SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal), EPA ICR Number 1844.06, OMB Control Number 2060-0554

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units were proposed on September 11, 1998, promulgated on April 11, 2002, and amended on both February 9, 2005, and April 20, 2006. These regulations apply to three types of affected units at major source petroleum refineries: fluid catalytic cracking unit for catalyst regeneration, catalytic reforming unit, and sulfur recovery unit. The rule also includes requirements for by-pass lines associated with the three affected units. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart UUU.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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 U. S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 123 major petroleum refineries per year will have one or more affected facilities subject to the standard. Furthermore, we have estimated that there are 538 affected units at the 123 major source petroleum refineries. No new or reconstructed facilities are expected over the next 3 years. However, it is estimated that one affected facility (0.33 per year) will conduct a performance test due to a process/operating change during the 3 year period of this ICR.

The active (previous) ICR had the following Terms of Clearance (TOC):

> When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC by consulting with industry. In addition, all calculations have been thoroughly reviewed and updated using the latest labor rates.

The respondents to this ICR are publicly-owned and -operated petroleum refineries (the "Affected Public"). None of the facilities are owned by either state, local and tribal agencies or the Federal Government. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, metal and organic hazardous air pollutant (HAP)

emissions from catalytic cracking units, organic and inorganic HAP emissions from catalytic reforming units, and HAP emissions from sulfur recovery units and bypass lines either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart UUU.

2(b) Practical Utility/Users of the Data

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

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

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is 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 63, subpart UUU.

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, duplication does not exist.

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 (77 FR 63813) on October 17, 2012. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has previously been reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the National Petrochemical and Refiners Association (NPRA), at (202) 457-0480; and 2) the API, at (202) 682-8319.

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or

nonexistence of essential records.

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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of major source petroleum refineries that operate catalytic cracking units, catalytic reforming units, or sulfur recovery units. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2911, which corresponds to the North American Industry Classification System (NAICS) code 32411 for Petroleum Refineries.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU).

A source must make the following reports:

Notifications	
Notification of intention to construct or reconstruct	63.9(b)(5), 63.1574(a)
Notification of anticipated date of initial startup	63.9(b)(4)(iv), 63.1574(a)
Notification of commencement of construction	63.9(b)(4)(iii), 63.1574(a)
Notification of the actual date of startup	63.9(b)(4)(v), 63.1574(a)
Notification of performance tests	63.7(a), 63.9(e), 63.1574(a)
Notification of compliance status	63.9(g), 63.1574(d), (f)

Notifications	
Request for compliance extension	63.9(c), 63.1574(e)

Reports	
Semiannual compliance reports	63.10(e)(3), 63.1575
Startup, shutdown, and malfunction plan/reports	63.6(3), 63.10(d)(5), 63.1570, 63.1575

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, and malfunction plan/reports	63.1576(a)(2), 63.10(b)(2)
Maintenance	63.10(b)(2)(iii), 63.1576(d)
CMS/CEM malfunction	63.1576(b), 63.10(c)
Emissions data	63.1576(a)(3), 63.10(d)
Notification of compliance status	63.1576(a)(1), 63.9(h)
CEM quality assurance plan	63.1576(b), 63.8(d)
CEM general provisions	63.1576(b), 63.10(c)
Records are required to be retained for 5 Years	63.10(c), 63.428(d)

Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.

Respondent Activities
Install, calibrate, maintain, and operate CMS for opacity or for emission monitoring for catalytic cracking units, catalytic reforming units and sulfur recovery systems.
Perform initial performance test, Reference Method 5B or 5F (40 CFR part 60) test for PM, 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.

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

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
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 OTIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS 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 OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five 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. A small entity for petroleum refineries is defined as a firm having no more than 1,500 corporate employees. Numerous compliance and monitoring alternatives are provided in the rule to give small entities a maximum degree of operational flexibility. The rule requirements are considered to be the minimum necessary to demonstrate compliance.

