

**SUPPORTING STATEMENT  
FOR  
NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and  
Pipeline Facilities; and Gasoline Dispensing Facilities (40 CFR  
part 63, subparts BBBBBB and CCCCCC)(Final Rule)**

**1. Identification of the Information Collection**

*(a) Identification of the Information Collection*

“NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities; and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC).” This is a new information collection request (ICR) that has been assigned Environmental Protection Agency (EPA) ICR number 2237.02 and Office of Management and Budget (OMB) Control Number 2060-NEW.

*(b) Short Characterization*

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

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

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

We estimate that the number of potentially affected sources under this rule may be as high as 350,000, with the gasoline dispensing facility segment alone accounting for about 340,000 of these facilities. However, a large percentage of these facilities are already complying with this rule as a result of their compliance with applicable State and local rules. We have minimized or eliminated the reporting and recordkeeping requirements under this rule for most of those sources. Therefore, the total estimated number of affected sources expected to incur reporting and recordkeeping costs under this rule is about 19,120. Also, there are no new or reconstructed facilities expected within the larger, bulk segment of the industry and new gasoline dispensing facilities are expected to be subject to State and local rules. Thus, we have developed this ICR with the expectation that only existing sources will be subject to the reporting and recordkeeping requirements of the rule. We have, however, included a description of the notifications that would be required if new affected sources are constructed.

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

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

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

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

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

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

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

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

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

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

fitting defects are repaired on a timely basis, (3) ensure that emission control devices are being properly operated and maintained, and (4) ensure that emissions due to leakage (both liquid and vapor) from cargo tanks and process piping equipment components during transfer are being minimized.

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

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

#### *(a) Non-duplication*

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

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

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

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

#### *(c) Consultations*

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

Table 1 contains the names, affiliations, and phone numbers of stakeholders involved in the rulemaking effort. These stakeholders were consulted during all phases of this NESHAP development.

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

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

*(d) Effects of Less Frequent Collection*

The reporting requirements for facilities subject to the NESHAP consist of certain one-time reports and a minimal amount of

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

*(e) General Guidelines*

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

*(f) Confidentiality*

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

*(g) Sensitive Questions*

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

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

*(a) Respondents/NAICS Codes*

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

**Table 2. Affected Industry Segments and their Industry Classifications**

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

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

*(b) Information Requested*

(i) Data items, including recordkeeping requirements

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

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

has been provided for industry use.

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



if the owner or operator cannot comply with the standard by the designated date [§63.9(c)].

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

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

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

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

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

### *(a) Agency Activities*

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

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

*(b) Collection Methodology and Management*

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

Information contained in these reports is entered into the Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS) which is operated and maintained by the EPA's Office of Air Quality Planning and Standards. The AFS is the EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. The EPA uses AFS for tracking air pollution compliance and enforcement by local and State regulatory agencies, and EPA Regional Offices and Headquarters. The EPA can edit, store, retrieve, and analyze the data via PC terminals.

*(c) Small Entity Flexibility*

Even though the recordkeeping requirements are the same for small and large businesses, the Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses. Construction, modification, and reconstruction reports take very little time to complete and are filed only once. Equipment leak monitoring and storage tank

inspection records are brief, and cargo tank vapor tightness documentation will be supplied primarily by independent cargo tank operators and kept at the gasoline distribution facility for each cargo tank and railcar that is to be loaded at the facility.

*(d) Collection Schedule*

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

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

Tables 3 and 4 document the computation of individual burdens for each of the recordkeeping and reporting requirements applicable to the respondents complying with this standard. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

*(a) Estimating Respondent Burden*

The average annual burden for gasoline distribution facilities over the next 3 years is estimated at 129,723 person-hours, as indicated in Table 4. These hours are based on Agency studies and background documents from the development of the standards or test methods, and Agency knowledge and experience with the NESHAP program.

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

*(b) Estimating Respondent Costs*

*(i) Estimating labor costs*

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

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

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

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

No capital costs were included in the estimated monitoring, reporting, and recordkeeping costs because the types of monitors that are required by the rule (operating parameter monitors for vapor processors) are typically included as a standard component of the control device itself. The cost of operating and maintaining these monitors was estimated to be \$1,000 per year. Emissions testing costs were estimated for Method 18, Method 25A, and Method 27. Methods 18 and 25A will be used to measure emissions of HAP from control devices. The cost of Method 18 and 25A testing was provided by the emissions testing staff at MACTEC. Method 27 is used to test cargo tanks for vapor tightness (leakage). Based upon current information provided by industry, the cost of preparing for and performing a Method 27 test has been estimated to be \$395. The other monitoring activities required by the rule involve only labor costs.

