

**ICR SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Site Remediation (40 CFR part 63, subpart GGGGG)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Site Remediation (40 CFR part 63, subpart GGGGG)

1(b) Short Characterization/Abstract

The final rule for the National Emission Standards for Hazardous Air Pollutants (NESHAP) Site Remediation was published in 40 CFR part 63, subpart GGGGG, and promulgated on October 8, 2003. These standards apply to site remediation activities that use certain types of equipment to clean up materials containing organics that potentially could be released to the atmosphere as a hazardous air pollutant (HAP). These site remediation activities can potentially be conducted at any facility where materials containing organic HAP currently are or have been stored, processed, treated, or otherwise managed at the facility. The types of businesses most likely to be subject to the rule include, but are not limited to, organic liquid storage terminals, petroleum refineries, chemical manufacturing facilities, and manufacturing facilities using organic materials.

A site remediation involves a clean up of hazardous substances in order to protect human health and the environment. These hazardous substances could potentially contaminate soil, groundwater, and the air. Owners and operators of the facilities subject to part 63, subpart GGGGG are required to perform this information collection.

Affected owners and operators subject to the rule are required to install and operate air emission controls and meet certain work practice standards. To demonstrate initial and continuous compliance with the rule requirements, affected owners and operators need to collect information to meet specific monitoring, inspection, recordkeeping, and reporting requirements.

The information collection requirements for the site remediation NESHAP are summarized in Section 4(b).

In general, all New Source Performance Standards (NSPS) require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for a required period of time following the date of such

measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Each respondent to this information collection is required to submit to the EPA a one-time notification of applicability of the respondent's facility to the final NESHAP. The respondents will be required to perform an annual performance test for each control device used to comply with the emission limitation standards and submit to the EPA/permitting authority a report following the test. Between performance tests, the respondents will be required to monitor selected operating parameters indicative of the control device performance and to maintain records of the monitoring results. Semiannually, the respondent will be required to prepare and submit to the EPA a compliance report describing any periods of control device operation during which the monitored values of the control device operating parameters deviated from the boundaries established during the most recent performance test.

For the affected sources subject to work practice standards, the respondents will be required to collect and maintain records of the air pollution equipment inspections and repairs, as specified in the rule. In addition, the respondents will need to maintain records of initial and subsequent determinations for any affected sources qualifying for an exemption from control requirements under the rule.

Records and reports must be retained for a total of five years. Records must be kept on-site for two of the five years, and for three of the years, records may be placed at an off-site location. The files can be maintained on microfilm, on computer or floppy disks, on magnetic tape disks, or on microfiche.

Based on our previous consultations with the industry, we estimate that there are approximately 286 facilities subject to this regulation and each facility has only one respondent (owner/operator). The Agency estimates that there has not been any growth in the industry since the previous ICR. The respondents submit the reports to the permitting authority on a semiannual basis as required by the regulation (the compliance report) and when a startup, shutdown, and malfunction (SSM) report is required in case the facility does not follow its approved SSM Plan (assumed twice a year) for a total of four semiannual reports per year.

An EPA Office of Air Quality and Planning Standards (OAQPS) projection for the next three years does not envision any growth of the industry. This estimate is based on an assessment of information from the EPA RCRA reporting system. Since the amounts of the treated material reported in the data base has been fairly constant over the years, the assumption is that this is not a growth industry for the next three years.

The Office of Management and Budget (OMB) approved the currently active ICR with the following Terms of Clearance: "Under the terms of the Government Paperwork Elimination Act, EPA should review this collection before resubmitting it for approval and ensure that, to the extent practicable, the collection has been revised to include electronic means of reporting." EPA has reviewed this collection and included ensure that, to the extent practicable, the collection has been revised to include electronic means of reporting. See section 4(b)(i).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act (CAA), as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new and existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction.

The EPA has determined that site remediation activities can be major sources of organic HAP (including benzene, ethyl benzene, toluene, vinyl chloride, xylenes) and other volatile organic compounds (VOC). The range of potential human health effects associated with exposure to these organic HAP and VOC include cancer, aplastic anemia, upper respiratory tract irritation, liver damage, and neurotoxic effects (e.g., headache, dizziness, nausea, tremors). The NESHAP Site Remediation rule implements CAA section 112(d) by requiring those affected site remediation activities to meet emission limitation, operating limit, and work practice standards reflecting the application of the maximum achievable control technology (MACT).

