFR §61.305(b).

- Record vent valves status and maintain for at least two years as specified in 40 CFR §61.305(c).
- Records of periods of operation of steam generator or process heater kept up-to-date as specified in 40 CFR §61.305(d).
- Records of flare operation and monitoring kept up-to-date as specified in 40 CFR §61.305(e).
- Quarterly report by sources subject to as specified in 40 CFR §61.302, and controls as specified in 40 CFR §61.305(f).
- Documentation of vapor-tightness required under 40 CFR §61.302(d) and (e) on permanent file 40 CFR §61.305(g).
- Documentation of vapor-tightness renewed at least once per year as specified in 40 CFR §61.305(h).
- Record and report information when exempt under 40 CFR §61.300(b) 40 CFR §61.305(i).
- Record of closed-vent system annual leak inspection required at 40 CFR §61.242-ll(f)(2) through 40 CFR §61.302(k), 40 CFR §61.246(d).

**Part 4: Burden for 40 CFR Part 63 NESHAP Sources Not Electing to Comply with the CAR (MACT Subparts F, G, H and I: The HON)**

Notifications:

- Notification of construction or reconstruction as specified in 40 CFR §63.5, 40 CFR §63.9, 40 CFR §63.100, 40 CFR §63.151, 40 CFR §63.182, 40 CFR §63.192.
- Notification of anticipated date of initial startup as specified in 40 CFR §63.5, 40 CFR §63.9, 40 CFR §63.151, 40 CFR §63.182, 40 CFR §63.192.
- Notification of actual date of initial startup as specified in 40 CFR §63.9, 40 CFR §63.151, §63.182, §63.192.
- Notification of process changes 40 CFR §63.100, 40 CFR §63.118, 40 CFR §63.146, 40 CFR §63.151, 40 CFR §63.152, 40 CFR §63.182, 40 CFR §63.192.
- Notification of performance test as specified in 40 CFR §63.103.
- Notification for storage tanks as specified in 40 CFR §63.192.

Reporting - Initial and Notification of Compliance Status:

- Initial report requirements as specified in 40 CFR §63.117, 40 CFR §63.122, 40 CFR §63.129, 40 CFR §63.146, 40 CFR §63.151, 40 CFR §63.182, 40 CFR §63.192.

- Reporting of operating parameter levels as specified in 40 CFR §63.117, 40 CFR §63.120, 40 CFR §63.122, 40 CFR §63.129, 40 CFR §63.130, 40 CFR §63.146, 40 CFR §63.151, 40 CFR §63.182, 40 CFR §63.192.
- Statement of compliance/noncompliance as specified in 40 CFR §63.117, 40 CFR §63.120, 40 CFR §63.122, 40 CFR §63.127, 40 CFR §63.128, 40 CFR §63.129, 40 CFR §63.151, 40 CFR §63.152, 40 CFR §63.182, 40 CFR §63.192.

Reporting - Periodic and Event Triggered:

- Startup, shutdown and malfunction as specified in 40 CFR §63.6, 40 CFR §63.10, 40 CFR §63.103, 40 CFR §63.105.
- Exceedance of parameter boundaries established during the most recent performance test as specified in 40 CFR §63.118, 40 CFR §63.122, 40 CFR §63.130, 40 CFR §63.146, 40 CFR §63.148, 40 CFR §63.151, 40 CFR §63.152, 40 CFR §63.182, 40 CFR §63.192.
- Any change in equipment or process operation that increases emission levels above requirements in the standard as specified in §63.103, §63.104, §63.122, §63.130, §63.146, §63.148, §63.151, §63.152, §63.182, §63.192.
- Written report of performance tests as specified in 40 CFR §63.117, 40 CFR §63.120, 40 CFR §63.122, 40 CFR §63.129, 40 CFR §63.146, 40 CFR §63.151, 40 CFR §63.152, 40 CFR §63.182, 40 CFR §63.192.
- Delay of repair as specified in 40 CFR §63.104, 40 CFR §63.122, 40 CFR §63.182, 40 CFR §63.192.

Recordkeeping:

- General Recordkeeping as specified in 40 CFR §63.103.
- Record of data measured during each performance test as specified in 40 CFR §63.117, 40 CFR §63.118, 40 CFR §63.123, 40 CFR §63.129, 40 CFR §63.130, 40 CFR §63.147, 40 CFR §63.148, 40 CFR §63.151, 40 CFR §63.152, 40 CFR §63.181, 40 CFR §63.192.
- Record of periods of operation during which the performance boundaries established in the Notification of Compliance Status are exceeded as specified in 40 CFR §63.118, 40 CFR §63.120, 40 CFR §63.123, 40 CFR §63.130, 40 CFR §63.147, 40 CFR §63.148, 40 CFR §63.151, 40 CFR §63.152.
- Records of Monthly visual inspections as specified in 40 CFR §63.118, 40 CFR §63.130, 40 CFR §63.147, 40 CFR §63.148, 40 CFR §63.181, 40 CFR §63.192.
- Records of Annual visual inspections as specified in 40 CFR §63.123, 40 CFR §63.147, 40 CFR §63.148, 40 CFR §63.181 40 CFR §63.192.
- TRE records for process vents as specified in 40 CFR §63.117.



- Monitoring records as specified in 40 CFR §63.118, 40 CFR §63.123.
- Records of process changes for process vents as specified in 40 CFR §63.118.
- Records of delay of repair as specified in 40 CFR §63.120, 40 CFR §63.123.
- Record of storage vessel size as specified in 40 CFR §63.123.
- Record of vent system configuration for transfer racks as specified in 40 CFR §63.129.
- Record of design criteria for equipment leaks as specified in 40 CFR §63.118.
- Record of startup, shutdown and malfunction as specified in 40 CFR §63.6, 40 CFR §63.103, 40 CFR §63.105, 40 CFR §63.152.
- Records of continuous monitoring systems as specified in 40 CFR §63.103.

Purposely left blank.

**Assumptions and Item Descriptions for Table 3**

**Assumptions are the same as Attachment E, and:**

(A) That there are 318 total sources (240 from the HON, 59 from Subpart VV, and 19 from Subpart V) that must submit semiannual reports from equipment leak detection and repair programs as well as semiannual periodic reports. This equates to 636 EPA activities (318 \* 2) during each of the three years following promulgation.

(B) That all sources must submit an Initial Notification of Part 65 Applicability or submit the corresponding information in a modification to their Title V permits. This equates to 80 EPA activities, or 27 per year (80/3) during each of the three years following promulgation.

**Item descriptions:**

(a) Average Hours per Activity are estimates of the specific activities and are the basis for estimating the overall burden.

(b) Number of Activities per Year represents the number of reports expected to be reviewed and other related activities during the course of the year, based upon assumptions (A) and (B).

(c) Estimated Technical Hours per Year is the product of (a) and (b).

(d) Estimated Managerial Hours per Year is 5 percent of (c).

(e) Estimated Clerical Hours per Year is 10 percent of (c).

(f) Estimated Annual Cost in \$ Thousands per Year is the total cost of technical, managerial, and clerical hours and overhead using this formula:

$$\frac{(H_t * \$41.57/\text{hour}) + (H_m * \$56.02/\text{hour}) + (H_c * \$14.06/\text{hour})}{1,000} = (h)$$

Where:

Ht is (c), or technical hours,  
Hm is (d), or managerial hours, and  
Hc is (e), or clerical hours.

Source:

Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

1) Initial Notification of Part 65 Applicability/Title V Modification represents the EPA review of either the Initial Notification of Part 65 Applicability report or the source’s Title V modification through which the source notifies EPA that it intends to comply with the CAR. As noted in the supporting statement text, the EPA does not expect any new sources to elect to comply with the CAR during the 3-year period following promulgation.

2) Review Equipment Leak Monitoring represents the review and screening of periodic reports received as a result of the equipment leaks standard.

3) Review Periodic Reports represents the EPA review of periodic reports from new and existing sources.

TOTAL BURDEN AND COST is the total for each of the columns (c), (d), (e), and (f).

Purposely left blank.

**Assumptions and Item Descriptions for Table 6**

**Assumptions are:**

(A) That there are 320 existing facilities of which, 25 percent (80) chose to comply with the CAR.

(B) That the average representative source will consist of a variety of sources. The total number of sources expected to comply with the CAR includes (From Table 4):

- 1,640 storage vessel;
  - 320 transfer racks;
  - 240 collections of subject equipment, including connectors;
  - 78 collections of subject equipment not including connectors;
- 80 facility wide inventories of emission points; and
  - 725 process vents.

(C) That there are 5 percent (0.05) managerial and 10 percent (0.10) clerical hours required for every technical hour.