Under section 112(i) of the Clean Air Act, the Administrator or applicable permitting authority also may grant one (1) additional year if more time is needed to install controls for a source. This additional time will ease any capital availability problems for plants in marginal economic condition. The Agency expected three affected units to qualify for the compliance extension.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 10,237 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$123.04 ($58.59+ 110%)
Technical	$101.22 ($48.20 + 110%)
Clerical	$51.18 ($24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one- time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the 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) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
COMS (FCCUs)	$95,700	0	$0	$28,600	23	$657,800
CPMS (FCCUs)	$18,900	0	$0	$25,350	75	$1,901,250
CPMS (CRUs)*	$0	0	$0	$25,179	114	$2,870,406
CPMS (SRUs)	$74,000	0	$0	$26,000	78	$2,028,000
CEMS (SRUs)	$150, 000	0	$0	$34,840	27	$940,680
TOTAL			**$0**			**$8,398,136**

Note: We estimate that there are 128 refineries (major sources) with 538 units. This includes 98 sources with 115 FCCU units, 114 sources with 160 CRU units, and 105 sources with 253 SRU units.

* We estimate that there are 114 sources using 160 CRUs / CPMS for monitoring (i.e., an average of 1.40 CRUs per source) at an O&M cost of $17,940 per CPMS which total $25,179 per respondent.

COMS – continuous opacity monitoring system
CEMS – continuous emission monitoring system
CPMS – continuous parametric monitoring system
FCCU – fluid catalytic cracking unit
CRU – catalytic reforming unit
SRU – sulfur recovery unit

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

The total operation and maintenance (O&M) costs for this ICR are $8,398,136. 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 $8,398,136. These are the costs of recordkeeping.

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

$25,566.

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

Managerial	$62.27 (GS-13, Step 5, $38.92 + 60%)
Technical	$46.21 (GS-12, Step 1, $28.88 + 60%)
Clerical	$25.01 (GS-6, Step 3, $15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2013 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal).

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

Based on our research for this ICR, approximately 123 existing respondents will be subject to the standards on average over the next three years. It is estimated that no additional respondents per year will become subject, and that all sources have complied with the initial requirements. However, it is estimated that one affected facility (0.33 per year) will conduct a performance test due to a process/operation change. The overall average number of respondents, as shown in the table below, is 123 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents [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	0.33	123	0	0.33	123
2	0.33	123	0	0.33	123
3	0.33	123	0	0.33	123
Average	0.33	123	0	0.33	123

[1] New respondent include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 123.

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 performance test	0.33	1	0	0.33
Semiannual compliance report	2	123	0	246
			Total	**246.33**

The number of Total Annual Responses is 246 (rounded).

The total annual labor costs are $1,001,304. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 10,237 hours at a cost of $1,001,304. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 42 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $8,398,136. 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 the next three years is estimated to be 567 labor hours at a cost of $25,566. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and

Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment decrease in the respondent and Agency labor hours in this ICR compared to the previous ICR. The decrease occurred because all sources have met the initial compliance requirement, and therefore, will not incur burden associated with initial notification and performance test during the three-year period of this ICR. The decrease also resulted from an update in the respondent universe from 132 to 123 major source facilities. The estimate was obtained from EPA's non-CBI Component 1 Section 114 ICR database and is based on 2010 data.

However, there is an overall increase in respondent labor costs due to an adjustment in labor rates. This ICR uses updated labor rates in calculating all costs. There is also an increase in the total O&M costs due to an update in the estimated number of sources.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 42 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 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-2012-0679. 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0679 and OMB Control Number 2060-0554 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 – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year	(D) Respondents per year [a]	(E) Technical person-hours per year	(F) Management person-hours per year	(G) Clerical person-hours per year	(H) Total Cost per Year $ [b]
			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions [c]	2	1	2	0.33	0.66	0.03	0.07	$74.24
B. Required activities [c]								
Initial Performance test [c]	40	1	40	0	0	0	0	$0
Performance test [d]	40	1	40	0.33	13.2	0.66	1.32	$1,484.87
Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	$0
Operating, maintenance, and monitoring plan [b]	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/ reconstruction	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Notification of special compliance requirements	N/A							
Notification of performance test [b]	2	1	2	0.33	0.66	0.03	0.07	$74.24
Notification of compliance status [b]	4	1	4	0	0	0	0	$0
Extended compliance request	N/A							
Report of performance test [c]	See 3B							
Semiannual compliance reports [e]	10	2	20	123	2,460	123	246	$276,725.40
Subtotal for Reporting Requirements					**2,845.7**			**$278,358.75**
4. Recordkeeping Requirements								