To implement and enforce this NESHAP, certain information is needed by the EPA to: 1) confirm the compliance status of major sources; 2) identify any non-major sources not subject to the standards; 3) identify new or reconstructed sources subject to the standards; and 4) ensure that the standards are being achieved. These recordkeeping and reporting requirements are specifically authorized by CAA section 114 (42 U.S.C. 7414) and are codified in the NESHAP General Provisions (40 CFR 63, subpart A).

In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

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

In the Administrator's judgment, volatile organic hazardous air pollutants (VOHAP) sources cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart GGGGG.

2(b) Practical Utility/Users of the Data

The information generated by monitoring, recordkeeping, and reporting requirements described in this ICR is used by EPA to assure compliance with the regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the emission standards at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance, if the continuous emission monitoring systems are not required.

The notifications required by the regulation are used to inform the Agency or delegated authority when a source becomes subject to the requirements and regulations. The reviewing authority may then inspect the source to check if the pollution devices are properly installed and operated and if the facility complies with the regulatory standards. The Agency/delegated authority may also observe the performance test.

The required semiannual compliance reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations. An extra SSM report is required when a facility does not follow the procedures in the approved SSM Plan.

To minimize the burden, much of the information the EPA needs to determine compliance is recorded and retained on-site at the facility. Such information will be reviewed by the enforcement personnel during an inspection and will not need to be routinely reported to the EPA. For situations other than when a deviation from the rule requirements has occurred, information required to be reported has been greatly reduced.

3. Nonduplication, Consultation, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart GGGGG.

3(a) Non-duplication

The reports are submitted to the permitting (state) authority as required by the regulation. No similar information requests are being carried out by the Federal government. Performance test reports from certain control devices and other information that is required by the site remediation NESHAP may duplicate information also required from a respondent by a state air regulatory agency. In such cases, a copy of the information submitted by a respondent to the state agency could be provided to the EPA. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on June 21, 2006 (71 FR 35652). No comments were received on the burden published in the Federal Register.

3(c) Consultations

It is our policy to review any comments received since the last ICR renewal including those submitted in response to the first Federal Register notice and respond appropriately. It should be noted that participants outside the EPA that were involved in the development of the site remediation NESHAP include other Federal agencies, state air regulatory agencies, trade associations, and private businesses.

The primary source of information was the industry and EPA data including an assessment by the Office of Air and Radiation. Information provided by the industry is retained in the EPA's AFS (Air Facility Subsystem) database which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. Approximately 286 respondents are currently subject to the regulation. The Agency estimates that there will not be any industry growth in the next three years.

It should be noted that the industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard when it was proposed and the standard was previously reviewed to determine the minimum information needed for compliance purposes. No major problems regarding the rule monitoring, recordkeeping, or reporting were identified during the public comment period.

A respondent consultation was conducted with Occidental Chemical Corporation (OCC), Frederick Fedri, (972) 404-2411. OCC has over 20 active manufacturing sites nationwide. OCC indicated that the applicability language in the standard provides clear direction and concise instructions for recordkeeping and reporting. OCC also said that less than eight hours were required on average to determine the applicability of the standard except at one plant site where 24 to 32 hours were required. The overall average burden is approximately nine hours. This correlates well with the data used in Table 1 (Respondents Burden) under "Initial Notification" and no changes are indicated. OCC also provide some partial data regarding the time for document preparation for "exempted sources" in Table 1. The ongoing/future paperwork burden for the 1 megagram/year exemption was estimated by OCC at 6 to 10 hours per discovery or event. The 1 megagram/year exemption would apply to a fraction of the affected sources. In addition in the case of typical "event or discovery," OCC estimates 18 to 24 hours for plant personnel to manage, document, communicate and coordinate the recordkeeping requirements for "exempted sources." These estimates do not include technical hours, so the overall number of hours for both types of exemptions is estimated at 22 to 28 hours per source. The number of hours used in Table 1 is 24 hours (managerial plus clerical), so the information provided by the respondent indicates that the data in Table 1 provides a reasonable estimate of burden. The respondent also said that the paperwork impact of the standard was moderate compared to other "Part 63" regulations.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards were collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease. If the relevant information were collected at less frequent intervals, the EPA would not be reasonably assured that an affected facility owner or operator is in compliance with the standards.

