

## SUPPORTING STATEMENT

### NESHAP FOR PETROLEUM REFINERIES (Proposed Rule)

#### PART A

##### 1. Identification of the Information Collection

*(a) Title and Number of the Information Collection.*

“NESHAP for Petroleum Refineries (Proposed Rule)” This is a new information collection request (ICR) and the EPA tracking number is 2334.01.

*(b) Short Characterization.*

Respondents are owners or operators of existing or new petroleum refineries located in the United States and territories that are major sources of hazardous air pollutants (HAP). The current rule applies to miscellaneous process vents, storage vessels, wastewater streams, equipment leaks, gasoline loading racks, and marine vessel loading operations. The proposed amendments apply the requirements in 40 CFR Part 63, Subpart WW (National Emission Standards for Storage Vessels-Control Level 2) to all Group 1 storage tanks. The owner or operator of a Group 1 tank must comply with Subpart WW the next time the storage vessel is emptied and degassed or 10 years after promulgation of the amendments, which ever comes first. The final amendments also add provisions for the control of HAP emissions from cooling towers. Respondents must implement a monthly sampling program to detect and repair total strippable volatile organic compound (VOC) leaks from heat exchangers associated with cooling towers according to the Texas Commission on Environmental Quality’s “Air Stripping Method (Modified El Paso Method) for Determination of Volatile Organic Compound Emissions from Water Sources”. Exclusions are included for heat exchangers with low HAP content process fluids, high pressure cooling water, and heat exchangers subject to NPDES permit requirements. The owner or operator must repair any leak that is less than 6.25 parts per million by volume (ppmv) of total strippable VOC within 45 days. Provisions also are included the delay of repair leaks under specified conditions. Operation and maintenance requirements for the sampling equipment require one mid-point calibration prior to each sampling event. The proposed amendments include recordkeeping and reporting requirements to assure compliance with the

leak detection and repair program. The final amendments allow up to 3 years to comply with the requirements for cooling towers. The information collection requirements for the final proposed amendments are listed in Attachment 1. The remaining amendments clarify or correct provisions in the current rule and do not affect information collection requirements.

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

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

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for each category or subcategory of new and existing major and area sources of HAP that are listed for regulation under CAA section 112(c). These technology-based standards require the maximum emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts) and are commonly referred to as maximum achievable control technology (MACT) standards. The EPA is then required to review these technology-based standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years, under CAA section 112(d)(6). The second stage in standard setting focuses on reducing any remaining “residual” risk according to CAA section 112(f). CAA section 112(f)(2) requires EPA to determine for sources subject to certain section 112(d) standards whether the emission limitations protect the public health with an ample margin of safety. The proposed amendments revise the current NESHAP for petroleum refineries to address the risk remaining after application of the 1995 MACT standards and EPA’s 8-year review requirements for developments in practices, processes, and control technologies.

Certain records and reports are necessary for the Administrator to confirm the compliance status of major sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the Part 63 NESHAP General Provisions. Under the part 63 General Provisions, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

*(b) Use/Users of the Data.*

The information will be used by the delegated authority (State agency or Regional Administrator if there is no delegated State agency) to ensure that the emissions limits and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which plants, records, or processes may need inspection.

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

*(a) Nonduplication.*

A computer search of EPA’s ongoing ICRs revealed no duplication of information-gathering efforts.

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

This section is not applicable because this is a rule-related ICR.

*(c) Consultations.*

The amendments were developed in consultation with individual plants, State agencies, and trade associations. The non-EPA persons consulted on the information collection activities are identified in Table 1.

**TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES**

Contact	Organization	Telephone Number
John Wagner	American Petroleum Institute	(202) 682-8000
	Texas Commission on Environmental Quality	(512) 239-3900
David Friedman	National Petroleum Refiner’s Association	(202) 457-0480

*(d) Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) would not be reasonably assured that a plant is in compliance with the standards.

*(e) General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

*(f) Confidentiality.*

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

*(g) Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

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

*(a) Respondents/NAICS Codes.*

Respondents under Subpart CC are owners or operators of any existing or new petroleum refinery that is a major source of HAP emissions. The North American Industry Classification System (NAICS) code for petroleum refineries is 324110. We estimate that 153 existing refineries are subject to the current rule; one new refinery is projected during the 3 year period of this ICR.