*(c) Estimating Agency Burden and Cost*

The only Federal costs are user costs associated with analysis of the reported information. Publication and distribution of the information are part of the operation of the AFS. Examination of

records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program.

The annual Federal Government cost during the first 3 years of the ICR is estimated to be \$2,575,314, as shown in Table 6. Labor rates used in estimating the annual cost are as follows:

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

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

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

We estimate that the number of potentially affected sources under this rule may be as high as 350,000. However, the gasoline dispensing facility segment alone accounts for about 340,000 of these facilities. In addition, a large percentage of the total facilities in the gasoline distribution industry are already regulated by State and local rules that are as at least as stringent as this NESHAP. As a result of these facts, we have included provisions in the rule to allow those facilities that are complying with the requirements of State and local rules to minimize the burden of this NESHAP. For example, gasoline dispensing facilities that are located in States with submerged fill requirements will have no reporting or recordkeeping requirements under the NESHAP. Also, other types of facilities that are complying with the NESHAP by virtue of their compliance with State or local rules will be allowed to utilize performance tests and monitoring results performed as a condition of their State or local permit to satisfy the requirements of the NESHAP. Within the primary industry segments in the source category, it is estimated that the following numbers of affected area source facilities will incur a reporting or recordkeeping burden as a result of the NESHAP:

1,100	Bulk terminals
460	Pipeline breakout stations
1,800	Pipeline pumping stations
5,900	Bulk Plants
<u>9,860</u>	<u>Gasoline dispensing facilities</u>

19,120 Total facilities

*(e) Bottom Line Burden Hours and Costs Tables*

(i) Respondent tally

See Table 4.

(ii) The agency tally

See Table 6.

(iii) Variations in the annual bottom line

Not applicable as this is a new ICR.

*(f) Reasons for Change in Burden*

This action is to add two new rule subparts (subpart BBBB-- NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and Subpart CCCCC - - NESHAP for Gasoline Dispensing Facilities). Both subparts add new recordkeeping and reporting for affected sources, including preparing and submitting notices, preparing and submitting demonstrations and applications, reporting releases, gathering information, and preparing and submitting reports.

*(g) Burden Statement*

The annual public reporting and recordkeeping burden for this collection is estimated to average 10 hours per response. It should be noted that the burden for the smaller facilities (bulk plants and gasoline dispensing facilities), the average burden is significantly less than the overall average.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information;

and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2006-0406, which is available for public viewing at the Air and Radiation Docket, EPA/DC, EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. Use this website to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW., Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA Docket ID Number EPA-HQ-OAR-2006-0406 in any correspondence.

**Table 3.1 Annual Respondent Burden and Costs**

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year*	Total Hours per year	Technical Hours per Year @ \$64.96/hr	Manag Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
<b>3.1 Bulk Terminals</b>												
(a) Read and understand rule requirements	6	1		6	367	2,202	121,586	16,271	3,500	141,356		141,356
(b) Prepare Initial Notification	4	1		4	367	1,468	81,057	10,847	2,333	94,238		94,238
(c) Perform Initial Performance Test	175	1		175	-	-	-	-	-	-		-
(d) Prepare Notification of Compliance Status	4	1		4	367	1,468	81,057	10,847	2,333	94,238		94,238
(e) Operation and Maintenance of operating parameter monitoring system	8	12	1,000	96	110	10,560	583,081	78,028	16,785	677,894	110,000	787,894
(f) Perform annual storage tank inspection	12	1		12	550	6,600	364,426	48,767	10,491	423,684		423,684
(g) Perform equipment leak inspections	2	12		24	-	-	-	-	-	-		-
(h) Keep records of performance tests, storage tank and equipment leak inspections, and cargo tank vapor tightness documentation	0.75	12		9	733	6,597	364,260	48,745	10,486	423,491		423,491
(i) Submit semiannual compliance report	4	2		8	733	5,864	323,787	43,329	9,321	376,437		376,437
						34,759				2,231,337		2,341,337

**Notes for Table 3.1:**

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 1,100 affected sources (367) completed these activities during each of the first 3 year.
- Assumed that all bulk terminal loading racks with >250,000 gallons per day throughput (threshold for vapor processor control requirement) already have vapor processors and that all have been tested.
- Assumed that 10 % of bulk terminals (110) must install operating parameter monitoring systems.
- Assumed that 50 % of bulk terminals (550) must begin performing annual storage tank inspections and that all



are currently performing equipment leak inspections at least once per month.