(D) That some activities necessary to generate reports involve creating records in the process, and that these activities are assumed to be reports activities alone, to avoid double counting these as records activities as well. Therefore, only items 8 and 9 are considered records burdens directly.

**Item descriptions:**

(a) Average Hours per Activity is back-calculated by dividing (b) into (c). Since the activities within each burden category can vary significantly, it is too inaccurate to assume an average to use to calculate (c). Estimated activity technical hours are calculated in Table 5 and entered into column (c), (a) is then back-calculated with an estimated (b).

(b) Estimated Number of Activities per Year per Source represents the assumed typical number of separate activities a source may encounter during one year. This number may vary from facility to facility depending on consolidation of activities, co-located readings, etc. Since so much variability exists, it is important to note that this an estimate. This number was only used

to back calculate (a). The numbers are based on the number of activities per year estimated for complying with the HON. The numbers have been reduced to reflect the consolidation of activities achieved through the CAR.

(c) Technical Hours per Year per Source is the total technical hours for a burden item, as estimated in Table 7 divided by 80 facilities. Because of the variability in the number and combination of sources at a facility, this value could vary widely.

(d) Estimated Technical Hours per Year is the sum of total technical hours for all sources for each burden item, as estimated in Table 7.

(e) Estimated Managerial Hours per Year is 5 percent of (d).

(f) Estimated Clerical Hours per Year is 10 percent of (d).

(g) Estimated Annual Cost in Thousands of Dollars per Year is the total cost of technical, managerial, and clerical hours and overhead using this formula:

$$\underline{(H_t * \$82.74/\text{hour}) + (H_m * \$96.41/\text{hour}) + (H_c * \$42.25/\text{hour}) = (g)}$$

Where:

H<sub>t</sub> is (d), or technical hours,

H<sub>m</sub> is (e), or managerial hours, and

H<sub>c</sub> is (f), or clerical hours.

Source:

United States Department of Labor, Bureau of Labor Statistics, September 2004, "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.

1) Read Rule and Instructions consists of the activities, less training, which involve comprehending the provisions in the standard and understanding how they apply to the respective points at a facility.

2) Plan Activities represents such burdens as design, redesign, and scheduling as well as selecting methods of compliance.

- 3) Training represents the portion of activities from 1) Read Rule and Instructions for which an average facility would elect to provide class room instruction. The standard does not require specific training itself.
- 4) Create, Test, Research and Development are the activities involving testing, retesting, establishing operating ranges for parameters, and analyzing point by point applicability. Monitor related refit, calibration, and maintenance activities are also included under this heading.
- 5) Gather Information, Monitor, and Inspect are the activities involving physical inspections of equipment, collection of monitored data, and other related activities.
- 6) Process/Compile and Review are the activities that involve analysis of the information collected for accuracy and compliance as well as appropriate records and reports required as a result.
- 7) Complete Reports represents the activities normally associated with filling out forms. Since the standard requires no standard forms, these activities relate to the preparing of formal reports and cover letters.
- 8) Record/Disclose are solely recordkeeping activities which occur once the appropriate report information has been extracted; see assumption (D). These activities involve software translation, duplication, or archival processes normally associated with data management and storage common to this industry.
- 9) Store/File are activities which are solely recordkeeping which occur once the appropriate report information has been extracted; see assumption (D). These activities involve the management life cycle of records, from the time they are filed and boxed up to the time they are disposed.

TOTAL BURDEN AND COST is the total for each of the columns (d), (e), (f), and (g).



ATTACHMENT F: EPA BURDEN AND COST FOR REFERENCING SUBPARTS  
 TABLE F.1: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT  
 FOR SUBPART Ka<sup>a</sup>

Activity	(A) EPA/hr Occurrence	(B) Occurrences/ plant/yr	(C =AxB) EPA hr/ plant/yr	(D) Plants/ year	(E=CxD) Technical hr/yr	(F=Ex0.05) Managerial Hr/yr	(G=Ex0.10) Clerical Hr/Yr	(H) Total Cost per year <sup>e</sup>
Report Review: New Plant								
Vapor recovery <sup>b</sup>	N/A							
Report Review: Existing Plant								
Notification of Reconstruction	2	1	2	0	0	0	0	\$0
Notification of Modification	2	1	2	0	0	0	0	\$0
Notification of seal gap measurement <sup>c</sup>	0.5	1	0.5	188	94	5	9	\$4,389
Report of gap excesses <sup>c,d</sup>	1	1	1	6	6	0	1	\$257
TOTAL ANNUAL HOURS					100	5	10	
TOTAL ANNUAL BURDEN						115		\$4,646

<sup>a</sup> Assume no new sources subject to this regulation. All similar new sources will be subject to Subpart Kb.

<sup>b</sup> Required only at start of construction. Any new storage vessel being constructed would be subject to the NSPS Subpart Kb.

<sup>c</sup> Assume that 90 percent of the storage vessels will use a floating roof and be subject to seal gap measurement. The remaining 10 percent will use a closed vent system.

<sup>d</sup> Assume 25 percent of respondents using a floating roof will have excessive seal gaps requiring that a single report be filed once per year.

<sup>e</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

TABLE F.2: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART Kb

Reporting and Recordkeeping Requirements Assumptions <sup>a</sup>	(A) Technical Hours	(B=A*.05) Managerial Hours	(C=A*.10) Clerical Hours	Cost/year \$ <sup>a</sup>
1) Review notification of construction. 37 <sup>b</sup> new notifications at 2 hours each	74	4	7	\$3,458
2) Review notice of anticipated startup. 37 new notifications at 1 hour each	37	2	4	\$1,740
3) Review notice of actual startup. 37 new notifications at 1 hour each	37	2	4	\$1,740
4) Review notification of initial inspection @1 hr. each	37	2	4	\$1,740
5) Review of IFR Failure Report <sup>c</sup> ; 55 sources @ 1 hr/ea	55	3	6	\$2,589
6) Review Notification of Delay for Repair/Emptying IFR <sup>d</sup> ; 6 sources@ 1.2 hr/ea	7	0	1	\$313
7) Review Notification to Re-Fill <sup>d</sup> ; 602 sources@ 1 hr/ea	602	30	60	\$28,056

TOTAL ANNUAL HOURS	849	43	86	
TOTAL ANNUAL BURDEN			978	\$39,636

<sup>a</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>b</sup> Assume 111 new storage tanks will be constructed during each of the next three years, or 37 tanks per year (28 IFR’s, 7 EFR’s, 2 CVS).

<sup>c</sup> One percent failure rate for the 5468 IFRs choosing annual visual inspections equals approximately 55.

<sup>d</sup> From Table G.2

TABLE F.3: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART VV

Activity	(A) EPA/hr Occurrence	(B) Occurrences/ plant/yr	(C) Plants/ year	(D) <sup>a</sup> Technical hr/yr	(E=F*.05) Managerial hrs/yr	(G=F*.10) Clerical hrs/yr	Cost/yr <sup>e</sup>
Report Review							
New Plant							
Notification of Construction	8	1	<u>10<sup>b</sup></u>	<u>80</u>	<u>4</u>	<u>8</u>	<u>\$3,730</u>
Notification of Reconstruction/Modification	2	1	<u>6</u>	<u>12</u>	<u>1</u>	<u>1</u>	<u>\$577</u>
Notification of Actual Startup	0.5	1	<u>16</u>	<u>8</u>	<u>0</u>	<u>1</u>	<u>\$355</u>
Notification of Initial/Repeat Test	0.5	1	<u>19<sup>c</sup></u>	<u>10</u>	<u>0</u>	<u>1</u>	<u>\$417</u>
Review Test Results	2	1	<u>19<sup>c</sup></u>	<u>38</u>	<u>2</u>	<u>4</u>	<u>\$1,782</u>
Existing Plants Semiannual Emission Reports <sup>e</sup>	2.2	2	<u>556<sup>d</sup></u>	<u>2,446</u>	<u>122</u>	<u>245</u>	<u>\$114,044</u>
TOTAL ANNUAL HOURS				<u>2,594</u>	<u>130</u>	<u>259</u>	
TOTAL ANNUAL BURDEN						<u>2,983</u>	<u>\$120,905</u>

<sup>a</sup> D=AxBxC

<sup>b</sup> Estimate that there are 16 new affected sources each year over the next three years (10 new affected sources will be due to construction and 6 will be reconstructed or modified).

<sup>c</sup> Assume 20 percent of performance tests are repeated due to failure

<sup>d</sup> There are an average of 556 sources over each of the next three years. These sources do not include those subject to both Subpart VV and the HON, which are assumed to be complying with the HON.