*(b) Information Requested.*

*(i) Data Items, Including Recordkeeping Requirements.* Attachment 1, Source Data and Information Requirements, summarizes the data items, including recordkeeping and reporting requirements.

*(ii) Respondent Activities.* The respondent activities required by the proposed amendments are identified in Table 2 and are introduced in section 6(a).

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

*(a) Agency Activities.*

The Agency activities are provided in Tables 3 and are introduced in section 6(c).

*(b) Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The monitoring reports submitted to the permitting authority are used for problem identification, as a check on

source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the State agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (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.

*(c) Small Entity Flexibility.*

The Small Business Administration defines a small entity as a firm having no more than 1,500 employees. EPA's economic analysis shows that the proposed amendments will not have an adverse economic impact on a significant number of small or large entities. Based on our economic impact analysis, the amendments will result in a nationwide net annualized cost savings of about \$3.5 million due to a return of about \$6.6 million per year from reductions in product losses. Only three heavy oil refinery entities would incur net annualized costs as a result of the proposed amendments; all other refineries would have net savings. Two of the three refineries with net annualized costs are owned by a small parent entity. Net annualized costs for these two affected small refinery entities are well below 0.01 percent of their revenue; therefore, no adverse economic impacts are expected for any small entity. Thus, the costs associated with the proposed amendments will not result in any "significant" adverse economic impact for any small or large entity.

*(d) Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 2.

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

*(a) Estimating Respondent Burden.*

The annual burden estimates for the proposed amendments are shown in Table 2. Burden hour assumptions are based on experience with other standards, information from public comments on the proposed amendments, and data collected after proposal. Estimates of cost and

labor hours for cooling tower leak detection and repair program are based on Texas Commission on Environmental Quality cost analysis, details of which are included in the Response to Comments Document for the initial 2007 proposal.

*(b) Estimating Respondent Costs.*

The information collection activities for the proposed amendments are presented in Table 2. Because the data are already collected by respondents as required by the existing rule and permit requirements, no respondent development costs are associated with the information collection activities.

*(i) Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical mean hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, “May 2007 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 324100-Petroleum and Coal Products Manufacturing” available at [http://www.bls.gov/oes/current/naics4\\_324100.htm](http://www.bls.gov/oes/current/naics4_324100.htm). Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$54.42/hour for technical (Petroleum Engineer, Code 17-2171); \$24.60 for installation, maintenance and repair (Code 49-0000); \$20.60 for plant operator (Code 51-8099); \$60.88/hour for managerial (Engineering Manager, Code 11-9041), and \$17.91/hour for clerical (Office and Administrative Support, Code 43-0000). These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$114.28, installation, maintenance and repair at \$51.66; plant operator at \$43.26; management at \$127.85, and clerical at \$37.61.

*(ii) Estimating Capital and Operations and Maintenance (O&M) Costs.* The leak detection and repair program for cooling towers will require the purchase and installation of an air stripping column apparatus for sample collection and an FID analyzer to determine the concentration of air stripped compounds although samples may also be collected in canisters for shipment to analytical laboratories. The air stripping column is portable and may be used for multiple cooling towers.

(iii) *Capital/Startup vs. O&M Costs.* The capital costs of an air stripping column and equipment and an FID is \$88,000. The O&M costs are based on one mid-point calibration every month for 180 cooling towers per year. Capital/startup costs for existing and new sources are estimated at \$16,306,000 during the 3-year period of this ICR with O&M costs of \$61,711/yr.

(iv) *Annualizing Capital Costs.* The annualized cost associated with the final amendments during the 3-year period of this ICR is \$2,322,000 using capital discount rate of 7 percent.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government would incur are user costs associated with the analysis of the reported information, as presented in Table 3.

The Agency labor rates are from the Office of Personnel Management (OPM) 2008 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2008-GS available on the OPM website, [http://www.opm.gov/oca/08tables/html/gs\\_h.asp](http://www.opm.gov/oca/08tables/html/gs_h.asp). The government employee labor rates are \$14.96/hour for clerical (GS-6, Step 3), \$27.65 for technical (GS-12, Step 1), and \$37.27/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$23.94; technical at \$44.24, and management at \$59.63.