3(e) General Guidelines

These reporting and recordkeeping requirements do not violate any of the regulations established by OMB under 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined to be non-confidential. However, all information submitted to the Agency for which a claim of confidentiality is made is 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 28, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contains sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

Unlike a specific industry sector or type of business, the respondents potentially affected by this ICR cannot be easily or definitively identified. Potentially, the site remediation NESHAP may be applicable to any type of business or facility at which a site remediation is conducted to clean up media contaminated with organic HAP, and the remediation activities performed and the magnitude of the cleanup meets the applicability criteria specified in the rule. A site remediation that is subject to this rule potentially may be conducted at any type of privately owned or government-owned facility at which contamination has occurred due to past events or current activities at the facility. Site remediations performed at sites where the facility has permanently closed, the owner has gone out of business, or the facility has been abandoned and there is no owner (in this latter case, a government agency takes responsibility for the cleanup) are not subject to this NESHAP in most cases.

The regulated sources under this NESHAP (i.e., the site remediation activities) are not the predominant activity, process, operation, or service conducted at the facility. A

comprehensive list of North American Industry Classification System (NAICS) codes cannot be compiled for the respondents who will potentially be regulated by this action due to the nature of activities regulated by the source category. The NAICS code indicates a primary product produced or service provided at the facility rather than the presence of a site remediation performed to support the predominant function of the facility. Some representative NAICS codes for facilities where site remediations have been, or are currently being, conducted at some (but not all) facilities under a given code include: 325211, 325192, 325188, 32411, 49311, 49319, 48611, 42269, and 42271. However, these codes are not necessarily comprehensive as to the types of facilities at which site remediations subject to the rule may be required in the future.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by the Site Remediation rule, 40 CFR part 63, subpart GGGGG, reporting and recordkeeping requirements.

A source must make the following reports:

Reports for 40 CFR part 63, subpart GGGGG			
Requirement	40 CFR part 63 subpart GGGGG Citation	40 CFR part 63 subpart A Citation	Retention Time
Notifications and Reports			
Initial notification	63.7950(a), (c)	63.9(b)	
Notification of performance tests	63.7950(a), (d)	63.7, 63.9(e)	
Notification of compliance status	63.7950(a), (e)	63.9(h)	
Performance test results	63.7950(a), (e)	63.10(d)(2)	
Semiannual compliance reports	63.7951(a), (b)	63.10(e)	
Startup, shutdown, malfunction reports	63.7951(a), (b), (c)	63.10(d)(5)	

A source must maintain the following records:

Recordkeeping for 40 CFR part 63, subpart GGGGG			
Requirement	40 CFR part 63 subpart GGGGG Citation	40 CFR part 63 subpart A Citation	Retention Time
Copies of each notification and report submitted to comply with subpart as listed above	63.7952(a)(1)		5 years
Records of performance tests	63.7952(a)(3)	63.10(b)(2)	5 years

Recordkeeping for 40 CFR part 63, subpart GGGGG			
Records of initial and subsequent determinations for affected sources exempted from control requirements	63.7952(a)(4)	63.10(b)(2)	5 years
Records of control device operating parameter continuous monitoring system (CMS) deviations, calibrations, and maintenance	63.7952(b)	63.10(b)(2)	5 years
Records of air pollution equipment inspections and repairs as required by rule	63.7952(c)	63.10(b)(2)	5 years

Respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site. Respondents will submit hard copy reports. To minimize the burden, much of the information the EPA needs to determine compliance will be recorded and retained on-site at the facility.

(ii) Respondent Activities

Respondent Activities
Install, calibrate, maintain, operate continuous monitoring system for VOHAP
Perform initial performance test
Write the notification and reports listed above
Enter information required to be recorded above
Submit the required reports developing, acquiring, installing, and using 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
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information
Train personnel to respond to a collection information
Transmit, or otherwise disclose the information

Respondents typically use monitoring equipment that automatically records parameter data and the personnel at the affected facilities evaluate the data manually. In addition, respondents do not typically submit reports electronically but send hardcopies the regulating authority. Therefore, the percent of reports submitted is zero (0%). To minimize the burden, much of the information the EPA needs to determine compliance is recorded and retained on-site at the facility.

