

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for VOC Emissions from Petroleum Refinery Wastewater System

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for VOC Emissions from Petroleum Refinery Wastewater System (40 CFR part 60, subpart QQQ) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for volatile organic compound (VOC) emissions from petroleum refinery wastewater systems for the regulations published at 40 CFR 60.690 were proposed on May 4, 1987 and promulgated on November 23, 1988. These standards apply to the following affected facilities in petroleum refinery wastewater systems: individual drain systems, oil-water separators, and aggregate facilities commencing construction, modification or reconstruction after the date of proposal. An individual drain system consists of all process drains connected to the first downstream junction box. An oil-water separator is the wastewater treatment equipment used to separate oil from water. An aggregate facility is an individual drain system together with ancillary downstream sewer lines and oil-water separators, down to and including the secondary oil-water separator, as applicable. Aggregate facilities are intended to capture any potential VOC emissions within the petroleum refinery wastewater system during expansions of and additions to the system. There are no additional recordkeeping or reporting requirements for aggregate facilities. For the purposes of this document, new facilities are those affected facilities that have had construction, modification or reconstruction within the last three years. This information is being collected to determine compliance with 40 CFR part 60, subpart QQQ.

In general, all NSPS standards 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 at least two years 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 135 facilities per year will be subject to the standard, and it is estimated that no additional sources per year will become subject to the standard in the next three years.

There are approximately 135 VOC emissions from petroleum refinery wastewater systems in the United States, which are all publicly owned and operated by the petroleum refinery wastewater system industry. None of the 135 facilities in the United States are owned by either state, local, tribal or the Federal Government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NSPS for VOC Emissions from Petroleum Refinery Wastewater System (40 CFR part 60, subpart QQQ). The Federal government burden does not include work performed by Federal employees only work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NSPS for VOC Emissions from Petroleum Refinery Wastewater System (40 CFR part 60, subpart QQQ).

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

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, VOC emissions from petroleum refinery wastewater systems cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart QQQ.

2(b) Practical Utility/Users of the Data

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

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

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart QQQ.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their 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. 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 (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 135 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

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 was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are source category description. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2911, which corresponds to the North American Industry Classification System (NAICS) 324110 for source category description. The respondents to the recordkeeping and reporting requirements are petroleum refineries.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by the New Source Performance Standards for VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ).

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	60.7(a)(1)
Notification of modification	60.7(a)(4)
Notification of actual startup date	60.7(a)(3)
Notification of initial performance test	60.8(a)
Notification of election to construct and operate a completely closed drain system	60.693-1(c) and 60.698(a)
Notification of election to construct and operate a floating roof on an oil-water separator tank or other subject auxiliary equipment	60.693-2(b) and 60.698(a)
Notification of intent to use an alternative means of emission limitation	60.694(c)
Notification of intent to use a VOC control device other than a carbon absorber to meet the requirement of 60.692-5(a), with information describing the control device and the process parameters being monitored	60.695(b)
Demonstration that an alternative operational or process parameter will ensure that the control device is operated in compliance with standards	60.695(c)

Notifications	
Initial certification that the requirements for equipment and inspections have been met	60.698(b)(1)
Notification of delay in compliance along with the date of the next scheduled refinery or process unit shutdown and reasons why delay is necessary	60.698(e)
Semiannual reports of excess emissions from and performance of continuous monitoring systems, and/or summary report forms	60.7(c) and 60.7(d)
Semiannual certification and required inspections have been carried out	60.698(b)(1)
Initial performance test data and result for flares	60.8(a) and 60.698(b)(2)
Initial and semiannual inspection reports detailing problems resulting in VOC emissions and the corrective actions taken	60.698(c)
Semiannual reporting on control device performance	60.698(d)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions of affected facilities; malfunctions of control devices; and periods where the continuous monitoring system is inoperative	60.7(b)
Maintain records of measurements, performance evaluations, calibration checks, adjustments and maintenance related to continuous monitoring systems	60.7(f)
Maintain records of location, date, and corrective actions for process drains not in compliance	60.697(b)(1)
Maintain records of location, date, and corrective actions for junction boxes out of compliance	60.697(b)(2)
Maintain records of location, date, and corrective actions for sewer lines out of compliance	60.697(b)(3)
Maintain records of location, date, and corrective actions for oil-water separators out of compliance	60.697(c)
Maintain records of location, date and corrective actions for closed vent systems and completely closed drain systems out of compliance	60.697(d)
Maintain records of expected date of repairs if emission point cannot be repaired without a process shutdown; reason for delay; signature of company official who authorizes the delay; and the date of actual repairs	60.697(e)
Maintain records of copy of design specifications for all equipment used to comply with the standards	60.697(f)(1) and (2)

