SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal),
EPA ICR Number 2062.06, OMB Control Number 2060-0534.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation (40 CFR Part 63, Subpart GGGGG) were proposed on July 30, 2002, promulgated on October 8, 2003, and amended on November 29, 2006. These regulations apply to site remediation activities that clean up materials containing organic hazardous air pollutants (HAP), where the site remediation is co-located at any facility with one or more stationary source that emit HAP, and where the facility is a major source of HAP. Major sources of HAP are sources that emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. Site remediation activities may potentially occur at any facility where materials containing organic HAP currently are or have been stored, processed, treated, or otherwise managed at the facility. The types of businesses most likely to be subject to this rule include, but are not limited to, organic liquid storage terminals, petroleum refineries, chemical manufacturing facilities, and manufacturing facilities using organic materials. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart GGGGG.

In general, all NESHAP standards require initial notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such 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.

The “Affected Public” includes owners and operators of facilities that conduct site remediation activities. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (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 Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 286 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. Of the 286 respondents, we estimate 243 respondents from the private sector (85 percent), 14 respondents from the state, local, or tribal governments (5 percent), and 29 respondents from the Federal government (10 percent).

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 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, HAP emissions from site remediation activities 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 GGGGG.

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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, 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.

To minimize the burden, much of the information the EPA needs to determine compliance is recorded and retained on-site at the facility. Such information will be reviewed by the enforcement personnel during an inspection and will not need to be reported routinely to the EPA. The Agency requires respondents to report a minimal amount of information to demonstrate compliance. However, when a deviation occurs, additional information must be reported that describes the cause of the deviation, steps taken to correct the problem, and time required to return to compliance.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart GGGGG.

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 (80 FR 32116) on June 5, 2015. 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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the American Chemistry Council (ACC), at (202) 249-7000; and 2) Regenesis, at (949) 366-8000

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 the standards. EPA believes that the five-year records retention requirement is consistent with 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 these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

Unlike a specific industry sector or type of business, the respondents potentially affected by this ICR cannot be easily or definitively identified. Potentially, the site remediation NESHAP may be applicable to any type of business or facility at which a site remediation is conducted to clean up media contaminated with organic HAP, and the remediation activities performed and the magnitude of the cleanup meets the applicability criteria specified in the rule. A site remediation that is subject to this rule potentially may be conducted at any type of privately owned or government-owned facility at which contamination has occurred due to past events or current activities at the facility. Site remediation performed at sites where the facility has permanently closed, the owner has gone out of business, or the facility has been abandoned and there is no owner (in this latter case, a government agency takes responsibility for the cleanup) are not subject to this NESHAP in most cases.

The regulated sources under this NESHAP (i.e., the site remediation activities) are not the predominant activity, process, operation, or service conducted at the facility. A comprehensive list of Standard Industrial Classification (SIC) codes and North American Industry Classification System (NAICS) codes cannot be compiled for the respondents who will potentially be regulated by this action due to the nature of activities regulated by the source category. The NAICS code indicates a primary product produced or service provided at the facility rather than the presence of a site remediation performed to support the predominant function of the facility. Some representative NAICS codes and their corresponding SIC codes for facilities where site remediation activities have been, or are currently being conducted at some (but not all) facilities under a given code can be found in the table below. However, these codes are not necessarily comprehensive as to the types of facilities at which site remediation subject to the rule may be required in the future.

Standard (40 CFR Part 63, Subpart GGGGG)	SIC Codes	NAICS Codes
Plastics Material and Resin Manufacturing	2821	325211
Cyclic Crude, Intermediate and Gum and Wood Chemical Manufacturing	2861, 2865, 2869	325194
Other Basic Inorganic Chemical Manufacturing	2812, 2816, 2819, 2869, 2895	325180
Petroleum Refineries	2911,	32411
General Warehousing and Storage	4225, 4226	49311
Other Warehousing and Storage	4226	49319
Pipeline Transportation of Crude Oil	4612	48611

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG).

