

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Petroleum Refineries (40 CFR Part 60, Subpart J) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Petroleum Refineries (40 CFR Part 60, Subpart J) (Renewal), EPA ICR Number 1054.10, OMB Control Number 2060-0022

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Petroleum Refineries, published at 40 CFR part 60, subpart J, were proposed on June 11, 1973, and promulgated on March 8, 1974. These regulations apply to the following affected facilities in petroleum refineries: fluid catalytic cracking unit catalyst regenerators, fuel gas combustion devices, and Claus sulfur recovery plants of more than 20 long tons per day commencing construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart J.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NSPS. Reporting frequency was changed from quarterly to semiannual on February 12, 1999 (64 FR 7465). Also it is estimated that 5% of respondents to this ICR will undergo construction or reconstruction. These changes are being reflected for the Agency for the first time for this ICR.

Any owner/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.

Approximately 132 respondents are currently subject to the regulation, and it is estimated that no additional respondents will become subject to the regulation in the next three years. These estimates are based on estimates from the most recently approved Information Collection Request (ICR) renewal. EPA estimates that the annual cost of this information collection will be \$541,464 for non-labor and \$1,140,989 for labor, based on a labor burden of 14,134 hours, for a total annual cost of \$1,682,453.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (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/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, particulate matter, carbon monoxide, and sulfur oxides emissions from petroleum refineries cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart J.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

The notifications required in the standards 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 check if the pollution control devices are properly installed and operated, and the standards are being met. The performance test may also be observed.

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

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

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

3(a) Non-duplication

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 its own similar standards to implement the federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the federal standards. 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

After reviewing our internal data sources and industry experts, we have determined that additional consultations with industry are inappropriate for this ICR renewal. The standard was developed with the participation and/or consultation with industry representatives. In addition, the Agency has performed additional reviews to determine additional burden reduction opportunities. The Agency currently collects the minimum amount of information necessary to ensure compliance with the standard. EPA searched its Online Tracking Information System (OTIS) database and examined industry data from the Oil & Gas Journal for information on the number of existing respondents.

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. In this

case, no comments were received.

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 likelihood of detecting poor operation and maintenance of control equipment and non-compliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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/NAICS and SIC Codes

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

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by the NSPS for Petroleum Refineries (40 CFR part 60, subpart J).

A source must make the following reports:

Notification Reports	
Notification of the actual date of initial startup, and notification of specific provisions for SO ₂ standards with which the source seeks to comply.	60.7(a)(3), 60.107(a)
Notification of performance test and of any relevant delays.	60.8(d)
Notification of the date of construction (or reconstruction).	60.7(a)(1)
Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies.	60.7(a)(4)
Notification of the date upon which demonstration of the continuous monitoring system performance commences.	60.7(a)(5)
Notification of the anticipated date for conducting the opacity observations, including, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test.	60.7(a)(6)
Notification that COMS will be used during a performance test in lieu of Method 9 observation data.	60.7(a)(7), 60.11(e)(5)
Request for exemption from the CO continuous monitoring system requirement.	60.105(a)(2)(ii)
Notification of change in semiannual report due to change in SO ₂ compliance method.	60.108(e)

Reports	
Results of performance tests including opacity observations and results.	60.8(a), 60.11(e)(2) through (e)(6), 60.13(c)
Semiannual reports.	60.107(c), (e), (f)
Reports of any periods for which SO ₂ or oxides emissions data are not available.	60.107(d)
Excess emissions and monitoring systems performance report and/or summary report (to be submitted with semiannual report).	60.7(c), 60.7(d), 60.105(e)

A source must maintain the following records:

Recordkeeping	
Records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	60.7(b)
Daily records of the average coke burn-off rate and hours of operation for any fluid catalytic cracking unit catalyst regenerator.	60.105(c)
Daily records of the rate of combustion of liquid or solid fossil-fuels and the hours of operation during which they are combusted in the incinerator-waste heat boiler (applies to fluid catalytic cracking unit catalyst regenerators that use incinerator-waste heat boilers).	60.105(d)
Records of all data and calibrations from continuous monitoring systems, including results of daily drift tests and quarterly accuracy assessments; measurements obtained by supplemental sampling for meeting minimum data requirements; and written procedures for the quality control program (if complying with 60.104(b)(1)).	60.107(b)(1)
Records of measurements obtained in the daily Method 8 testing, or those obtained by alternative measurement methods, if applicable (if complying with 60.104(b)(2)).	60.107(b)(2)
Records of data obtained from the daily feed sulfur tests (if complying with 60.104(b)(3)).	60.107(b)(3)
Records of each 7-day rolling average compliance determination.	60.107(b)(4)
Records of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices.	60.7(f)
Records of COMS results during initial performance test.	60.11(e)(4)

Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. At this time, it is estimated that approximately 70 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, CO, SO ₂ , and O ₂ .
Perform performance test, using the procedures listed in 40 CFR 60.106, and repeat performance tests if necessary.
Write the notifications 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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Continuous Monitoring System (CMS) information collection is automated and may be submitted electronically. In any event, hard copy reports from the CMS information may easily be generated from a computer.

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 performance tests and repeat performance tests if necessary.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and to 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 the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

A 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 requirements the minimum 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. In the Regulatory Impact Statement for the Proposed NSPS for Petroleum Refineries (Document ID: EPA-HQ-OAR-2007-0011.0109), 41 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 41 percent of the 132 facilities affected by this ICR, or 54 facilities, are small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal).

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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 14,134 hours (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 NSPS 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	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "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 type of industry costs associated with the information collection activities in the subject standards 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. It is anticipated that no new facilities will become subject to this regulation over the next 3 years. Therefore, there are no capital/startup costs

associated with this information collection. The annual Operation and Maintenance (O&M) costs are the ongoing costs to maintain the monitors 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) ¹ Continuous Monitoring Device	(B) ² Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) ³ Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Opacity	26,056	0	0	\$1,303	132	\$171,996
CO	8,848	0	0	\$885	132	\$116,820
SO ₂	13,028	0	0	\$1,303	132	\$171,996
O ₂	6,107	0	0	\$611	132	\$80,652
Total	\$54,039	0	0	\$4,102	132	\$541,464

¹ Each respondent is assumed to have at least one monitor for each parameter requiring monitoring under the standards.

² Monitor costs are based on the EPA Air Pollution Control Cost Manual. Costs have been time adjusted from 2000 to 2005 using the *Chemical Engineering* cost index for process instruments (<http://www.che.com/pindex/>).

³ O&M costs are based on monitor costs and the non-labor O&M factor provided in the EPA Air Pollution Control Cost Manual.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table. The total Operation and Maintenance (O&M) costs for this ICR are \$541,464. 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 \$541,464.

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 \$18,788.

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

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

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

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal).

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 132 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject over the next three years. The overall average number of respondents, as shown in the table below, is 132 per year.

The *Oil & Gas Journal* reported that there are 132 petroleum refineries (i.e., respondents) in the US in its 2004 Worldwide Refining Survey.¹ EPA also searched its OTIS database for sources that are within SIC code 2911 and are covered by the NSPS program. After excluding asphalt plants, which are also included in SIC code 2911, the OTIS database supports the *Oil & Gas Journal* data.

No new petroleum refineries have been built in the US since 1976.² In addition, the *Oil & Gas Journal's* "2001 Worldwide Refining Survey" reported that there were 143 petroleum refineries in the US, indicating a decline of 11 refineries since the last ICR.³ Therefore, EPA estimates that no additional respondents will become subject to the standards over the next three years, but 5% of the existing respondents will undergo reconstruction or redesign.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(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	7	132	0	7	132

1 2004 Worldwide Refining Survey. *Oil & Gas Journal*. December 20, 2004.

2 About Us: Louisiana Refining Division. Marathon Ashland Petroleum LLC. (<http://www.mapllc.com/about/garyville.html>)

3 "2001 Worldwide Refining Survey." *Oil & Gas Journal*. December 2001.

Number of Respondents					
2	7	132	0	7	132
3	7	132	0	7	132
Average	7	132	0	7	132

¹ For the purposes of this ICR, new respondents include only sources with constructed, reconstructed and modified affected facilities.