**Table 3.2 Annual Respondent Burden and Costs**

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Hours per year	Technical Hours per Year @ \$64.96/hr	Manag Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
<b>3.2 Pipeline Breakout Stations</b>												
(a) Read and understand rule requirements	6	1		6	153	918	50,688	6,783	1,459	58,931		58,931
(b) Prepare Initial Notification	4	1		4	153	612	33,792	4,522	973	39,287		39,287
(c) Prepare Notification of Compliance Status	4	1		4	153	612	33,792	4,522	973	39,287		39,287
(d) Perform annual storage tank inspection	12	1		12	230	2,760	152,396	20,394	4,387	177,177		177,177
(e) Perform equipment leak inspections	2	12		24	-	-	-	-	-	-		-
(f) Keep records of storage tank and equipment leak inspections	0.50	12		6.0	306	1,836	101,377	13,566	2,918	117,861		117,861
(g) Submit semiannual compliance report	4	2		8	306	2,448	135,169	18,088	3,891	157,148		157,148
						9,186				589,691		589,691

**Notes for Table 3.2:**

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

**Table 3.3 Annual Respondent Burden and Costs**

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Hours per year	Technical Hours per Year @ \$64.96/hr	Manag Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
<b>3.3 Pipeline Pumping Stations</b>												
(a) Read and understand rule requirements	4	1		4	600	2,250	124,236	16,625	3,576	144,438		144,438
(b) Prepare Initial Notification	1	1		1	600	600	33,130	4,433	954	38,517		38,517
(c) Prepare Notification of Compliance Status	1	1		1	600	600	33,130	4,433	954	38,517		38,517
(d) Perform equipment leak inspections	1	12		6	-	-	-	-	-	-		-
(e) Keep records of equipment leak inspections	0.1	12		1.2	1,200	1,440	79,511	10,640	2,289	92,440		92,440
(f) Submit semiannual compliance report	0.25	2		1	1,200	600	33,130	4,433	954	38,517		38,517
						5,490				352,428		352,428

**Notes for Table 3.3:**

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 1,800 affected sources (600) completed these activities during each of the first 3 year.
- Assumed that all facilities currently inspect for leaks at least once per month.
- Assumed that, on an annual average basis, 2 percent of facilities (36) will be required to submit a semiannual compliance report because of delays in repairing equipment leaks.

**Table 3.4 Annual Respondent Burden and Costs**

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AXB)	Number of Respondents per Year	Total Hours per year	Technical Hours per Year @ \$64.96/hr	Manag. Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
<b>3.4 Bulk Plants</b>												
(a) Read and understand rule requirements (in States without submerged fill rules)	4	1		4	492	1,898	104,833	13,996	3,011	121,840		121,840
(b) Read and understand rule requirements (in States with submerged fill rules)	2	1		2	1,475	2,950	162,887	21,798	4,689	189,374		189,374
(c) Prepare Initial Notification	2	1		2	492	984	54,333	7,271	1,564	63,167		63,167
(d) Prepare Notification of Compliance Status	1	1		1	492	492	27,166	3,635	782	31,584		31,584
(e) Perform equipment leak inspections	0.25	12		3	-	-	-	-	-	-		-
(f) Keep records of equipment leak inspections	0.10	12		1.2	3,933	4,720	260,597	34,873	7,502	302,972		302,972
(g) Submit semiannual compliance report	1	2		2	118	236	13,031	1,744	375	15,150		15,150
						11,280				724,087		724,087

**Notes for Table 3.4:**

- Reading the rule, preparing Initial Notification, preparing Notification of Compliance Status are one-time activities. Assumed 1/3 of the 5,900 affected sources (1,967) completed these activities during each of the first 3 year (492 in States without bulk plant rules and 1,475 in States with rules).
- Assumed that all facilities currently inspect for equipment leaks at least once per month.
- Assumed that, on an annual average basis, 2 percent of facilities (118) will be required to submit a semiannual compliance report because of delays in repairing equipment leaks.