<sup>e</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

TABLE F.4: ANNUAL AVERAGE EPA RESOURCE REQUIREMENT FOR SUBPART DDD

Activity	(A) EPA hr/ Occurrence	(B) Occurrences plant/yr	(C) plants/year	(D) <sup>a</sup> Technical hrs/yr	(E=D*.05) Managerial hrs/hr	(F=E*.10) Clerical hrs/yr	(G) <sup>b</sup> Cost/yr (\$)
<u>Report Review</u> Notification of Construction/ Reconstruction/Modification	2	1	10	20	1	2	\$932
Notification of Actual Startup	2	1	10	20	1	2	\$932
Initial Performance Test	8	1	10	80	4	8	\$3,730
Repeat Performance Test <sup>d</sup>	8	0.2	10	16	1	2	\$766
Semiannual Reports	2	2	90 <sup>c</sup>	360	18	36	\$16,784
TOTAL ANNUAL HOURS				496	25	50	
TOTAL ANNUAL BURDEN						571	\$23,144

<sup>a</sup> D=AXBXC

<sup>b</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>c</sup> Average number of affected sources over next three years.

<sup>d</sup> Assume 20 percent of performance tests repeated due to failure



TABLE F.5: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART III

Activity	(A) EPA hr/ Occurrence	(B) Occurrences/ plant/yr	(C) Plants/yr	(D) <sup>a</sup> Technical hr/yr	(E=D*.05) Managerial hrs/hr	(F=E*.10) Clerical hrs/yr	(G) <sup>b</sup> Cost/yr (\$)
<u>Report Review</u> New Plant - Notification of Construction/Reconstruction/Modification	2	1	1	2	0.1	0.20	\$93
Notification of Anticipated Startup	2	1	1	2	0.1	0.20	\$93
Notification of Actual Startup	2	1	1	2	0.1	0.20	\$93
Initial Test	8	1	1	8	0.4	0.80	\$373
Repeat Performance Test <sup>c</sup>	8	0.2	1	1.6	0.08	0.16	\$75
Semiannual Reports	2	2	11 <sup>d</sup>	44	2.2	4.40	\$2,051
TOTAL ANNUAL HOURS				59.6	2.98	5.96	
TOTAL ANNUAL BURDEN						69	\$2,778

<sup>a</sup> D=AxBxC

<sup>b</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>c</sup> Assume 20 percent of performance tests are repeated due to failure

<sup>d</sup> Average number of affected sources over next three years. Does not include sources subject to both Subpart III and the HON, which are assumed to be complying with the HON.

TABLE F.6: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART NNN

Activity	(A) EPA hr/ Occurrence	(B) Occurrences/ plant/yr	(C) Plants/yr	(D) <sup>a</sup> Technical hr/yr	(E=D*.05) Managerial hrs/hr	(F= E*.10) Clerical hrs/yr	(G) <sup>b</sup> Cost/yr (\$)
<u>Report Review</u> New Plant - Notification of Construction/Reconstruction/Modification	2	1	177	354	18	35	\$16,512
Notification of Actual Startup	2	1	177	354	18	35	\$16,512
Initial Test	8	1	177	1416	71	142	\$66,036
Repeat Performance Test <sup>c</sup>	8	0.2	177	283	14	28	\$13,187
Semiannual Reports	2	2	1345 <sup>d</sup>	5380	269	538	\$250,821
TOTAL ANNUAL HOURS				7787	390	778	
TOTAL ANNUAL BURDEN						8955	\$363,067

<sup>a</sup>  $D=AxBxC$

<sup>b</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>c</sup> Assume 20 percent of performance tests are repeated due to failure

<sup>d</sup> Average number of affected sources over next three years. Does not include sources subject to both Subpart NNN and the HON, which are assumed to be complying with the HON.

TABLE F.7: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART RRR

Activity	(A) EPA hr/ Occurrence	(B) Occurrences/ plant/yr	(C) Plants/ year	(D) <sup>a</sup> Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=E*.10) Clerical hr/yr	(G) Cost/yr \$ <sup>b</sup>
<u>Report Review</u> New Plant - Notification of Construction/Reconstruction/ Modification	2	1	20	40	2	4	\$1,865
Notification of Actual Startup	2	1	20	40	2	4	\$1,865
Initial Test	8	1	20	160	8	16	\$7,459
Repeat Performance Test <sup>c</sup>	8	0.2	20	32	2	3	\$1,510
Semiannual Reports	2	2	155 <sup>d</sup>	620	31	62	\$28,905
TOTAL ANNUAL HOURS				892	45	89	
TOTAL ANNUAL BURDEN						1026	\$41,604

<sup>a</sup> D=AxBXC

<sup>b</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>c</sup> Assume 20 percent of performance tests are repeated due to failure.

<sup>d</sup> Average number of affected sources over next three years. Does not include sources subject to both Subpart NNN and the HON, which are assumed to be complying with the HON.

TABLE F.8: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART BB

Activity	(A) EPA/hr Occurrence	(B) Occurrences/ plant/yr	(C) <sup>b</sup> Plants/year	(D) Technical hrs/yr <sup>a</sup>	(E=D*.05) <sup>c</sup> Managerial hr/yr	(F=D*.1) Clerical hr/yr	(G) Cost/yr \$ <sup>d</sup>
Report Review New Plant <sup>c</sup>							
Notification of construction	0.5	0	0	0	0	0	\$0
Notification of anticipated startup	0.5	0	0	0	0	0	\$0
Notification of actual startup	0.5		0	0	0	0	\$0
Initial report	8	0	0	0	0	0	\$0
Notification of emission test	0.5	0	0	0	0	0	\$0
Result of emission test	4	0	0	0	0	0	\$0
Notification of performance test	0.5	0	0	0	0	0	\$0

Result of performance test	8	0	0	0	0	0	\$0
Review test results	8	0	0	0	0	0	\$0
Report Review Existing Plant							
Quarterly reports	2	4	54	432	22	43	\$20,140
TOTAL ANNUAL HOURS				432	22	43	
TOTAL ANNUAL BURDEN						497	\$20,140

<sup>a</sup> AxBxC=D

<sup>b</sup> Assume an estimated total of 81 facilities. Assume 2/3 (54) facilities are marine vessel loading facilities and must continue to comply with this Subpart; assume 2 of these 54 marine vessel loading facilities also load tank trucks and railcars that are not subject to the HON.

<sup>c</sup> Assume no new sources.

<sup>d</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

TABLE F.9: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART Y

Activity	(A) EPA/hr Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/yr	(D) Technical hr/yr <sup>b</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr \$ <sup>c</sup>
Report Review							
New Sources Notification of construction	Included in NSPS Kb						
Notification of anticipated startup	Included in NSPS Kb						
Notification of actual startup	Included in NSPS Kb						
Notification of performance test	N/A	N/A	N/A	N/A	N/A	N/A	
Report of performance test	N/A	N/A	N/A	N/A	N/A	N/A	
Notification of control installation and refill at 1st degassing <sup>d</sup>	1	1	0	0	0	0	\$0
Existing Plant Annual IFR internal inspections and EFR seal gap measurements	2	1	4	8	0	1	\$373
Supplemental delay report <sup>e</sup>	1	1	0	0	0	0	\$0



Quarterly emission reports <sup>f</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL ANNUAL HOURS				8	0.4	0.8	
TOTAL ANNUAL BURDEN						9	\$373

<sup>a</sup> Estimate that there are 4 existing sources not covered by the HON. All new source burden is included in the NSPS Subpart Kb regulation for storage vessels at 40 CFR Part 60.

<sup>b</sup> D=AxBxC

<sup>c</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

<sup>d</sup> It is believed that all vessels have been degassed and all controls have been installed as they were to have been installed within 10 years of promulgation (1999)

<sup>e</sup> Estimate that two percent of existing sources will request delay of repair in the annual report.

<sup>f</sup> Assume that no source will select the fixed roof vented to a control device option and thus have no quarterly report of excess emissions.

TABLE F.10: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPART V

Activity	(A) EPA hr/ Occurrence	(B) Occurrences/ plant/yr	(C) Plants/year <sup>b</sup>	(D) <sup>a</sup> Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=E*.10) Clerical hr/yr	(G) Cost/yr \$ <sup>d</sup>
<u>Report Review</u> New Plant - Notification of Construction/Reconstruction/ Modification	2	1	2	4	0.20	0.40	\$186
Notification of Anticipated Startup	2	1	2	4	0.20	0.40	\$186
Notification of Actual Startup	2	1	2	4	0.20	0.40	\$186
Initial Test	8	1	2	16	0.80	1.60	\$746
Repeat Performance Test <sup>c</sup>	8	0.2	2	3	0.16	0.32	\$149
Semiannual Reports	2	2	55	220	11.00	22.00	\$10,257
TOTAL ANNUAL HOURS				251	13	25	
TOTAL ANNUAL BURDEN						289	\$11,710

<sup>a</sup> AxBxC=D

<sup>b</sup> Assume 2 new sources per year at one new facility and 55 existing process units subject to NESHAP V, but not the HON.