A. Read instructions	See 3A							
B. Plan activities [c]	See 3B							
C. Implement activities [c]	See 3B							
D. Develop record system [f]	N/A							
E. Time to enter information [g, h]								
Records of operations	1	52	52	123	6,396	319.8	639.6	$719,486.04
F. Time to train personnel	4	1	4	0	0	0	0	$0
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information [b, i]	0.25	1	0.25	123	31	1.54	3.1	$3,459.07
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**7,391.04**			**$722,945.11**
TOTAL LABOR BURDEN AND COST (rounded)					**10,237**			**$1,001,304**

Assumptions:

[a] We have determined that 123 major petroleum refineries operation will have one or more affected facilities subject to the standard. Furthermore, we have estimated that there is an average of 528 affected units at the 123 major source petroleum refineries. No new or reconstructed facilities are expected over the next 3 years.

[b] This ICR uses the following labor rates: $123.04 per hour for Executive, Administrative, and Managerial labor; $101.22 per hour for Technical labor, and $51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that all existing respondents (123 major source petroleum refineries) over the next 3 year s of this ICR have complied with the rule's initial requirements including the initial performance test.

[d] We have assumed that one respondent over the next 3-years of this ICR will conduct a performance test due to significant process/operating change (1/3 = 0.33).

[e] We have assumed that all sources would be submitting semiannual compliance reports.

[f] We have assumed that these sources will have the record system in place to monitor operations.

[g] We have assumed that depending on the compliance option for the affected facility (i.e., catalytic cracking unit, sulfur recovery units, and by-pass lines) selected by the respondent and the size of the catalytic cracking unit and control device used (e.g., wet scrubber, electrostatic precipitator and thermal incinerators), sources are required to either install continuous opacity monitoring systems and/or continuous parameter monitoring, or choose an alternative option for parameter monitoring.

[h] We have assumed that all respondents would have to keep records of their operations according to the operation and maintenance plan.

[i] We have assumed that it will take each respondent approximate one hour to record data per week (52 weeks) and 15 minutes to transmit it semiannually.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units (40 CFR Part 63, Subpart UUU) (Renewal)

Activity	(A) Hours per occurrence	(B) Number of occurrence per plant-year	(C) Hours per plant per year	(D) Plants per year	(E) Technical person-hours per year	(F) Management person-hours per year	(G) Clerical person-hours per year	(H) Total Cost per Year $ [a]
			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	
Report Review								
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of initial performance test [b]	2	1	2	0.33	0.66	0.03	0.07	$34.20
Notification of performance test [c]	2	1	2	0.33	0.66	0.03	0.07	$34.20
Notification of compliance status	2	1	2	0	0	0	0	$0
Review of operation, maintenance, and monitoring plan [b]	4	1	4	0	0	0	0	$0
Review of repeat performance test report	8	1	8	0	0	0	0	$0
Review of compliance report	N/A							
Review of semiannual compliance reports [d]	2	2	4	123	492	24.6	49.2	$25,497.65
Review of NESHAP waiver application	4	1	4	0	0	0	0	$0
TOTAL ANNUAL BURDEN AND COST (rounded)					**567**			**$25,566**

Assumptions:

[a] This cost is based on the following labor rates: Managerial rate of $62.27 (GS-13, Step 5), Technical rate of $46.21 (GS-12, Step 1), and Clerical rate of $25.01 (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package available to government employees.

[b] We have assumed that all existing respondents (123 major source petroleum refineries) over the next 3 years of this ICR have complied with the rule initial requirements including the initial performance test.

[c] We have assumed that one respondent over the next 3-years of this ICR will conduct a performance test due to significant process/operating change (1/3 = 0.33).

[d] We have assumed that all sources would be submitting semiannual compliance reports.