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 132. 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=(BxC)+D
Notification of construction/reconstruction	7	1	0	7
Notification of performance test	7	1	0	7
Report of performance test	7	1	0	7
Semiannual reports	132	2	0	264
			Total	285

The number of Total Annual Responses is 285. The total annual labor costs are \$1,140,989. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal).

The total annual capital/startup and O&M costs to the regulated entities are \$541,464. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 463 labor hours at a cost of \$18,788. See Table 2: Annual Agency Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal).

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 Hours Requested is 14,134. The total annual labor costs are \$1,140,989. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$541,464. 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 463 labor hours at a cost of \$18,788. See Table 2: Annual Agency Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal).

6(f) Reasons for Change in Burden

There is no change in burden from the most recently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 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-2008-0423. 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 contents of the 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 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 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0423 and OMB Control Number 2060-0022 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 Petroleum Refineries (40 CFR part 60, subpart J) (Renewal)

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Managemen t Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Applications	Not applicable							
2. Survey and Studies	Not applicable							
3. Reporting Requirements								
a. Read instructions ²	1	1	1	7	7	0.4	0.7	650
b. Required activities								
i. Performance tests								
A. Relative accuracy test ^{2,3}	146	1	146	7	51.1	2.6	5.1	4,744
B. CEMS audits (RAA or CGA) ^{2,3}	160	2	320	7	112	6	11.2	10,398
c. Create information	Included in 3.b.							
d. Gather existing information	Included in 3.e.							
e. Write reports								
i. Notification of construction/reconstruction ²	2	1	2	7	14	0.7	1.4	1,300
ii. Notification of performance test ²	2	1	2	7	14	0.7	1.4	1,300
iii. Report of performance test ²	2	1	2	7	14	0.7	1.4	1,300
iv. Semiannual emission reports	2	2	4	132	528	26.4	52.8	49,018
4. Recordkeeping Requirements								
a. Read instructions	Included in 3.a.							
b. Plan activities	Included in 3.b.							
c. Implement activities	Included in 3.b.							
d. Develop record system	Not applicable							

Table 1: Annual Respondent Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal)

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
e. Enter information								
i. Records of operating parameters ⁴	0.25	350	87.5	132	11,550	577.5	1,155	1,072,279
f. Train personnel	Not applicable							
g. Perform audits	Not applicable							
TOTAL LABOR BURDEN AND COST (rounded)					14,134			\$1,140,989

1. Cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x \$83.71) + (Management hours x \$97.46) + (Clerical hours x \$42.55)].

2. Assume 5 percent of the existing sources are requested by the regulatory agency to conduct a performance test [0.5 x 132 = 7].

3. Technical hours estimated to be 5 percent of the time that a CEMS is in operation [E = 0.05 x C x D].

4. Assume 350 operating days per year as specified in the NSPS review document.

Table 2: Annual Agency Burden and Cost, NSPS for Petroleum Refineries (40 CFR part 60, subpart J) (Renewal)

Activity	(A) Technical Hrs/ Occurrence	(B) Occurrences/ Respondent/ Yr.	(C) Hours/ Respondent/ Yr. [C=AxB]	(D) Number of Respondents	(E) Technical Hrs/Yr. [E=CxD]	(F) Management Hours/Yr. [F=0.05xE]	(G) Clerical Hours/Yr. [G=0.1xE]	(H) ¹ Total Labor Costs/Yr. (\$)
1. Review reports								
a. Notification of construction/reconstruction ²	0.5	1	0.5	7	3.5	0.2	0.4	163
b. Notification of performance test ²	0.5	1	0.5	7	3.5	0.2	0.4	163
b. Semiannual emission reports	1.5	2	3	132	396	19.8	39.6	18,462
TOTAL LABOR BURDEN AND COST (rounded)					463			\$18,788

1. This cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x \$41.57) + (Management hours x \$56.02) + (Clerical hours x \$22.50)].

2. Assume 5 percent of the existing sources are requested by the regulatory agency to conduct a performance test [0.5 x 132 = 7].