<sup>c</sup> Assume 20 percent of initial performance test must be repeated due to failure.

<sup>d</sup> Annual cost is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical - \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

TABLE F.11: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT FOR SUBPARTS F, G, H, and I

Burden Item	Average Hours per Activity (a)	Number of Activities per Year (b)	Estimated Technical Hours per year (c)	Estimated Managerial Hours per year (d)	Estimated Clerical Hours per year (e)	Annual Cost \$ (f)
REPORTS REVIEW:						
1) Initial	2	5	10	1	1	\$494
2) Implementation Plan or Permit	20	5	100	5	10	\$4,662
3) Compliance status	40	5	200	10	20	\$9,325
4) Review equipment leak monitoring	7	240	1680	84	168	\$78,327
5) Notification of Construction/Reconstruction.	2	5	10	1	1	\$494
6) Notification of anticipated startup	2	5	10	1	1	\$494
7) Notification of actual startup	2	5	10	1	1	\$494
8) Notification of Performance Test	2	5	10	1	1	\$494
9) Review of test results	8	5	40	2	4	\$1,865
10) Review periodic reports	4	640	2560	128	256	\$119,356
TOTAL ANNUAL HOURS			4630	234	463	
TOTAL ANNUAL BURDEN					5327	\$216,005

See Attachment H for assumptions and further description of activities.

ATTACHMENT G: RESPONDENT BURDEN AND COST FOR  
REFERENCING SUBPARTS

TABLE G.1: ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART Ka<sup>a</sup>

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
1. Applications	N/A						
2. Surveys and Studies	N/A						
3. Reporting Requirements							
A. Read Instruction	Included in 3B						
B. Required Activities							
Vapor recovery information	20	1	0	0	0	0	\$0
Measure seal gap	Included in 4E						
C. Create Information	Included in 3B						
D. Gather Existing Information	1	1	157 <sup>c</sup>	157	8	16	\$14,437
E. Write Report							
Notification of construction	2	1	0	0	0	0	\$0

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
Notification of actual startup	2	1	0	0	0	0	\$0
Notification of gap measurement	1.5	1	188 <sup>c</sup>	282	14	28	\$25,865
Report of seal gap excess	2.5	1	6 <sup>d</sup>	15	1	2	\$1,422
Information on vapor recovery	Included in 3B.						
Total Annual Responses (Block 13b)	194						
4. Recordkeeping Requirements							
A. Read Instructions	Included in 3B.						
B. Plan Activities	Included in 3B						
C. Implement Activities	Included in 3B						
D. Develop Record System	N/A						
E. Time to Enter Information							

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
New tank seal gap measurements	250	1	0	0	0	0	\$0
Secondary seal gap measurement	250 <sup>d,e</sup>	1	157 <sup>c</sup>	39,250	1,963	3,925	\$3,602,629
Primary seal gap measurements	100 <sup>d</sup>	0.2 <sup>f</sup>	31 <sup>c</sup>	620	31	62	\$56,907
Fill/refill record	2 <sup>h</sup>	1	35 <sup>g</sup>	70	4	7	\$6,473
TOTAL ANNUAL HOURS				40,394	2,021	4,040	
TOTAL ANNUAL BURDEN					46,455		\$3,707,733

<sup>a</sup> Assume that there will be no new source subject to the requirements of this regulation. Similar new sources will be subject to NSPS Subpart Kb. There are 174 existing sources with an average of 50 tanks per facility.

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> Estimate that 10 percent of respondents (17) will use a vapor recovery control system and 90 percent (157) will use a floating roof system. Respondents using vapor recovery control are not required to do seal gap measurements. All of the tanks using floating roof (157) will perform a secondary seal gap measurement. 20 percent (31) will conduct a primary seal gap measurement. 157 + 31 = 188 respondents submitting a notification of either primary or secondary gap measurement.

<sup>d</sup> Assume that 3 percent of respondents using a floating roof will have excessive seal gaps (primary or secondary) requiring that a single report be filed once a year.

- <sup>e</sup> Estimate five hours to conduct secondary seal measurements annually for the average 50 tanks per respondent.
- <sup>f</sup> Estimate two hours to conduct primary seal measurements every five years for the average 50 tanks per respondent.
- <sup>g</sup> During any one year, a respondent would change liquid in approximately 20 percent of the facilities (35).
- <sup>h</sup> Estimate 0.2 hours to record a liquid change per tank in 20 percent (10) of the average of 50 tanks per facility.



TABLE G.2: ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART Kb

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
1. Applications	N/A						
2. Surveys and Studies	N/A						
3. Reporting Requirements							
A. Read Instruction	1	1	37d	37	2	4	\$3,423
B. Required Activities							
<u>One-Time Only Requirements</u>							
Notification of Start of Construction	2	1	37	74	4	7	\$6,804
Notification of Actual Startup	2	1	37	74	4	7	\$6,804
Notification of Physical or Operational Changesc	N/A						
Notification of Malfunctionc	N/A						
Notification of Initial Inspection							

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
IFR Internal Inspection	2	1	28 <sup>d</sup>	56	3	6	\$5,176
EFR Gap Measurement	2	1	7 <sup>d</sup>	14	1	1	\$1,297
Initial Inspection Report							
IFR Internal Inspection Report	12	1	28 <sup>d</sup>	336	17	34	\$30,876
EFR 2nd Seal Gap Measurement	8	1	7	56	3	6	\$5,176
EFR 1st Seal Gap Measurement	12	1	7	84	4	8	\$7,674
CVS Operating Plan Report	8	1	2	16	1	2	\$1,505
<u>Repeat Requirements</u> Internal IFR Inspection <sup>e</sup>	12	1	116	1,392	70	139	\$127,796
Visual IFR Inspection <sup>e</sup>	8	1	464	3,712	186	371	\$340,738
Report of IFR Failure <sup>f</sup>	2	1	55	110	6	11	\$10,145

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
Notification of Delay of Repair or Emptying for IFR <sup>g</sup>	4	1	6	24	1	2	\$2,167
EFR 2nd Seal Gap Measure Report	8	1	580	4,640	232	464	\$425,885
EFR 1st Seal Gap Measure Report	12	1	580	6,960	348	696	\$638,827
Notification of Refill <sup>h</sup>	2	1	602	1,204	60	120	\$110,474
Number of Responses (Block 13b)			1976				
<b>4.RECORDKEEPING REQUIREMENTS</b>							
A. Read Instructions	1	1	37	37	2	4	\$3,423
B. Gather and Record Information							
i. Vessel Volumes, Liquid Vapor Pressure, flares	8	1	580	4,640	232	464	\$425,885
ii. 113b(a) inspection	12	1	580	6,960	348	696	\$638,827
iii. 113b(b) gap measurement	12	1	580	6,960	348	696	\$638,827
C. Develop Record System	10	1	3	30	2	3	\$2,802

	(A) hr/ Occurrence	(B) Occurrences/ plant/yr	(C) <sup>a</sup> Plants/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
D. Time to Enter Information - CVS Parameter Records	2	52	355	36,920	1,846	3,692	\$3,388,721
F. Train Personnel	N/A						
G. Audits	N/A						
TOTAL ANNUAL HOURS				74,336	3,720	7,433	
TOTAL ANNUAL BURDEN					85,489		\$6,823,252

<sup>a</sup> Estimate that there are 580 existing respondents with an average of 7,254 regulated vessels in service over the next three years. Estimate that 75 percent (5468) of vessels have IFR and 20 percent (1458) have EFR and 5 percent (355) have closed-vent control systems. This does not include sources subject to both Subpart Kb and the HON, which are assumed to be complying with the HON.

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> The General Provision notifications of modification or malfunction will be covered by notification within the subpart.

<sup>d</sup> Assume that there will be 37 new respondents each of the next three years, which includes 28 IFR and 7 EFR and 2 CVS.

<sup>e</sup> For each of the 5,468 IFRs at 580 respondents, eighty (80) percent (464) will conduct an annual visual inspection, and 20 percent (116) will conduct an internal inspection. These activities are required to generate the information for the IFR failure report and the EFR primary and secondary seal gap reports, but do not generate a response for the purposes of the total for Block 13b.

<sup>f</sup> One percent failure rate for the 5468 IFRs choosing annual visual inspections equals approximately 55.

<sup>g</sup> Ten percent of 55 failed IFRs are delayed in repair or emptying equals approximately 6.