A source must make the following reports:

Notifications/Reports	
Initial notification	63.9(b), 63.7950(a), (c)
Notification of performance tests	63.9(b), (e), 63.7950(a), (d)
Notification of compliance status	63.9(h), 63.7950(a), (e)
Performance test results	63.9(h), 63.7950(a), (e)
Notification of alternative standard selection (if applicable)	63.7950(f)
Semiannual compliance reports	63.7951(a), (b)
Startup, shutdown, malfunction reports	63.7951(a), (b), (c)
Part 70 monitoring report	63.7951(d)

A source must keep the following records:

Recordkeeping	
Copies of each notification and report submitted to comply with subpart as listed above	63.7952(a)(1)
Records related to startups, shutdowns, and malfunctions	63.7952(a)(2)
Records of performance tests	63.7952(a)(3)
Records of initial and subsequent determinations for affected sources exempted from control requirements	63.7952(a)(4)
Records of control device operating parameter continuous monitoring system (CMS) deviations, calibrations, and maintenance	63.7952(b)
Records to show continuous compliance with each emissions limitation, work practice standard, and operation and maintenance requirement	63.7952(c), (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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for VOHAP.
Perform initial performance test, 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

Respondent Activities
providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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.
Conduct initial compliance determination.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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 standards. 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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial- and government-owned facilities. EPA uses ICIS 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

The rule places no requirement on any facility to initiate site remediation activities. The EPA anticipates that parties that undertake site remediation generally do so voluntarily and that the impact of this rule on those parties will not be significant. Further, because states and other parties decide whether to undertake site remediation activities, predicting how many, or what types of small entities will undertake such activities is extremely difficult, if not impossible. Nonetheless, the rule is structured to avoid impacts on small businesses.

The rule specifically excludes from its scope remediation conducted at gasoline stations, farm sites, and residential sites. Moreover, the rule applies only to remediation sites located at a facility that is a major source under the CAA and at which is collocated with one or more non-remediation activities listed as a Maximum Achievable Control Technology (MACT) major source category, pursuant to CAA section 112(c). Such sources tend to be large businesses. The rule also contains applicability emission thresholds that are likely to exclude site remediation conducted at many small businesses. For example, the rule exempts sources where the total annual quantity of HAP contained in all extracted remediation material at the facility is less than 1 megagram per year. For these reasons, the rule does not impose a significant burden on a substantial number of small entities.

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 Site Remediation (40 CFR Part 63, Subpart GGGGG) (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 140,000 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	$138.43 ($65.92+ 110%)
Technical	$106.45 ($50.69 + 110%)
Clerical	$52.77 ($25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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)
Parametric system	$10,000	0	$0	$2,000	286	$572,000
Leak detection	$1,500	0	$0	$1,000	10	$10,000
Total			$0			$582,000

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $582,000. This is the

total of column G, which is the total cost for all 286 respondents. The cost estimate includes $494,497 from the private sector (243 respondents), $28,490 from the state, local, or tribal governments (14 respondents), and $59,014 from the Federal government (29 respondents).

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 $582,000. These are recordkeeping 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 $244,000.

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

Managerial	$64.16 (GS-13, Step 5, $40.10 + 60%)
Technical	$47.62 (GS-12, Step 1, $29.76 + 60%)
Clerical	$25.76 (GS-6, Step 3, $16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 Site Remediation (40 CFR Part 63, Subpart GGGGG) (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 286 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 286 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	(E) Number of Respondents (E=A+B+C-D)
1	0	286	0	0	286
2	0	286	0	0	286
3	0	286	0	0	286
Average		286			286

[1] New respondents 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 286 (243 respondents from the private sector, 14 respondents from the state, local, or tribal governments, and 29 respondents from the Federal government).

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
Semiannual reports	286	2	0	572
			Total	572

The number of Total Annual Responses is 572.

The total annual labor costs are $13,300,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (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 140,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Site Remediation

