

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal), EPA ICR Number 0664.11, OMB Control Number 2060-0006.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Bulk Gasoline Terminals were proposed December 17, 1980, promulgated on August 18, 1983, and amended on December 22, 1983, February 12, 1999, and December 19, 2003. These regulations apply to the total of all loading racks at bulk gasoline terminals which deliver liquid product into gasoline tank trucks and for which construction, modification, or reconstruction commenced after the date of proposal. A bulk gasoline terminal is any gasoline facility which receives gasoline by pipeline, ship, or barge, and has a gasoline throughput greater than 75,700 liters per day. The affected facility includes the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tank trucks. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. The standard sets initial notification, initial performance test, and ongoing recordkeeping requirements. This information is being collected to assure compliance with 40 CFR Part 60, Subpart XX.

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.

Over the next three years, an average of 40 respondents per year will be subject to the provisions, which includes maintaining a file of these measurements and retaining a file for at least two years following the date of such measurements, maintenance reports and records. These facilities are privately-owned, for-profit businesses, and are not owned by state, local, tribal, or the Federal government. No additional respondents per year will become subject to the standard.

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

The Office of Management and Budget (OMB) approved the currently active 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, volatile organic compounds (VOC) emissions from bulk gasoline terminals 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 XX.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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 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 are being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart XX.

3(a) Nonduplication

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* (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the *Federal Register*.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. 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 the EPA Office of Compliance. OTIS is the EPA 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. In developing this ICR, we contacted the American Petroleum Institute (API) at (202) 682-8319, and the Oil Price Information Services (OPIS) at (877) 210-4287.

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.

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.

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 (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 bulk gasoline terminals. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 5171, which corresponds to the North American Industry Classification System (NAICS) code 424710 for Petroleum Bulk Stations and Terminals.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change	60.7(a)(4)
Notification of performance test	60.8(d)
Notifying the owner or operator of each non-vapor-tight gasoline truck loaded	60.502(e)(4)

Reports	
Reporting performance test results	60.8(a)

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, or malfunction period where the continuous monitoring system is inoperative	60.7(b)
Record the tank identification number as each gasoline tank truck is loaded	60.502(e)(2)
Record each leak detected during each calendar month inspection of control equipment during loading operations	60.502(j)
Record of documentations for tank trucks vapor tightness – kept on permanent record	60.502(a)
Record of monthly leak inspection required for 2 years	60.505(c)
Record of notification under 60.502(e)(4) for 2 years	60.505(d)
Records of replacement parts or additions for 3 years	60.505(f)
Annual update of records of tank truck vapor tightness	60.505(b)

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.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 2A, 2B, 21, 25A, 25B, and 27 tests, 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 Online Tracking Information System (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, 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 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 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 to be the minimum

requirements 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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (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 13,165 (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	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

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 \$0.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (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 40 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 40 per year.

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

Number of Respondents		
	Respondents That Submit Reports	Respondents That Do Not Submit Any Reports

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 ²	(E) Number of Respondents (E=A+B+C-D)
1	0	40	0	0	40
2	0	40	0	0	40
3	0	40	0	0	40
Average	0	40	0	0	40

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

² Column D is subtracted to avoid double-counting respondents.

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
Initial notification	0	0	0	0
Report of performance test	0	0	0	0
Periodic reports	0	0	0	0
Records of operations	40	0	40	40
			Total	40

The number of Total Annual Responses is 40.

The total annual labor costs are \$1,288,907. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (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 in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 13,165. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 329 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 0 labor hours at a cost of \$0. See Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in the total estimated respondent burden compared with the ICR currently approved by OMB.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 329 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-2014-0027. 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) 566-1927. 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-2014-0027 and OMB Control Number 2060-0006 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 Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	0	0	0	0	\$0
B. Required activities								
Initial performance tests ^c	60	1	60	0	0	0	0	\$0
Repeat of performance tests ^d	60	0.2	12	0	0	0	0	\$0
Monitoring of operations and equipment ^e	See 4E							
C. Gather existing information	See 3B and 4E							
D. Write Report								
Notification of compliance status	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Report of performance test results	See 3B							
Operation and maintenance reports	N/A							
Semiannual reports ^f	N/A							
Subtotal for Reporting Requirements						0		\$0
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement Activities	See 3A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
D. Develop record system	N/A							
E. Time to enter and transmit information								
Records of startup, shutdown, malfunction ^g	1.5	50	75	40	3,000	150	300	\$337,764.00
Record of tank identification numbers ^h	0.1	2,100	210	40	8,400	420	840	\$945,739.20
Leak detection records of monthly control equipment inspections ⁱ	0.1	12	1.2	40	48	2.4	4.8	\$5,404.22
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						13,165.20		\$1,288,907.42
TOTAL LABOR BURDEN AND COST (rounded)						13,165		\$1,288,907

Assumptions:

^a We have assumed that there are approximately 40 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, Table 2. Civilian Workers, by Occupational and Industry groups. 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 it will take 60 hour for each respondent to perform initial performance tests. All sources are in compliance with initial rule requirements including initial performance test.

^d We have assumed that 20 percent of sources would have to repeat performance test due to failure.

^e Monitoring of operations includes: implementation of Standards Operating Procedures (SOP) for operation and maintenance of control equipment; records of tank identification numbers and monthly leak detection inspection of control equipment.

^f We have assumed that there will be no semiannual reporting requirements for the subpart.

^g We have assumed that it will take 1.5 hours, fifty times per year, for each respondent to enter and transmit SSM reports.

- ^h We have assumed that each respondent will take 0.1 hour or 6 minutes to enter each tank identification number, at an average of six tank truck loading each day for 350 days a year for an occurrence of 2,100 times per year (6×350 days per year = 2,100).
- ⁱ We have assumed that each respondent will take 5 minutes to record leak detection information twelve times per year.

Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (Cx D)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Initial notification ^c	2	1	2	0	0	0	0	\$0
Report of performance test results	8	1	8	0	0	0	0	\$0
Semiannual reports ^d	N/A							
TOTAL ANNUAL BURDEN AND COST (rounded)						0		\$0

Assumptions:

^a We have assumed that there are approximately 40 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.90 for Managerial, \$46.67 for Technical, and \$25.25 Clerical. These rates are from the Office of Personnel Management (OPM) “2014 General Schedule” which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d The rule does not require periodic reporting.