<sup>h</sup> Assume that all 5,468 IFR tanks will be routinely serviced through a shutdown and degassed once every ten years. One tenth the 5468 IFR will be degassed each year for an annual average of 547 per year. This number was added to the estimated 55 visual inspection failures that would lead to internal inspections for a total estimate of 602 notices of refill.

TABLE G.3: ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART VV

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) <sup>a</sup> Respondents/yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							
A. <u>Read Instructions</u>	1	1	<u>16</u>	<u>16</u>	<u>1</u>	<u>2</u>	<u>\$1,505</u>
B. <u>Required Activities</u> Initial Performance Test Report	48	1	<u>16</u>	<u>768</u>	<u>38</u>	<u>77</u>	<u>\$70,461</u>
Repeat Performance Test Report	48	1	<u>3c</u>	<u>144</u>	<u>7</u>	<u>14</u>	<u>\$13,181</u>
C. <u>Create Information</u>	Included in 3B						
D. <u>Gather Existing Information</u>	Included in 3E						

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) <sup>a</sup> Respondents/yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
E. <u>Write Report</u> New Sources Notification of Construction	2	1	10	<u>20</u>	<u>1</u>	<u>2</u>	<u>\$1,836</u>
Notification of Reconstruction/ Modification	2	1	<u>6</u>	<u>12</u>	<u>1</u>	<u>1</u>	<u>\$1,132</u>
Notification of Actual Startup	2	1	<u>16</u>	<u>32</u>	<u>2</u>	<u>3</u>	<u>\$2,967</u>
Notification of Initial/Repeat Performance Test	2	1	<u>19</u>	<u>38</u>	<u>2</u>	<u>4</u>	<u>\$3,506</u>
Existing Sources Semiannual Report	4.125	2	<u>556</u>	4,587	229	459	\$420,999
Total Annual Responses (Block 13b)			1182				

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) <sup>a</sup> Respondents/yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
4. Recordkeeping Requirements A. <u>Read Instructions</u>	Included in 3A						
B. <u>Plan Activities</u>	Included in 4C						
C. <u>Implement Activities</u>	Included in 3B						
D. <u>Develop Record System</u>	N/A						
E. <u>Time to Enter Information</u> Records of Operating Parameters	87	1	556	48,372	2,419	4,837	\$4,439,878
F. <u>Train personnel</u>	N/A						
G. <u>Audits</u>	N/A						
TOTAL ANNUAL HOURS				53,989	2,700	5,399	

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) <sup>a</sup> Respondents/yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr
<b>TOTAL ANNUAL BURDEN</b>					62,088		\$4,955,465

<sup>a</sup> Assume that there will be an average 16 new, modified, or reconstructed facilities each year over the next 3 years. Estimate that 10 of new affected sources will be due to construction and 6 will be reconstructed or modified. There are estimated to be an annual average of 555 affected sources over each of the next three years. This does not include sources subject to both Subpart VV and the HON, which are assumed to be complying with the HON.

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.



TABLE G.4: ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART DDD

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							
A. <u>Read Instructions</u>	1	1	10c	10	1	1	\$966
B. <u>Required Activities</u> Initial Performance Test Report	360	1	10	3600	180	360	\$330,428
Repeat Performance Test Report	360	1	2d	720	36	72	\$66,086
C. <u>Write Report</u> Notification of Construction/Modific ation	2	1	10	20	1	2	\$1,836
Notification of Actual Startup	1	1	10	10	1	1	\$966

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Notification of Initial Performance Test	2	1	10	20	1	2	\$1,836
Semiannual Report	3	2	90e	540	27	54	\$49,564
Total Annual Responses (Block 13b)							222
4. Recordkeeping Requirements							
Record of Operating Parameters for Control Devices	1	12	10	120	6	12	\$11,014
Records of Operating Conditions Exceeding Last Performance Test	1	8	90	720	36	72	\$66,086

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Records of Startup, Shutdown, Malfunction, etc.	0.25	5	90	113	6	11	\$10,351
<b>TOTAL ANNUAL HOURS</b>				5873	295	587	
<b>TOTAL ANNUAL BURDEN</b>					6755		\$539,133

<sup>a</sup>  $A \times B \times C = D$

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> Assume 10 new affected sources per year.

<sup>d</sup> Assume 20 percent of performance tests are repeated due to failure.

<sup>e</sup> Average number of affected sources over next three years.

TABLE G.5 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART III

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							0
A. <u>Read Instructions</u>	1	1	1 <sup>c</sup>	1	0	0	\$83
B. <u>Required Activities</u> Initial Performance Test Report	60	1	1	60	3	6	\$5,507
Repeat Performance Test Report	60	1	0.2 <sup>d</sup>	12	1	1	\$1,132
C. <u>Write Report</u> Notification of Construction/Modific ation	2	1	1	2	0	0	\$165
Notification of Actual Startup	1	1	1	1	0	0	\$83

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Notification of Initial Performance Test	2	1	1	2	0	0	\$165
Semiannual Report	3	2	11 <sup>e</sup>	66	3	7	\$6,046
Total Annual Responses (Block 13b)			26				
4. Recordkeeping Requirements							
Record of Operating Parameters for Control Devices	1	12	1	12	1	1	\$1,132
Records of Operating Conditions Exceeding Last Performance Test	1	8	11	88	4	9	\$8,047

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Records of Startup, Shutdown, Malfunction, etc.	0.25	5	11	14	1	1	\$1,276
TOTAL ANNUAL HOURS				258	13	25	
TOTAL ANNUAL BURDEN					296		\$23,636

<sup>a</sup>  $A \times B \times C = D$

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> Assume 1 new affected source per year subject to Subpart III and not the HON.

<sup>d</sup> Assume 20 percent of performance tests are repeated due to failure.

<sup>e</sup> Average number of affected sources over next three years. This does not include sources subject to both Subpart III and the HON, which are assumed to be complying with the HON.

TABLE G.6 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART NNN

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							
A. <u>Read Instructions</u>	1	1	177 <sup>c</sup>	177	9	18	\$16,273
B. <u>Required Activities</u> Initial Performance Test Report	60	1	177	10,620	531	1,062	\$974,762
Repeat Performance Test Report	60	1	35 <sup>d</sup>	2,100	105	210	\$192,750
C. <u>Write Report</u> Notification of Construction/Modific ation	2	1	177	354	18	35	\$32,504
Notification of Actual Startup	1	1	177	177	9	18	\$16,273

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Notification of Initial Performance Test	2	1	177	354	18	35	\$32,504
Semiannual Report	3	2	1345 <sup>e</sup>	8,070	404	807	\$740,757
Total Annual Responses (Block 13b)			3,433				
4. Recordkeeping Requirements							
Record of Operating Parameters for Control Devices	1	12	177	2,124	106	212	\$194,916
Records of Operating Conditions Exceeding Last Performance Test	1	8	1345	10,760	538	1,076	\$987,612



Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondent s/year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Records of Startup, Shutdown, Malfunction, etc.	0.25	5	1345	1,681	84	168	\$154,303
<b>TOTAL ANNUAL HOURS</b>				36,417	1,822	3,641	
<b>TOTAL ANNUAL BURDEN</b>					41,880		\$3,342,654

<sup>a</sup>  $A \times B \times C = D$

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> Assume 177 new affected sources per year subject to Subpart NNN and not the HON.

<sup>d</sup> Assume 20 percent of performance tests are repeated due to failure.

<sup>e</sup> Average number of affected sources over next three years. This does not include sources subject to both Subpart NNN and the HON, which are assumed to be complying with the HON.

TABLE G.7 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART RRR

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							
A. <u>Read Instructions</u>	1	1	20 <sup>c</sup>	20	1	2	\$1,836
B. <u>Required Activities</u> Initial Performance Test Report	60	1	20	1,200	60	120	\$110,143
Repeat Performance Test Report	60	1	4 <sup>d</sup>	240	12	24	\$22,029
C. <u>Write Report</u> Notification of Construction/ Modification	2	1	20	40	2	4	\$3,671
Notification of Actual Startup	1	1	20	20	1	2	\$1,836

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Notification of Initial Performance Test	2	1	20	40	2	4	\$3,671
Semiannual Report	3	2	155 <sup>e</sup>	930	47	93	\$85,409
Total Annual Responses (Block 13b)							394
4. Recordkeeping Requirements							
Record of Operating Parameters for Control Devices	1	12	20	240	12	24	\$22,029
Records of Operating Conditions Exceeding Last Performance Test	1	8	155	1,240	62	124	\$113,814

Activity	(A) Hours per Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr <sup>a</sup>	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) \$ Cost/yr <sup>b</sup>
Records of Startup, Shutdown, Malfunction, etc.	0.25	5	155	194	10	19	\$17,798
TOTAL ANNUAL HOURS				4,164	209	416	
TOTAL ANNUAL BURDEN					4,789		\$382,236

<sup>a</sup>  $A \times B \times C = D$

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr.