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

5(a) Agency Activities

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

Agency Activities
Review initial notification
Review performance test notification
Conduct initial compliance determination
Review performance test reports
Review semiannual summary reports and any SSM reports
Audit facility records
Input, analyze, and maintain data in the Air facility Subsystem (AFS) data base

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to determine source's ability to comply with the emission standard. Data obtained from records maintained by the respondents during site inspection visits by Agency personnel are tabulated and published for internal EPA use in enforcement and compliance program. The semiannual reports are used to determine source's compliance.

Information from the reports is entered into the AFS. AFS is EPA's database, operated and maintained by EPA's Office of Compliance, for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 125,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be maintained for at least five years.

5(c) Small Entity Flexibility

The rule places no requirement on any facility to initiate site remediation activities. The EPA anticipates that parties that undertake site remediation generally do so voluntarily and that the impact of this rule on those parties will not be significant. Further, because states and other parties decide whether to undertake site remediation activities, predicting how many, or what types of small entities will undertake such activities, is extremely difficult, if not impossible. Nonetheless, the rule is structured to avoid impacts on small businesses. The rule specifically excludes from its scope remediations conducted at gasoline stations, farm sites, and residential sites. Moreover, the rule applies only to remediation sites located at a facility that is a major source under the CAA and at which is collocated one or more non-remediation activities listed as a MACT major source category [pursuant to CAA section 112(c)]. Such sources tend to be large businesses. The rule also contains applicability emission thresholds that are likely to exclude many site remediations conducted at small businesses. For example, the rule exempts sources where the total annual quantity of HAP contained in all extracted remediation material at the

facility is less than 1 megagram per year. For these reasons, the rule does not impose a significant burden on a substantial number of small entities.

5(d) Collection Schedule

The frequency of each information collection activity is shown in Table 1, NESHAP Site Remediation (40 CFR part 63, subpart GGGGG) Respondent Burden and Cost.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computations of annual burdens for the recordkeeping and reporting requirements applicable to the industry under 40 CFR part 63, subpart GGGGG. The individual burdens have standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions are 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 information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry for the recordkeeping and reporting requirements is estimated to be 125,027 hours (Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the program, and the previously approved ICR.

Estimating the number of respondents for the site remediation NESHAP is more difficult than the other source categories for which the EPA establishes NESHAP because of a unique set of considerations. As discussed earlier in Section 4(a), site remediations cannot be categorized by a particular industry sector or group of industry sectors. Another consideration is the finite period for which a site remediation is conducted. The objective of a site remediation is to mitigate a detected risk to public health or the environment by successfully completing the cleanup of the area contaminated by a hazardous substance. For NESHAP source categories associated with industrial processes or product distribution, a facility and its air emission sources typically remain in operation for many years. When an existing source reaches the end of its useful service life, it is often reconstructed or replaced with a new source. In contrast, the air emission sources associated with site remediations cease to exist once the remediation cleanup criteria are achieved. Depending on site-specific facts such as the extent of the contamination and the type of remediation activities needed, the “life span” of a given site remediation may be a short period lasting several weeks to a more extended period lasting several years. Even for those site remediations requiring a number of years to complete, it is important to recognize that ultimately, the remediation activities at a facility will be completed and the air emission sources will no longer exist. Thus, at any given time, the number of respondents will be changing since at some facilities the site remediations are completed (i.e., subtracting respondents from the total number), at other facilities the site remediations are still on-going, and at some new facilities site remediations are beginning (i.e., adding respondents to the total number).

The annual burden estimates for reporting and recordkeeping presented in Table 1 are based on an estimated total of 286 respondents. The respondent numbers used for the estimates were derived from data used by EPA for estimating the nationwide emission reduction and cost impacts of the final rule. For this total number of respondents, 26 respondents are estimated to use an in-situ treatment process. At each of these sites, a control device is assumed to be required on the process vent. The other 260 respondents are assumed to use an on-site ex-situ treatment process. The vast majority of these sites use tanks for storage and handling of contaminated media. Although a rare practice at existing sites, and not likely to be used at future sites, use of surface impoundments at the ex-situ treatment sites is included in the burden estimates by assuming that five of the 260 sites use a surface impoundment in place of tanks. Finally, the organic content of the contaminated media extracted at most of the ex-situ treatment sites will be below the 10 percent threshold level specified in the final rule for implementation of a leak detection and repair (LDAR) program. For the burden estimates, it is assumed that 10 facilities will need to implement a LDAR program. Other assumptions are that 10 percent of the respondents operating ex-situ treatment sites (26 respondents) choose to exempt one source at the site from the air emission control requirements according to the rule requirements, and an additional unit, an oil/water separator, is used at five of the sites.