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

There are 153 existing petroleum refineries that are subject to the Subpart CC rule. One new refinery is expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 51.33 ( $154/3 = 51.33$ ).

The components of the total annual responses attributable to the proposed amendments are notifications of compliance status for cooling towers and storage vessels at new and existing refineries; notification of initial startup for storage vessels at one new refinery, notification of inspection for storage vessels at one new refinery, and semiannual compliance reports containing information on cooling towers and storage vessels for existing and new refineries. Therefore, the number of total annual responses is 205.92 (51.33 annual average respondents x 1 notification of compliance status for cooling towers, 51.33 annual average respondents x 1 notification of compliance status for storage vessels, 0.3 annual average respondent x 1 notification of initial startup for storage vessels, 0.3 annual average respondents x 1 notification of inspection for storage vessels, 51.33 annual average respondents x 2 semiannual compliance reports).

*(e) Bottom Line Burden Hours and Cost Tables.*

*(i) Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

The average annual burden for the monitoring, recordkeeping, and reporting requirements in the proposed amendments to Subpart CC for new and existing petroleum refineries is 13,714 person hours with an annual average cost of \$1,056,081 with annualized capital and O&M costs of \$2,322,000 and \$61,711, respectively. The total annual average burden for the final amendments will be \$3,439,792. These estimates do not include application of VOC recovery credits for the reduction in product losses that will occur as a result of the amendments.

*(ii) The Agency tally.* The total annual Federal Government cost is \$15,330 for 355.3 total annual hours. The bottom line Agency burden hours and costs presented in Table 3 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.



(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

EPA is under consent decree to issue results of technology review for the petroleum refineries source category as required by section 112(d)(6) of the Clean Air Act. The increase in burden results from amendments to the existing NESHAP (40 CFR part 63, Subpart CC) developed in response to technology review and residual risk review requirements of section 112(f).

(g) *Burden Statement*

The average annual respondent burden for the final amendments to the NESHAP for petroleum refineries is estimated to be 67 hours per response.

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

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions 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-2003-0146, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2003-0146 in any correspondence.

**PART B**

This section is not applicable because statistical methods are not used in data collection associated with the proposed amendments.

**TABLE 2. ANNUAL RESPONDENT BURDEN AND COST**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) No. of occurrences per respondent</b>	<b>(C) Person-hours per respondent (C=A*B)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person-hours per year (E=C*D)</b>	<b>(F) Installation, maintenance and repair person-hours per year (F=C*D)</b>	<b>(G) Plant operator person-hours per year (G=C*D)</b>	<b>(F) Management person-hours per year (E*0.05)</b>	<b>(G) Clerical person-hours per year (E*0.1)</b>	<b>(H) Cost<sup>b</sup>, \$</b>
1. Applications	N/A									
2. Surveys and Studies	N/A									
3. Acquisition, Installation, and Utilization of Technology and Systems <sup>c</sup>										
Technical	32	1.0	32	51.3	1,643					\$187,762
Management	2							103		\$13,125
4. Reporting Requirements										
A. Read instructions	2	1	2	51.3	103			5	10	\$12,774
B. Required activities										
Cooling tower monthly sampling/analysis <sup>d</sup>										
Technical	3.18	12.0	38	51.3	1,959					\$223,846
Plant operator	9.53	12.0	114	51.3			5,870			\$253,936
Triggered monitoring of cooling tower leak <sup>e</sup>	4	2	8	51.3	411					\$46,928
Technical	1	2	2	51.3	103					\$11,725
Plant operator	3	2	6	51.3			308			\$13,324
Cooling tower leak repair <sup>g</sup>	40	0.15	6	51.3		308				\$15,911
Storage vessel initial inspection <sup>g</sup>	10.7	1	10.7	0.3	3.21			0.16	0.32	\$399
Storage vessel annual inspection <sup>g</sup>	10.7	1	10.7	0.3	3.21			0.16	0.32	\$399
Storage vessel 10 year inspection <sup>g</sup>	N/A									
C. Create information	See 4B									
D. Gather existing information	See 4B									
E. Write report	See 4B									
Notification of compliance status – cooling towers <sup>h</sup>	1	1	1	51.3	51			2.6	5.1	\$6,383
Notification of compliance status – storage vessels <sup>h</sup>	1	1	1	51.3	51			2.6	5.1	\$6,387
Notification of initial startup – storage vessel <sup>g</sup>	1	1	1	0.3	0.3			0.02	0.03	\$37