<sup>c</sup> Assume 20 new affected sources per year subject to Subpart RRR and not the HON.

<sup>d</sup> Assume 20 percent of performance tests are repeated due to failure. ( $.2 \times 20 = 4$ )

<sup>e</sup> Average number of affected sources over next three years. This does not include sources subject to both Subpart RRR and the HON, which are assumed to be complying with the HON.

TABLE G.8 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART BB

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
1. Applications							
Application for approval of Construction/Modification	N/A						
2. Surveys and Studies							
N/A							
3. Reporting Requirements							
A. Read Instruction	1	1	0	0	0	0	\$0
B. Required Activities							
Initial emission test	20	0	0	0	0	0	\$0
Monitoring performance test	280	1	0	0	0	0	\$0
Vapor-tightness test tank truck and railcars	11	1	3 <sup>c</sup>	33	2	3	\$3,050
Marine vessels	80	1	66 <sup>c</sup>	5,280	264	528	\$484,627
Closed vent leak inspection	8	1	54 <sup>c</sup>	432	22	43	\$39,681

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
C. Create Information	Included in 3B						
D. Gather Existing Information	Included in 3E						
E. Write Report							
Notification of anticipated startup	2	0	0	0	0	0	\$0
Notification of actual startup	2	0	0	0	0	0	\$0
Notification of emission test	2	0	0	0	0	0	\$0
Report of emission test	8	0	0	0	0	0	\$0
Notification of performance test	2	0	0	0	0	0	\$0
Report of performance test	8	0	0	0	0	0	\$0
Report facilities below cut-off <sup>d</sup>	8	0	0	0	0	0	\$0
Quarterly parameter excesses	4	4	54	864	43	86	\$79,266

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
Total Annual Responses (Block 13b)	216						
SUBTOTAL							
4. Recordkeeping Requirements							
A. Read Instructions	Included in 3A						
B. Plan Activities	Included in 4C						
C. Implement Activities	Included in 3B						
D. Develop Record System	N/A						
E. Time to Enter Information							
i. Facilities above cut-off	1.5	52	54	4,212	211	421	\$386,631
ii. Facilities below cut-off <sup>d</sup>	0.5	52	0	0	0	0	\$0
F. Train Personnel	N/A						
G. Audits	N/A						

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
TOTAL ANNUAL HOURS				10,821	542	1,081	
TOTAL ANNUAL BURDEN					12,444		\$993,255

<sup>a</sup> Expect that there will be no new sources covered by these standards over the next three years.

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr.

<sup>c</sup> Estimate that there are 54 facilities subject to this standard. Estimate there are 3 tank truck and railcars and 131 marine vessels subject to the standards. All other transfer racks subject to Subpart BB are assumed to be complying with the HON. Assume 50 percent of the marine vessels (66) operate at negative pressure and do not conduct annual vapor-tightness tests.

<sup>d</sup> For sources below the low quantity applicability for control requirements, a report is only required the first year of operation. It is assumed that this report has been submitted.



TABLE G.9 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART Y

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
1. Applications							
Application for approval of Construction/Modification	N/A						
2. Surveys and Studies							
3. Reporting Requirements							
A. Read Instructions	Included in 3C						
B. Required Activities							
Initial performance test	N/A						
C. Create Information							
Annual IFR Internal Inspections and EFR Seal Gap measurements (existing sources)	8	1	4	32	2	3	\$2,967
D. Gather Existing Information	Included in 3C						
E. Write Report							
New Sources							

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
Notification of Construction/ Reconstruction	Included in NSPS Kb						
Notification of anticipated startup	Included in NSPS Kb						
Notification of actual startup	Included in NSPS Kb						
Notification of emission test	N/A						
Report of emission test	N/A						
Notification of Control installation and refill at 1st IFR Degassing <sup>c</sup>	2	1	0	0	0	0	\$0
Existing Sources							
Annual Inspection Reports	2	2	4	16	1	2	\$1,505
Supplemental Delay Report <sup>d</sup>	2	1	0	0	0	0	\$0
Quarterly Emission Report	None Expected <sup>e</sup>						
Total Annual Responses (Block 13b)	8						
4. Recordkeeping Requirements							

	(A) hr/ Occurrence	(B) Occurrences/ Respondent/yr	(C) <sup>a</sup> Respondent/ yr	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) Cost/yr <sup>b</sup>
A. Read Instructions	Included in 3A						
B. Plan Activities	Included in 4C						
C. Implement Activities - Filing and Maintaining Records	2	1	4	8	0	1	\$704
D. Develop Record System	Included in 4C						
E. Time to Enter Information	Included in 4C						
F. Train Personnel	N/A						
G. Audits	N/A						
TOTAL ANNUAL HOURS				56	3	6	
TOTAL ANNUAL BURDEN					65		\$5,176

<sup>a</sup> Estimate that there will be 4 existing sources not covered by the HON. All new source burden is included in the NSPS Subpart Kb regulation for storage vessels at 40 CFR Part 60

<sup>b</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>c</sup> It is believed that all vessels have been degassed and all controls have been installed as they were to be installed within 10 years of promulgation.

<sup>d</sup> Estimate that two percent of existing sources will request delay of repair in the annual report.

<sup>e</sup> Assume that no sources will select the fixed roof vented to a control device option and thus have no quarterly reports of excess emissions.

TABLE G.10 ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR SUBPART V

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) <sup>a</sup> Cost/year
1. Applications	N/A						
2. Survey and Studies	N/A						
3. Reporting Requirements							
A. <u>Read Instructions</u>	1	1	2 <sup>b</sup>	2	0	0	\$165
B. <u>Required Activities</u> Initial Performance Test	20	1	2	40	2	4	\$3,671
Reference Method 21/22 Tests	4	1	2	8	0	1	\$704
Repeat Performance Test	20	0.2	2	8	0	1	\$704
C. <u>Create Information</u>	See 3B						

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) <sup>a</sup> Cost/year
D. <u>Gather Existing Information</u>	See 3B						
E. <u>Write Report</u> Notification of Construction/ Reconstruction	2	1	2	4	0	0	\$331
Notification of Anticipated Startup	2	1	2	4	0	0	\$331
Notification of Actual Startup	2	1	2	4	0	0	\$331
Notification of Initial Performance Test	2	1	2	4	0	0	\$331
Report of Performance Test	See 3B						
Application for Alternative	10	1	0.5	5	0	1	\$456
Initial Report	8	1	2	16	1	2	\$1,505

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) <sup>a</sup> Cost/year
Semiannual Report	30	2	55 <sup>c</sup>	3,300	165	330	\$302,892
Total Annual Responses (Block 13b)			123				
4. Recordkeeping Requirements							
A. <u>Read Instructions</u>	See 3A						
B. <u>Plan Activities</u>	See 4C						
C. <u>Implement Activities</u>	See 3B						
D. <u>Develop Record System</u>	N/A						
E. <u>Time to Enter Information</u> Records of startups, shutdown, malfunction, etc.	1.5	1	2	3	0	0	\$248

Activity	(A) Hours/ Occurrence	(B) Occurrences/ respondent/ year	(C) Respondents/ year	(D) Technical hr/yr	(E=D*.05) Managerial hr/yr	(F=D*.10) Clerical hr/yr	(G) <sup>a</sup> Cost/year
Records of operating, parameters and emissions	0.1	365 <sup>d</sup>	55 <sup>c</sup>	2,008	100	201	\$184,234
Records of leak detected	0.4	52	55	1,144	57	114	\$104,966
F. Train personnel	N/A						
G. Audits	N/A						
TOTAL ANNUAL HOURS				6,550	325	654	
TOTAL ANNUAL BURDEN					7,529		\$600,869

<sup>a</sup> United States Department of Labor, Bureau of Labor Statistics, September 2004, "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. Technical - \$82.47/hr; Managerial - \$96.41/hr; Clerical - \$42.25/hr

<sup>b</sup> Assume one new facility per year comprising two new sources.

<sup>c</sup> Estimate 21 existing facilities comprising 55 sources.