Recordkeeping	
Maintain records of information pertaining to the operation and maintenance of closed-drain systems and closed-vent systems	60.697(f)(3)
Maintain records of location, plans or specifications for inactive process drains	60.697(g)
Maintain records of location, plans or specifications for exempted storm water sewer systems	60.697(h)
Maintain records of location, plans or specification for exempted ancillary equipment	60.697(i)
Maintain records of location, plans or specifications for exempted non-contact cooling water systems.	60.697(j)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a continuous temperature monitoring device for thermal or catalytic incinerators; a continuous VOC monitoring device for regenerative carbon absorbers; and/or a thermocouple or equivalent device for flares, as applicable.
Perform initial performance test, Reference Method 21 test (Method 22 for flares), and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
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.
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.

Respondent Activities
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is an EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS 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 retained by the owner or operator for two years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses,) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden, NSPS for VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever 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 average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 9,237 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$105.86 (\$50.41 + 110%)
Technical	\$92.61 (\$44.10 + 110%)
Clerical	\$45.32 (\$21.58 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, Table 2. Civilian Workers, by occupational and industry group. The rates are from 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. The type of industry costs associated with the information collection activities in the subject standard 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 monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Portable VOC analyzer for non-regenerative carbon absorber	\$2,960	0	0	\$130	135	\$17,550

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$17,550. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$17,550.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$104,576.

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

Managerial	\$58.18 (GS-13, Step 5, \$36.36 + 60%)
Technical	\$43.17 (GS-12, Step 1, \$26.98 + 60%)
Clerical	\$23.36 (GS-6, Step 3, \$14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NSPS for VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ), below.

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

Based on our research for this ICR, on average over the next three years, approximately 135 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below is 135 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	135	0	0	135
2	0	135	0	0	135
3	0	135	0	0	135
Average	0	135	0	0	135

¹ New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 135.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C) + D$
Notification of construction/reconstruction	0	1	n/a	0
Notification of modification	0	1	n/a	0
Notification of actual startup	0	1	n/a	0
Initial certification of equipment and inspections	0	1	n/a	0
Initial inspection report detailing emission problems	0	1	n/a	0
Notifications of various intent	0	1	n/a	0
Demonstration for alternative operational or process parameter	0	1	n/a	0
Notification of delay in compliance	0	1	n/a	0
Semiannual report	135	2	n/a	270
Notification of initial performance test	0	1	n/a	0
			Total	270

The number of total respondents is 135

The number of Total Annual Responses is 270. This is the number in column E of the Respondent Universe and Number of Responses per year in table above.

The total annual labor costs are \$822,810. Details regarding these estimates may be found in Table 1: Annual Industry Burden, NSPS for VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ), below.

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 shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$822,810. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 34 hours per response.

The total annual capital/startup and O&M cost to the regulated entity are \$17,550.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 2,484 labor hours at a cost of \$104,576. See Table 2. Annual Agency Burden and Cost: NSPS for VOC Emissions from Petroleum Refinery Wastewater Systems (40 CFR part 60, subpart QQQ), below.

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall labor hours.

There is however, a change in the cost estimate. The previous ICR used a cost figure that was rounded-up (\$18,000). This ICR uses the exact cost figure (\$17,550) resulting in a small cost decrease.