**Table 3.5 Annual Respondent Burden and Costs**

Burden Item	(A) Tech Hrs per Occurrence	(B) Number of Occurrences per Respondent per Year	O & M costs per year	(C) Technical Hours per Respondent (C=AxB)	Number of Respondents per Year	Total Hours per year	Technical Hours per Year @ \$64.96/hr	Manag Hours per Year @ \$73.89/hr	Clerical hours @ \$31.79/hr	Total Labor Cost per Year (\$)	Total O&M Costs per Year (\$)	Total Costs per Year (\$)
<b>3.5 Gasoline Dispensing Facilities</b>												
(a) Read and understand rule requirements (facilities not in compliance)	2	1		2	3,691	7,382	407,605	54,546	11,734	473,884		473,884
(b) Read and understand rule requirements (facilities >100k already in compliance)	0.5	1		0.50	28,447	14,224	785,365	105,097	22,608	913,070		913,070
(c) Read and understand rule requirements (facilities <100k already in compliance)	0.25	1		0.25	81,195	20,299	1,120,816	149,987	32,265	1,303,068		1,303,068
(d) vapor balance system testing	6	1		6	3,287	19,722	1,088,970	145,726	31,348	1,266,044		1,266,044
(e) Prepare Initial Notification	1	1		1	3,691	3,691	203,802	27,273	5,867	236,942		236,942
(f) Prepare Notification of Compliance Status	1	1		1	3,691	3,691	203,802	27,273	5,867	236,942		236,942
						69,008				4,429,950		4,429,950

**Notes for Table 3.5:**

- Assumed that 1/3 of the 340,000 GDFs will read the rule during each of the first 3 year.
- The 11,073 facilities ( $11,073/3 = 3,691$  each year) that are not already in compliance will require 2 hrs.
- The 85,340 facilities ( $85,340/3 = 28,447$  each year) subject to and already complying with the vapor balance requirement (more than 100,000 gallons per month (gpm) throughput) will require 0.5 hr.
- The 243,587 facilities ( $243,587/3 = 81,195$  each year) not subject to vapor balance requirement (less than 100,000 gpm throughput) will require 0.25 hrs.
- For the 243,587 facilities with throughputs of <100,000 gpm that are complying with a SLT submerged fill requirement, and for the 85,340 facilities with throughputs of >100,000 gpm that are complying with a SLT vapor balancing requirement, there are no other reporting or recordkeeping requirements.
- For the 11,073 facilities that are not currently in compliance (9,860 must vapor balance and 1,213 must add submerged fill), assumed that 1/3 ( $11,073/3 = 3,691$ ) will submit Initial Notification and Notification of Compliance Status during each of the first 3 years.

**Table 4. Total Estimated Respondent Burden and Cost Summary**

Average Number of Respondents per year over the First 3 Years	Average Number of Activities per Respondent	Total Annual Hours <sup>a</sup>	Average Hours per Facility per Year <sup>b</sup>	Total Labor Cost per Year <sup>c</sup>	Total Annual O&M Costs <sup>d</sup>	Total Annual Cost Over the First 3 Years <sup>e</sup>	Average Annual Cost per Facility Over the First 3 Years
9,863	10	129,723	13.2	\$8,327,493	\$110,000	\$8,437,493	\$855

**Notes for Table 4:**

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

**Table 5. Annual Federal Government Burden and Costs**

Burden Item	Number of Activities per Year	EPA Hours per Activity	Total EPA Hours for Item	Technical Hours per Year @ \$58.88/hr	Management Hours per Year @ \$82.76/hr	Clerical Hours per Year @ \$36.76/hr	EPA Cost per Year (\$/yr)
Review initial notifications	5,303	2	10,606	499,585	87,775	38,988	626,348
Review notification of performance testing	-	2	-	-	-	-	-
Review performance test results	-	8	-	-	-	-	-
Review notification of compliance status	5,303	2	10,606	499,585	87,775	38,988	626,348
Review of storage tank inspection reports	780	4	3,120	146,964	25,821	11,469	184,255
Review semiannual compliance reports	6,838	2	13,676	644,194	113,183	50,273	807,650
Review of other, non-routine reports	1,400	4	5,600	263,782	46,346	20,586	330,714
			43,608				2,575,314

**Notes for Table 5:**

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



**Table 6. Total Estimated Agency Burden and Cost Summary**

Number of Industry Respondents	Number of Agency Activities <sup>a</sup>	Average Annual Hours <sup>b</sup>	Average Hours per Industry Respondent	Total Annual Labor Cost <sup>b</sup>
6,778	10	43,608	6	\$2,575,314