**TABLE G.11: NEW SOURCE ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE HON**

Burden Item	Average Hours per Activity (a)	Number of Activities per year per respondent (b)	Technical Hours per year per respondent (c)	Estimated. Number New respondents (d)	Estimated Technical Hours per year (e)	Estimated Managerial Hours per year (f)	Estimated Clerical Hours per year (g)	Annual Cost per year (h)
1) Read Rule and	2.7	93	250	5	1,250	63	125	\$114,780
2) Plan Activities	3.8	93	355	5	1,775	89	178	\$162,964
3) Training	3.5	38	132	5	660	33	66	\$60,578
4) Create, Test, Development	2.4	1,778	4,266	5	21,330	1,067	2,133	\$1,957,833
5) Gather Information,	1.4	2,102	2,943	5	14,715	736	1,472	\$1,350,669
6) Process/ Compile and Review	0.8	50	40	5	200	10	20	\$18,357
7) Complete Reports	11.4	49	557	5	2,785	139	279	\$255,620
Total Annual Responses (Block 13b)				245				
8) Record/Disclose	10.0	49	489	5	2,445	122	245	\$224,413
9) Store/File	5.2	51	264	5	1,320	66	132	\$121,157
TOTAL ANNUAL HOURS					46,480	2,325	4,650	
TOTAL ANNUAL BURDEN						53,455		\$4,266,371

(a) = (c)/(b)

(d) - From previously approved ICR.

See Attachment I for assumptions and further description of activities.



TABLE G.12: EXISTING SOURCE ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE HON PROVISIONS

Burden Item	Average Hours per Activity (a)	Number of Activities per year per respondent (b)	Total Technical Hours per year per respondent (c)	Technical Hours per year per respondent for wastewater (d)	Estimated Technical Hours per year (e)	Estimated Managerial Hours per year (f)	Estimated Clerical Hours per year (g)	Annual Cost \$per year (h)
1) Read Rule and	3.6	23	69	14	17,680	884	1,768	\$1,097,548
2) Plan Activities	6.1	13	61	18	16,080	804	1,608	\$998,222
3) Training	5.3	4	17	4	4,400	220	440	\$273,145
4) Create, Test, and Development	17.8	99	1617	150	400,080	20,004	40,008	\$24,836,366
5) Gather Information,	2.5	677	1693	0	406,320	20,316	40,632	\$25,223,736
6) Process/ Compile and Review	20.0	1	20	0	4,800	240	480	\$297,977
7) Complete Reports	81.2	5	388	18	94,560	4,728	9,456	\$5,870,143
Total Annual Responses (Block 13b) <sup>a</sup>				1,600				
8) Record/Disclose	17.5	26	442	12	107,040	5,352	10,704	\$6,644,883
9) Store/File	6.8	35	222	15	54,480	2,724	5,448	\$3,382,037
TOTAL ANNUAL HOURS					1,105,440	55,272	110,544	

Burden Item	Average Hours per Activity (a)	Number of Activities per year per respondent (b)	Total Technical Hours per year per respondent (c)	Technical Hours per year per respondent for wastewater (d)	Estimated Technical Hours per year (e)	Estimated Managerial Hours per year (f)	Estimated Clerical Hours per year (g)	Annual Cost \$per year (h)
TOTAL ANNUAL BURDEN							1,271,256	\$68,624,057

(a) = (c + d)/(b)

(c) - there are 240 existing sources out of the 320 total that will continue to comply with the HON.

(d) - the 80 facilities complying with the CAR will still be required to comply with the HON for wastewater.

<sup>a</sup> Total number of respondents is 320 ( 240 for HON + 80 CAR still complying with HON Wastewater).

See Attachment I for assumptions and further description of activities.



**Assumptions and Item Descriptions for Attachment F: Table F.11**

(A) That all existing and new sources must submit an initial report within 120 days of promulgation and an implementation plan or permit application within 12 or 18 months of the compliance date. It is assumed that initial reports and implementation plans have been submitted for existing sources and these reports are only required for new sources. The new sources are most likely to be collocated within existing plants and be included in those existing source reports.

(B) That semiannual reports of results from equipment leak detection and repair programs are required by the equipment leak standard. Sources are required to comply with the equipment leak standard by 6 months after promulgation. It is assumed that an average of 320 facilities will submit reports semiannual (320 x 2 = 640) (even those that use the CAR will still have to submit reports under the HON for wastewater).

Item Descriptions:

(a) Average Hours per Activity are estimates of the specific activities and are the basis for estimating the overall burden.

(b) Number of Activities per year represents the number of reports expected to be reviewed and other related activities during the course of the year. Under the performance test headings, these numbers are based upon assumptions (A) and (B), above. For one-time reports, the total number of reports expected over the three-year period was divided by three to get an annual average incorporating assumption (C), above.

(c) Estimated Technical Hours per year is the product of (a) and (b).

(d) Estimated Managerial Hours per year is 5 percent of (c).

(e) Estimated Clerical Hours per year is 10 percent of (c).

(f) Estimated Annual Cost per year is the sum of costs for technical, managerial, and clerical hours based on rates from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay.

Technical - \$41.57 (GS-12, Step 1, \$25.98 x 1.6)

Managerial - \$56.02 (GS-13, Step 5, \$35.01 x 1.6)

Clerical \$22.50 (GS-6, Step 3, \$14.06 x 1.6)

$$(H^t \times \$41.57/\text{hour}) + (H^m \times \$56.02/\text{hour}) + (H^c \times \$14.06/\text{hour}) = (G)$$

Where:

H<sup>t</sup> is (c), or technical hours

H<sup>m</sup> is (d), or managerial hours, and

H<sup>c</sup> is (e), clerical hours

REPORTS REVIEW:

1) Initial represents the EPA review of all initial reports received.

2) Implementation Plan or Permit Applications represents the EPA review of all implementation plans, or permit applications if submitted in lieu of an implementation plan.

3) Compliance Status represents compliance status verification by the EPA for the portions of the standard which a source must comply with before the compliance date (see assumption (D) above).

4) Review equipment leak monitoring represents the review and screening of periodic reports received as a result of the equipment leaks standard.

5) Notification of construction/reconstruction represents the EPA review of this notification from new sources.

6) Notification of anticipated startup represents the EPA review of this notification from new sources.

7) Notification of actual startup represents the EPA review of this notification from new sources.

8) Notification of performance test represents the EPA review of this notification from new sources.

9) Review of test results represents the EPA review of performance test results for new sources.

10) Review periodic reports represents the EPA review of periodic reports.

TOTAL BURDEN AND COST is the sum of each of the columns (d), (e), (f) and (g).

**Assumptions and Item Descriptions for Attachment G: Tables G.11 and G.12**

Assumptions are:

(A) That there are 240 existing facilities out of 320 that will continue to comply with the HON, rather than the CAR. The 80 facilities complying with the CAR will still be required to comply with the HON wastewater provisions, as the CAR does not include wastewater provisions. The total number of facilities will increase by 5 new facilities per year. Since new facilities must be in compliance at startup, the general periodic recordkeeping and reporting burdens are included, which accounts for the difference in the technical hours per facility. No new facilities are expected to comply directly with the CAR.

(B) That the average representative source, new and existing, will consist of the following points of burden:

- 20 parameters to monitor at control devices throughout the facility
- 10 affected storage tanks of various capacities
- 3 affected major wastewater streams
- 4 affected transfer rack operations
- 3 overall leak detection and repair programs for 2,000 points
- 1 emissions averaging program that involves 10 emission points
- 1 facility wide inventory of emission points, Group 1 and Group 2
- 8 Process vents per facility

(C) That there are 5 percent (.05) managerial and 10 percent (.10) clerical hours required for every technical hour.

(D) That some activities necessary to generate reports involve creating records in the process, and that these activities are assumed to be reports activities alone, to avoid double counting these as records activities as well. Therefore, only items 8 and 9 are considered records burdens directly.

Item Descriptions:

(a) Average Hours per Activity is back-calculated by dividing (b) into (c). Since the activities within each burden category can vary significantly, it is too inaccurate to assume an average to use to calculate (c). Estimated activity technical hours are summarized to obtain (c) first, then back calculate for (a) with an estimated (b).

(b) Estimated Number of Activities per year per source represents the assumed typical number of separate activities a source may encounter during one year. This number may vary from facility to facility depending on consolidation of activities, collocated readings, etc. Since so much variability exists, it is important to note that this is an estimate. This number was only used to back-calculate (a).

(c) Technical Hours per year per source is the actual best estimate of the burden for each burden item. The three-year separate activity burdens were divided by three, where appropriate, and then summarized to include in this column. The technical hours for new sources is higher because some periodic compliance reports and records are required at startup. Existing sources do not encounter these reports and record burdens for three years after promulgation.

(d) (Table G.11) Estimated Number of New Sources reflect the number given in assumption (A), above. (Table G.12) Technical Hours Per Year Per Source for Wastewater are the annual technical hours associated with recordkeeping and reporting to ensure compliance with requirements for wastewater. As discussed in assumption (A), facilities complying with the CAR will comply with the HON wastewater requirements. Burden hours per source, per emission type are shown in Table B.1.