Since there are no changes in the regulatory requirements and there is not significant industry growth, the labor hours in the previous ICR are used in this ICR and there is no change in the labor hours to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 34 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 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-2007-0044. An electronic version of the public docket is available at <http://www.regulations.gov> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket,

and to access those documents in the public docket that are available electronically. When in the system, select “search” than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0044 and OMB Control Number 2060-0172 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: Annual Respondent Burden and Cost – NSPS for VOC Emissions from Petroleum Refinery Wastewater System (40 CFR part 60, subpart QQQ)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost {\$} (b)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	2	1	2	135	270	13.5	27	\$27,657.45
B. Required activities								
1. Inspect drain systems	2	12	24	135	3,240	162	324	\$331,889.40
2. Inspect oil-water separators	8	2	16	135	2,160	108	216	\$221,259.60
3. Performance test	330	1	330	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of modification	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Initial certification of equipment and inspections	2	1	2	0	0	0	0	\$0
Initial inspection report detailing emission problems	2	1	2	0	0	0	0	\$0
Various notifications of intent	2	1	2	0	0	0	0	\$0
Demonstration for alternative operational or process parameter	2	1	2	0	0	0	0	\$0
Notification of delay in compliance	2	1	2	0	0	0	0	\$0
Semiannual report	8	2	16	135	2,160	108	216	\$221,259.60
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Results of performance test	See 3B							

4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Enter information	1.5	1	1.5	135	202.5	10.13	20.25	\$0
F. Train personnel	N/A							
G. Audits	N/A							
Subtotal					8,032.5	401.63	803.25	\$822,809.67
TOTAL ANNUAL BURDEN AND COST (rounded)						9,237		\$822,810

Assumptions:

- ^a. We have assumed that the average number of respondents that will be subject to the rule will be 135. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.
- ^b. This ICR uses the following labor rates: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, "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.
- ^c. We have assumed that each respondent will read instructions once per year.
- ^d. We have assumed that each respondent will take two hours to inspect drain systems twelve time per year.
- ^e. We have assumed that it will take eight hours for each respondent to inspect oil-water separators two time per year.
- ^f. We have assumed that each respondent will take eight hours to write the semiannual report two time per year.

Table 2: Average Annual EPA Burden – NSPS VOC Emissions from Petroleum Refinery Wastewater System (40 CFR part 60,

subpart QQQ)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost {\$} (b)
Report Review								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of modification	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Initial certification for equipment and inspections	2	1	2	0	0	0	0	\$0
Initial inspection detailing emission Problems	2	1	2	0	0	0	0	\$0
Notification of various intent ^c	2	1	2	0	0	0	0	\$0
Demonstration for alternative operational or process parameter	2	1	2	0	0	0	0	\$0
Notification of delay in compliance	2	1	2	0	0	0	0	\$0
Notification of initial performance Test	2	1	2	0	0	0	0	\$0
Initial performance test report for Flares	2	1	2	0	0	0	0	\$0
Review of semiannual reports ^d	8	2	16	135	2,160	108	216	
Subtotal					2,160	108	216	\$104,576.40
TOTAL ANNUAL BURDEN AND COST (rounded)					2,484			\$104,576

Assumptions:

^a. We have assumed that the average number of respondents that will be subject to the rule will be 135. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

^b. The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$58.18 (GS-13, Step 5, \$36.36x1.6), Technical rate of \$43.17 (GS-12, Step 1, \$26.96 x 1.6), and Clerical rate of \$23.36 (GS-6, Step 3, \$14.60 x 1.6). These rates are from the Office of Personnel Management (OPM) "2007 General Schedule" which excludes locality rates of pay.

^c. The following notification review is included: election to construct and operate a completely closed drain system; election to construct and operate a floating

roof; intent to use an alternative means of emission limitation; and intent to use a VOC control device other than a carbon absorber to meet the requirements of 60.692-5(a).

^d We have assumed that it will take 8 hours two times per year to review each semiannual report.