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=C*D)	(F) Installation, maintenance and repair person-hours per year (F=C*D)	(G) Plant operator person-hours per year (G=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person-hours per year (E*0.1)	(H) Cost <sup>b</sup> , \$
Notification of inspection – storage vessels <sup>c</sup>	1	1	1	0.3	0.3			0.02	0.03	\$37
Annual inspection failure report – storage vessels <sup>c</sup>	N/A									
Semiannual report <sup>d</sup>	2	2	4	51.3	205			10.3	20.5	\$25,549
5. Recordkeeping Requirements										
A. Read instructions	See 4A									
B. Plan activities	See 4A									
C. Implement activities	See 4A									
D. Record data <sup>d</sup>										
Technical	1	12	12	51.3	616					\$70,392
Operator	1	12	12	51.3		616				\$26,646
E. Time to transmit or disclose information	1	2	2	51.3	103			5.1	10.3	\$12,774
F. Time to train personnel <sup>k</sup>	20	1	20	51.3	1,027			51.3	102.7	\$127,743
G. Time for audits	N/A									
<b>TOTAL LABOR BURDEN AND COST</b>						<b>13,714 labor hours/yr</b>				<b>\$1,056,081</b>
Annualized cost of capital			<b>\$2,322,000</b>							
Operation and maintenance (O&M) <sup>l</sup>			<b>\$61,711</b>							
<b>Total Annual Cost</b> (Labor + Annualized Capital + O&M)			<b>3,439,792</b>							

N/A = not applicable.

<sup>a</sup> There are 153 existing petroleum refineries that are subject to the Subpart CC rule. One new refinery is expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 51.33 (154÷3= 51.33).

<sup>b</sup> This ICR uses the following labor rates: technical at \$114.28; installation, maintenance, and repair at \$51.66; plant operator at \$43.26; management at \$127.85; and clerical at \$37.61. The rates from the United States Department of Labor, Bureau of Labor Statistics, “May 2007 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 324100-Petroleum and Coal Products Manufacturing” have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Planning costs for a single cooling tower based on 32 hours for engineer and 2 labor hours for management.

<sup>d</sup> EPA estimates that 486 of 540 cooling towers at 153 existing refineries will need to implement the new cooling tower monitoring requirements (3.17 towers per refinery) and one new refinery with 3.17 cooling towers will become subject to the Subpart CC rule during the 3-year clearance period of this ICR. Therefore, the annual average number of cooling towers per refinery is 3.18 (486 + 3.17 = 489 cooling towers/154 refineries). Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Labor costs for setup of portable air stripping column and

sampling/analysis for one cooling tower based on 1 labor hour for engineer and 3 labor hours for operator. Assume 3.18 towers per refinery and event occurs 12 times per year.

<sup>e</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Labor costs for additional sampling and analysis triggered by leak based on 1 hour for engineer and 3 labor hours for an operator for 1 event per year for 2 heat exchangers per refinery.

<sup>f</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Repair costs based on 40 labor hours for 1 repair event per year for 15 percent of heat exchangers.

<sup>g</sup> The current rule requirements apply to approximately 1,648 Group 1 storage vessels at 153 existing refineries (10.77 storage vessels per refiner). The initial, annual, and 10-yr inspection requirements, recordkeeping, and annual inspection failure report in the current rule are the same as the requirements in 40 CFR Part 63, Subpart WW and are already accounted for in the existing ICR for Subpart CC. Burden estimates are for one new refinery with average of 10.77 storage vessels that is expected during the 3 year period of this ICR.

<sup>h</sup> Assume each existing refinery must submit notification of compliance status for cooling towers and storage tanks. Assume 1 new refinery (0.33 respondents per year) must submit notification of initial startup and notification of inspection according to Subpart WW.

<sup>i</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Assume 2 hours per occurrence at 2 times per year.

<sup>j</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis. Assume 24 labor hours per month per refinery for recordkeeping requirements.

<sup>k</sup> Labor and costs based on estimates from Texas Commission on Environmental Quality for cooling tower sampling and monitoring program and EPA MACT floor cost analysis.

Assume training of 2 labor hours per year for 10 operators per facility.