(e) Estimated Technical Hours per year is the product of (c) and (d) for new facilities (Table G.11). For Table G.12, estimated technical hours are the product of (c) and the number of existing facilities complying with all of the HON (240) added to the product of (d) and the number of facilities complying with only the wastewater provisions (80).

(f) Estimated Managerial Hours per year is 5 percent of (e).

(g) Estimated Clerical Hours per year is 10 percent of (e).

(h) Estimated Annual Cost per year is from the United States Department of Labor, Bureau of Labor Statistics, September 2004, "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.

$$(H^t \times \$82.74/\text{hour}) + (H^m \times \$96.41/\text{hour}) + (H^c \times \$42.25/\text{hour}) = (G)$$

Where:

$H^t$  is (e), or technical hours

$H^m$  is (f), or managerial hours, and

$H^c$  is (g), clerical hours

1) Read Rule and Instructions are the activities, less training, which involve comprehending the provisions in the standard and understanding how they apply to the respective points at a facility.

2) Plan Activities represents such burdens as design, redesign, scheduling as well as drafting the implementation plan, and selecting methods of compliance.

3) Training represents the portion (assumed 40 percent) of activities from 1) Read Rule and Instruction for which an average facility would elect to provide class room instruction. The standard does not require specific training itself.

4) Create, Test, Research and Development are the activities involving testing, retesting, establishing operating range for parameters and analyzing point by point applicability. Monitor related refit, calibration and maintenance activities are also included under this heading.

5) Gather Information, Monitor and Inspect are the activities involving physical inspections of equipment, collection of monitored data and other related activities.

6) Process/Compile and Review are the activities that involve analysis of the information collected for accuracy, compliance and appropriate reports and records required as a result.

7) Complete Reports represents the activities normally associated with filling out forms. Since the standard requires no standard forms, these activities relate to the preparing of formal reports and cover letters as appropriate.

8) Record/Disclose are activities which are solely recordkeeping which occur once the appropriate report information has been extracted [see assumption (D)] above. These activities involve software translation, duplication or archival processes normally associated with data management and storage common to this industry.

9) Store/File are again activities which are solely recordkeeping which occur once the appropriate report information has been extracted (see assumption (D) above). These activities involve the management life cycle of records, from the time they are filed and boxed up, to the time they are disposed.

TOTAL BURDEN AND COST is the sum of each of the columns (e), (f), (g) and (h).



**Summary of Capital/Startup and Operation and Maintenance Costs for the CAR and the Referencing Subparts**

**NSPS Subpart Ka**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
The total Capital/Start-up costs for this ICR are \$ 0.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The total Operating and Maintenance (O&M) Costs for this ICR is \$ 0.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$0.

**NSPS Subpart Kb**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
The total Capital/Start-up costs for this ICR are \$27,000. This is the cost for 2 new storage tanks to install monitoring equipment associated with the CVS routed to a control device. The storage tanks will use equipment similar to that used for subparts NNN and III; therefore the startup costs is approximately \$13,500 per facility for a total of \$27,000. There are no capital/startup costs for the remaining 35 new storage tanks complying by either an IFR or EFR.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The average annualized burden is estimated to be \$1,350 per year per affected facility (\$13,500 discounted over 10 years by straight line depreciation method) for both new and existing affected sources using CVS to a control device (31) for a total of \$41,850 .
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$68,850.

**NSPS Subpart VV**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
The capital/startup costs of this regulation are \$8,400. This is based on the average cost of a monitor (\$7,000) with a 5 year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is therefore 7000/5, or \$1400/yr. It is also estimated that 80 percent of facilities contract out LDAR services and 20 percent perform monitoring in-house. Those facilities which contract out will purchase one unit as backup; the remaining facilities

performing LDAR in-house will purchase two units each to support the program. For purposes of this analysis, it is assumed that all new sources are at facilities that do not already have a monitoring instrument. Assuming an average of three affected sources per facility, five facilities per year would need an instrument. The total number of units to be purchased is therefore  $(5 \times 0.8)(1 \text{ unit}) + (5 \times 0.2)(2 \text{ units}) = 6 \text{ units}$ .

- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The operation of the monitors is included in the monitoring costs. Maintenance costs on these units is incidental, therefore no maintenance or operation costs incur.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$8,400.

### **NSPS Subpart DDD**

- a. Total Capital/Startup cost of Monitoring Equipment:  
The capital/startup costs for this regulation are \$300,000. This is based on 10 new sources per year multiplied by \$30,000 per source for monitoring equipment.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The annual operation and maintenance costs are \$630,000 dollars. This is based on 80 existing sources plus 10 new sources over the life of the ICR multiplied by \$7,000 for upkeep of the monitoring devices.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$930,000.

### **NSPS Subpart NNN/III**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
The startup cost of monitoring equipment is approximately \$13,500 per new affected facility for both Subpart III, Air Oxidation Operations and Subpart NNN, Distillation Operations or a total of \$2,403,000 (total of 178 new sources x \$13,500/source).
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The average annualized burden is estimated to be \$1,350 per year per affected facility (\$13,500 discounted over 10 years by straight line depreciation method) for Subpart III and for Subpart NNN for a total of \$1,830,600 [ $(\$1350 \times 1356)$  total number of new and existing affected sources under NNN and III].
- c. Total Capital/Startup and O&M Cost:

The total Capital and O&M Costs are \$4,233,600.

**NSPS Subpart RRR**

- a. Total Capital/Startup cost of Monitoring Equipment:  
The capital/startup costs for this regulation are \$500,000 dollars per year. This is based on 20 new sources per year multiplied by \$25,000 for monitoring equipment discounted over 10 years at 7 percent.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The annual operation and maintenance costs are \$77,500 dollars. This is based on 155 existing sources multiplied by \$500 for upkeep of the monitoring device.
- c. Total Capital/Startup and O&M Cost:  
The total Capital/startup and O&M Costs are \$577,500.

**NESHAP Subpart BB**

- a. Total Capital/Startup cost of Monitoring Equipment:  
Startup cost were identified in previous ICR.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
There are no O&M cost associated because no CEMs are employed.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$0.

**NESHAP Subpart Y**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
The only type of industry costs associated with the information collection activity in the standards is labor cost. There are no capital/startup costs.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
There are no operation and maintenance costs.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$0.

**NESHAP Subpart V**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
Startup cost were identified in previous ICR.

- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
There are no O&M cost associated because no CEMs are employed.
- c. Total Capital and O&M Cost  
The total Capital and O&M Costs are \$0.

**NESHAP HON:**

**Subpart G**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
Estimate the cost to purchase monitoring equipment is approximately \$20-30K for process vents and wastewater operations, or an average of \$25K with a 10-year life expectancy and a 7 percent depreciation rate, or \$2225 per year. There are no associated costs for transfer racks and storage tanks. Only new sources need to buy Monitoring equipment; therefore, the total capital/startup cost is \$25,000 x 5 or \$125,000.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The cost to industry associated with the operation and maintenance (O&M) is approximately \$100-500K per year (capital/startup depreciation not included) for reactor process vents and wastewater operations. The cost associated with the operation and maintenance \$50-100K per year (capital/startup depreciation not included) for distillation units process vents. There are no associated costs for transfer racks and storage tanks. The average O&M cost is assumed to be the average of the two ranges, or \$275,000 per year. Operation and maintenance incur for both new and existing sources. The total O&M is therefore \$275,000 x 245 or \$67,375,000.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$67,500,000.

**Subpart H**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
Only new sources will buy an organic volatile analyzer. Estimate the average cost of a monitor is \$7,000 with a 5 year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is therefore \$7000/5 or \$1400/yr. Estimate that 80 percent of facilities contract out LDAR services and 20 percent perform in-house. Those facilities which contract out (4 facilities) will purchase one unit as backup; the remaining facilities performing LDAR in-house (1 facility) will purchase 5 units to support the program. The total annual capital/startup cost is therefore 9 units x 1400/unit or \$12,600/yr.

- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The operation of the monitors is included in the monitoring costs. Maintenance costs on these units is incidental, therefore, no maintenance or operation costs incur.
- c. Total Capital and O&M Cost for Subparts H, and I:  
The total Capital and O&M Costs are \$12,600.

**Part 65 CAR**

- a. Total Capital/Startup Cost of Monitoring Equipment:  
Under the CAR, it is assumed all new sources start out under the referencing subpart. Therefore, there is no capital/startup cost associated with this subpart.
- b. Total Cost of Operation and Maintenance of Monitoring Equipment:  
The HON is the basis for determining O&M costs for the CAR. The average cost per source, based on the HON is \$275,000 per year for a total of \$22,000,000.
- c. Total Capital/Startup and O&M Cost:  
The total Capital and O&M Costs are \$22,000,000.