

Table 1: Annual Respondent Burden and Cost for NSPS for Gasoline Distribution Facilities (40 CFR part 60, subpart R) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year @ \$98.20 (E=C x D)	(F) Management Hours per Year @ \$114.49 (F= E x 0.05)	(G) Clerical Hours per Year @ \$48.53 (G= E x 0.1)	Total Labor Costs per Year ^b
1. APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS ^c								
4. REPORTING REQUIREMENTS								
A. Read Instructions	1	1	1	0	0	0	0	\$0.00
B. Required Activities								
Initial performance test ^c	175	1	175	0	0	0	0	\$0.00
Repeat of performance test ^c	175	1	175	0	0	0	0	\$0.00
Storage tank seal/seal gap inspections tanks certification ^d	16	1	16	51	816	40.8	81.6	\$88,762.44
Annual testing certification of area source compliance status ^e	1	1	1	345	345	17.3	34.5	\$37,528.24
C. Create Information				-----Included in 4B-----				
D. Gather Existing Information				-----Included in 4B-----				
E. Write Report ^c								
Notification of applicability	3	1	3	0	0	0	0	\$0.00
Notification of construction/reconstruction/modification	2	1	2	0	0	0	0	\$0.00
Notification of actual startup	2	1	2	0	0	0	0	\$0.00
Notification of performance test	2	1	2	0	0	0	0	\$0.00
Notification of CEMS performance evaluation	2	1	2	0	0	0	0	\$0.00
Notification of area source compliance status	1	1	1	0	0	0	0	\$0.00
Report of performance test				-----Included in 4B-----				
Semiannual compliance reports bulk terminals major sources ^f	10	2	20	52.2	1,044	52.2	104.4	\$113,563.71
Semiannual compliance reports pipeline breakout major sources ^f	8	2	16	9	144	7.2	14.4	\$15,663.96
			Total Reporting Hours by Labor Category		2,349	117	235	
TOTAL REPORTING BURDEN						2,701.4	Hours	\$255,518
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions				-----Included in 4A-----				
B. Plan Activities				-----Included in 4B and 5C-----				
C. Implement Activities								
Gasoline terminals:								
File cargo tank inspection records ^g	0.5	26	13	61.2	795.6	39.78	79.56	\$86,543.38
Update cargo tank inspection records ^g	6	1	6	61.2	367.2	18.36	36.72	\$39,943.10
Cross-check cargo tank inspection file ^g	6	26	156	61.2	9,547.2	477.36	954.72	\$1,038,520.55
Pipeline breakout stations				-----Included in 4B-----				
D. Develop Record System ^h	8	1	8	0	0	0	0	\$0.00
E. Time to Enter Information								
Record equipment subject to visual inspection requirements at pipeline breakout stations	1	1	1	0	0	0	0	\$0.00
Record equipment leaks data at bulk terminals	0.1	4	0.4	87	34.8	1.74	3.48	\$3,785.46
Record equipment leaks data at pipeline breakout stations	0.1	12	1.2	15	18	0.90	1.80	\$1,958.00
Record storage tank seal inspection results	1	1	1	51	51	2.55	5.10	\$5,547.65
Records of startups, shutdowns, malfunctions, etc.	1	4	4	51	204	10.2	20.4	\$22,190.61
Area source recordkeeping ⁱ	0.25	1.0	0.25	345	86.25	4.31	8.63	\$9,382.06
F. Time to train personnel	1	1	1	102	102	5.1	10.2	\$11,095.31
G. Time to adjust existing ways to comply with previously applicable requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
H. Time to transmit information				-----Included in 5E-----				
I. Time for audits: ^j	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bulk gasoline terminals	6	1	6	22	132	6.6	13.2	\$14,358.63
Pipeline breakout stations	4	1	4	4	16	0.8	1.6	\$1,740.44
			Total Recordkeeping Hours by Labor Category		11,354	568	1,135	
TOTAL RECORDKEEPING BURDEN						13,057.2	Hours	\$1,235,065
			Total Hours by Labor Category		13,703	685.2	1,370.3	
TOTAL ANNUAL BURDEN						15,759	Hours	\$1,490,584

Assumptions:

- ^a We have estimated that there are 102 respondents, comprised of 87 bulk terminals and 15 pipeline breakout stations, which are major sources of HAPs subject to this NESHAP. We have also estimated that no new respondents will become subject to the regulation in the next three years.
- ^b The labor rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c We have assumed that existing respondents are in compliance with initial rule requirements. New respondents would have to comply with the initial rule requirements including notifications and performance tests for add-on control devices.
- ^d Performance tests are required for vapor processing and collection systems: Method 27 for pressure, Method 21 for leak detection testing at cargo tanks. Annual certification test for cargo tanks using Methods 21 and 27 is required. However, we have assumed that 50 percent of the respondents that are major sources are currently subject to test requirements equivalent to the requirements of Bulk Gasoline Terminal NSPS (40 CFR part 60, subpart XX) and Volatile Organic Liquid (VOL) storage NSPS (40 CFR part 60, subparts K, Ka, and Kb) or the storage tank EPA Control Technique Guidelines (CTG) for pipeline breakout stations.
- ^e We have estimated that there is a total of 1,380 area sources (i.e., 980 bulk gasoline terminal and 400 pipeline breakout stations), of which 25 percent will be within 50 percent of major source threshold criteria (i.e., 345) and will be required to submit conduct an annual certification testing.
- ^f Respondents that are major sources of HAPs (i.e., 87 bulk terminals and 15 pipeline breakout stations) are required to submit semiannual compliance reports. We have assumed that 60 percent of the sources (i.e., 61.2 respondents, comprised of 52.2 bulk terminals and 9 pipeline breakout stations) would be required to submit semiannual reports under the NESHAP subpart R since the remaining 40 percent are already complying with similar reporting requirements under NSPS reporting requirements equivalent to the Bulk Gasoline Terminal NSPS (40 CFR part 60, subpart XX) for bulk terminals and the VOL storage NSPS (40 CFR part 60, subparts K, Ka, and Kb) or storage tank CTG's for pipeline breakout stations.
- ^g We have assumed that 60 percent of the 102 respondents (i.e., 61.2) are required to maintain cargo tank implementation files.
- ^h We have assumed that respondents already have the technology and recordkeeping systems in place to monitor its daily operations and to comply with existing regulations.
- ⁱ We have assumed that 25 percent of area source facilities (i.e., 345) will be required to keep annual records of their area source status using the screening equation.
- ^j We have assumed that 25 percent of respondents (i.e., 22 bulk terminals and 4 pipeline breakout stations) will conduct audits.

**Table 2: Annual Agency Burden and Cost for NSPS for Gasoline Distribution Facilities
(40 CFR part 60, subpart R) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT		(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$46.22 (E=C x D)	(F) Management Hours per Year @ \$62.27 (F= E x 0.05)	(G) Clerical Hours per Year @ \$25.01 (G= E x 0.1)
REPORT REVIEW								
	Notification of construction/reconstruction	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	Notification of actual startup	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	Notification of compliance status	10.00	0	0	0	0	0	0
	Notification of applicability	2.00	0	0	0	0	0	0
	Notification of performance test ^c	2.00	0	0	0	0	0	0
	Notification of CEMS performance evaluation	2.00	0	0	0	0	0	0
	Notification of compliance status	4.00	0	0	0	0	0	0
	Semiannual compliance reports ^d	10.00	2	20	61.2	1224	61.2	122.4
TOTAL ANNUAL HOURS						1224	61.2	122.4
TOTAL ANNUAL BURDEN							1407.6	Hours

Assumptions:

^a We have estimated that there are 102 respondents, including 87 bulk terminals and 15 pipeline breakout stations which are major sources of HAPs, subject to NESHAP subpart R. We have found that there are total of 1,380 area sources (i.e., 980 bulk gasoline terminal and 400 pipeline breakout stations), of which 50 percent (i.e., 345) would be certifying annually that they are below the rule applicability.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6) Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2009 General Schedule" which excludes rates of pay.

^c We have assumed that existing respondents are in compliance with initial rule requirements. New respondents would have to comply with the initial rule requirements including notifications and performance tests for add-on control devices.

^d We have assumed that 60 percent of the sources (i.e., 61.2) would be required to submit semiannual reports under the NESHAP subpart R since the remaining 40 percent are already complying with reporting requirements under another applicable NSPS rule.

Costs per Year ^b
n/a
n/a
\$0.00
\$0.00
\$0.00
\$0.00
\$0.00
\$63,444.20
\$63,444

urther estimated
e cutoff value for

x 1.6), \$46.21 for
cludes locality

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