<sup>l</sup> Operation and maintenance costs based on one mid-point calibration of sampling equipment prior to each sampling event (12 times/yr) at 0.25 hr by one engineer (\$114.28/yr) for annual average of 180 cooling towers (540 cooling towers/3 = 180).

**TABLE 3. ANNUAL BURDEN AND COST TO THE AGENCY**

<b>Burden Item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) Occurrences per respondent</b>	<b>(C) Plants per year<sup>a</sup></b>	<b>(D) Technical hours/year (D=A*B*C)</b>	<b>(E) Management hours/year (E=0.05*D)</b>	<b>(F) Clerical- hours/yea r (F=0.1*D)</b>	<b>(G) Cost<sup>b</sup>, \$</b>
Report Review:							
Notification of compliance status – cooling towers	2	1	51.3	102.7	5.1	10.3	\$5,094
Notification of compliance status – storage vessels	2	1	51.3	102.7	5.1	10.3	\$5,094
Notification of initial startup for storage vessels	2	1	0.33	0.7	0.033	0.066	\$33
Notification of inspection for storage vessels	1	1	0.33	0.3	0.017	0.033	\$16
Semiannual compliance report	1	2	51.3	102.7	5.1	10.3	\$5,094
<b>TOTAL BURDEN AND COST</b>				<b>355.3 hours/yr</b>			\$15,330

<sup>a</sup> There are 153 existing petroleum refineries that are subject to the Subpart CC rule. One new refinery is expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 51.33 (154÷3= 51.33). No travel is expected.

<sup>b</sup> This ICR uses the following average hourly labor rates: 59.63 for managerial (GS-13, Step 5, \$37.27 x 1.6), \$44.24 (GS-12, Step 1, \$27.65 x 1.6) for technical and \$23.94 (GS-6, Step 3, \$14.96 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) “2008 General Schedule” which excludes locality rates of pay.

**ATTACHMENT 1. INFORMATION REQUIREMENTS**

<b>Requirement</b>	<b>Rule citation</b>	<b>General Provisions citation</b>
<b><i>Monitoring</i></b>		
Storage vessels <sup>a</sup>	§63.646(m)	
Cooling tower leak detection and repair <sup>b</sup>	§63.654	NA
<b><i>Notifications</i></b>		
Notification of compliance status – cooling towers	§63.655(f)(1)(i)(A)(2)	40 CFR 63.9(h)
Notification of compliance status – storage vessels <sup>a</sup>	§63.655(f)(1)(i)(A)(1)	40 CFR 63.9(h)
Notification of initial startup for storage vessels <sup>a</sup>		NA
Notification of inspection for storage vessels <sup>a</sup>	§63.655(f)(1)(i)(A)(3)	NA
<b><i>Records</i></b>		
Cooling towers sampling results, leak detection and repair <sup>b</sup>	§63.655(i)(4)	NA
Storage vessels <sup>a</sup>	§63.655(j)	NA
<b><i>Reports</i></b>		
Leak detection and repair results in semiannual compliance reports	§63.655(g)(9)	NA
Annual inspection failure report for storage vessels <sup>a</sup>	§63.655(g)(1)(ii)	NA

<sup>a</sup> The proposed amendments adopt the OMB-approved requirements in 40 CFR Part 63, National Emission Standards for Storage Vessels (Tanks)—Control Level 2 for all Group 1 storage tanks. Refineries must continue to comply with the current rule until the compliance date for Subpart WW. Monitoring requirements consist of an initial inspection, annual inspections, and 10-year inspections. Reporting requirements in 40 CFR 63.1066(a) of Subpart WW include a notification of initial startup; periodic reporting requirements in 40 CFR 63.1066(b) include a notification of inspection and submission of a copy of the inspection record when an inspection failure occurs. Recordkeeping requirements in 40 CFR 63.1065 include information on vessel dimensions and capacity, inspection results, floating roof landings, and extensions. Refineries would be required to comply the first time a vessel is completely emptied and degassed or within 10 years, whichever comes first.

<sup>b</sup> The proposed amendments require a monthly sampling program for cooling towers subject to Subpart CC with records of sampling results and reports of leaks detected, repaired, or for which delays were repaired. Information of cooling towers subject to the requirements and those that are exempt must be included in the notification of compliance status report.