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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

The average hourly respondent costs (labor plus overhead) used for the burden estimates are: \$100.99/hr for managerial staff, \$87.97/hr for technical staff, and \$43.81/hr for clerical staff.

These rates come from United States Department of Labor, Bureau of Labor Statistics, December 2005, "Table 2. Civilian Workers, by occupational and industry group." The rates are in column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

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

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

(iii) Capital/Startup vs. Operation and maintenance Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
A Monitoring Equipment	B Startup Cost for One Affected Facility	C Number of New Affected facilities to Startup	D Total Startup Costs (BxC)	E Annual O&M Costs for One Affected Facility	F Number of Affected Facilities with O&M	G Total O&M (ExF)
Parametric system	\$10,000	0	0	\$2,000	\$286	\$572,000
Leak detection	\$1,500	0	0	\$1,000	\$10	\$10,000
Total						\$582,000

There are no capital/startup costs for this ICR. The total operation and maintenance (O&M) costs for this ICR are \$582,000.

6(c) Estimating Agency Burden and Cost

The only costs that the Federal government will incur are the costs associated with the analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of the collected information. Estimates for these costs are presented in Table 2.

The average annual Agency cost during the three years of the ICR is estimated to be \$259,688. The total Agency labor hours are 5,720 per year.

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

Managerial \$57.20 (GS-13, Step 5, \$35.75 x 1.6)

Technical \$42.45 (GS-12, Step 1, \$26.53 x 1.6)

Clerical \$22.96 (GS-6, Step 3, \$14.35 x 1.6)

These rates come from the OMB "2006 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2. NESHAP Site Remediation (40 CFR Part 63, Subpart GGGG), Agency Burden and Cost.

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

There are a total of 286 respondents and no new respondents are envisioned in the next three years. The respondent burden hours and costs are presented in Table 1. The total burden hours are calculated by adding the total labor-hours per year estimated for technical, managerial, and clerical staff. The annual hourly burden for all 286 respondents is 125,027, and the labor cost is \$10,824,653.

Respondent Universe and Total Burden and Cost
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Regulation Citation	A Average Number of New Respondents Per Year	B Number of Reports for New Sources	C Number of Existing Respondents	D Number of Reports for Existing Sources	E Number of Respondents That Keep Records but Do Not Submit Reports	F Total Annual Responses (AxB)+(CxD)+E
Semiannual reports	0	0	286	2	0	572
SSM reports when not in compliance with the SSM Plan	0	0	0	0	0	0

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively.

(i) Respondents Tally

The total annual labor costs are \$10,824,653. Details regarding this estimate might be found in Table 1. Annual respondent burden and cost for the NESHAP Site Remediation subpart GGGGG. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 218.6 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are 582,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 5,720 hours and \$259,688. See Table 2, NESHAP Site Remediation (40 CFR Part 63, Subpart GGGGG), Agency Burden and Cost.

6(f) Reasons for Change in Burden

There is a decrease in hours in the total estimated burden currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The change in estimate is due to the rule being in place for over three years and all initial activities completed on existing facilities, and a removal of compliance and enforcement-related activities. Other changes in burden from the most recently approved ICR include using the updated labor cost numbers, adding the overhead costs, correcting hours for several activities, and to sources transitioning from achieving compliance to maintaining compliance.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 219 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9.

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-2006-0445, which is available for online viewing at 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. 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-2006-0445 and OMB Control Number 2060-0534 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. NESHAP Site Remediation (40 CFR Part 63, Subpart GGGGG), Respondent Burden and Cost

Information Collection Activity	A Labor hours per Activity			B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Cost per Labor Category per Year (\$)			F Total Labor Cost per Year (\$)
	Mngmt	Technical	Clerical				Mngmt	Technical	Clerical	
1. Applications	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2. Surveys and Studies	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3. Parametric Monitoring System	4	40	0	1	0	0	0	0	0	0
4. Reporting requirements										
- Read instructions	8	16	0	1	0	0	0	0	0	0
- Conduct performance test	16	120	0	1	0	0	0	0	0	0
- Initial notification	8	0	2	1	0	0	0	0	0	0
- Performance test notification	2	0	1	1	0	0	0	0	0	0
- Initial compliance determination	8	40	8	1	0	0	0	0	0	0
- Performance test report	8	80	16	1	0	0	0	0	0	0
- Semiannual report	4	40	8	2	286	29,744	231,065	2,012,753.6	200,474.6	2,444,293.16
- SSM report	1	8	1	0	0	0	0	0	0	0
5. Recordkeeping requirements										
- Read instructions	8	40	0	1	0	0	0	0	0	0
- Plan activities	8	100	0	1	0	0	0	0	0	0
- Prepare SSM plan	16	80	8	1	0	0	0	0	0	0
- Prepare documentation for exempted sources	16	80	8	1	26	2,704	42,011.8	182,977.6	9,112.5	234,101.9

Information Collection Activity	A Labor hours per Activity			B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Cost per Labor Category per Year (\$)			F Total Labor Cost per Year (\$)
	Mngmt	Technical	Clerical				Mngmt	Technical	Clerical	
- In-situ process vents parametric monitoring	0	0.5	0	365	26	4,745	0	417,417.6	0	417,417.6
- Ex-situ process vents parametric monitoring	0	0.5	0	365	260	47,450	0	4,174,176.5	0	4,174,176.5
- Inspect tank covers	0	2	0	12	255	6,120	0	538,376.4	0	538,376.4
- Inspect container covers	0	0.5	0	12	260	1,560	0	137,233.2	0	137,233.2
- Inspect surface impoundment covers	0	2	0	12	5	120	0	10,556.4	0	10,556.4
- Inspect separator covers	0	2	0	12	5	120	0	10,556.4	0	10,556.4
- Inspect transfer system covers	0	0.5	0	12	260	1,560	0	137,233.2	0	137,233.2
- Leak detection and repair program	16	100	0	1	10	1,160	16,158.4	87,970.0	0	104,128.4
- Develop record system	16	100	8	1	0	0	0	0	0	0
- Enter information	0	2	0	52	286	29,744	0	2,616,579.7	0	2,616,579.7
- Personnel training	2	20	0	0	0	0	0	0	0	0
TOTAL						125,027				10,824,652.7

Assumptions

- 1) Cost: managerial - \$100.99/hr, technical - \$87.97/hr, clerical - \$43.81/hr.
- 2) 26 respondents are estimated to use an in-situ treatment process. At each of these sites, it is assumed that a control device is required on the process vent.
- 3) 260 respondents are assumed to use an on-site ex-situ treatment process.
- 4) 5 of the 260 sites use a surface impoundment in place of tanks.
- 5) 10 facilities implement a LDAR program.

- 6) 26 respondents exempt one source at the site from the air emission control requirements.
- 7) Oil/water separator is used at five of the sites.
- 8) Previous ICR allowed two SSM reports per year, but we determined that these reports are typically included in the semiannual reports.

Table 2. NESHAP Site Remediation (40 CFR Part 63, Subpart GGGGG), Agency Burden and Cost

Information Collection Activity	A Labor Hours per Activity per Labor Category			B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Cost per Labor Category (\$)			F Total Labor Costs per Year (\$)
	Managerial	Technical	Clerical				Managerial	Technical	Clerical	
Report Review										
a. Initial notification	1	4	0	0	0	0	0	0	0	0
b. Performance test notification	1	2	0	0	286	0	0	0	0	0
c. Initial compliance determination	4	24	0	0	0	0	0	0	0	
d. Performance test reports	4	24	0	0	286	0	0	0	0	0
e. Semiannual report	2	8	0	2	286	5,720	65,436.8	194,251.2	0	259,688
TOTAL						5,720				259,688

Assumptions:

- 1) Managerial labor - \$57.20, technical labor-\$42.45,clerical labor-\$22.96.