(40 CFR Part 63, Subpart GGGGG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 245 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $582,000. 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 5,260 labor hours at a cost of $244,000. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total respondent burden hours as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The decrease in labor hours occurred because this ICR corrects a mathematical error in calculating managerial hours. The previous ICR inadvertently calculated managerial labor hours as 50% of technical labor hours, rather than 5%, for Federal Government respondents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 245 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-2012-0695. 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), WJC 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-2012-0695 and OMB Control Number 2060-0534 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 Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person hrs per year (E=CxD)	(F) Management person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Total Cost per year ($) [b, c]
Private Sector								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric								
A. Monitoring System	40	1	40	0	0	0	0	$0
4. Reporting requirements								
A. Familiarize with regulatory requirements [d]	16	1	16	243	3,888	194.4	388.8	$461,305.37
B. Conduct performance test	120	1	120	0	0	0	0	$0
C. Initial notification	0	1	0	0	0	0	0	$0
D. Performance test notification	0	1	0	0	0	0	0	$0
E. Initial compliance determination	40	1	40	0	0	0	0	$0
F. Performance test report	80	1	80	0	0	0	0	$0
G. Semiannual report [e]	40	2	80	243	19,440	972	1,944	$2,306,526.84
H. SSM report	8	0	0	0	0	0	0	$0
Subtotal Reporting for Private Sector					**26,827**			**$2,767,832**
5. Recordkeeping requirements								
A. Familiarize with regulatory requirements [d]	See 4A							
B. Plan activities	100	1	100	0	0	0	0	$0
C. Prepare SSM plan	80	1	80	0	0	0	0	$0
D. Prepare documentation for exempted sources	80	1	80	22.1	1,768	88.4	176.8	$209,770.55
E. In-situ process vents parametric monitoring [f]	0.5	365	182.5	22.1	4,033.25	201.66	403.33	$478,539.06
F. Ex-situ process vents parametric monitoring [g]	0.5	365	182.5	220.9	40,314.25	2,015.71	4,031.43	$4,783,225.29

G. Inspect tank covers	2	12	24	216.7	5,200.8	260.04	520.08	$617,067.12
H. Inspect container covers	0.5	12	6	220.9	1,325.4	66.27	132.54	$157,256.72
I. Inspect surface impoundment covers [h]	2	12	24	4.2	100.8	5.04	10.08	$11,959.77
J. Inspect separator covers [i]	2	12	24	4.2	100.8	5.04	10.08	$11,959.77
K. Inspect transfer system covers	0.5	12	6	220.9	1,325.4	66.27	132.54	$157,256.72
L. Leak detection and repair program [j]	100	1	100	8.5	850	42.50	85	$100,851.23
M. Develop record system	100	1	100	0	0	0	0	$0
N. Enter information [k]	2	52	104	243	25,272	1,263.6	2,527.2	$2,998,484.89
O. Personnel training	20	0	0	0	0	0	0	$0
Subtotal Recordkeeping for Private Sector					**92,334**			**$9,526,371**
Total for the Private Sector					**119,000**			**$12,300,000**
State, Local or Tribal Government								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric								
A. Monitoring System	40	1	40	0	0	0	0	$0
4. Reporting requirements								$0
A. Familiarize with regulatory requirements [d]	16	1	16	14	224	11.2	22.4	$11,962.50
B. Conduct performance test	120	1	120	0	0	0	0	$0
C. Initial notification	0	1	0	0	0	0	0	$0
D. Performance test notification	0	1	0	0	0	0	0	$0
E. Initial compliance determination	40	1	40	0	0	0	0	$0
F. Performance test report	80	1	80	0	0	0	0	$0
G. Semiannual report [e]	40	2	80	14	1,120	56	112	$59,812.48
H. SSM report	8	0	0	0	0	0	0	$0
Subtotal Reporting for State/Local/Tribal Government					**1,546**			**$71,775**
5. Recordkeeping requirements								
A. Familiarize with regulatory requirements [d]	See 4A							

B. Plan activities	100	1	100	0	0	0	0	$0
C. Prepare SSM plan	80	1	80	0	0	0	0	$0
D. Prepare documentation for exempted sources	80	1	80	1.3	104	5.2	10.4	$5,554.02
E. In-situ process vents parametric monitoring [f]	0.5	365	182.5	1.3	237.25	11.86	23.73	$12,670.10
F. Ex-situ process vents parametric monitoring [g]	0.5	365	182.5	12.7	2,317.75	115.89	231.78	$123,777.12
G. Inspect tank covers	2	12	24	12.5	300	15	30	$16,021.20
H. Inspect container covers	0.5	12	6	12.7	76.2	3.81	7.62	$4,069.38
I. Inspect surface impoundment covers [h]	2	12	24	0.2	4.8	0.24	0.48	$256.34
J. Inspect separator covers [i]	2	12	24	0.2	4.8	0.24	0.48	$256.34
K. Inspect transfer system covers	0.5	12	6	12.7	76.2	3.81	7.62	$4,069.38
L. Leak detection and repair program [j]	100	1	100	0.5	50	2.5	5	$2,670.20
M. Develop record system	100	1	100	0	0	0	0	$0
N. Enter information [k]	2	52	104	14	1,456	72.8	145.6	$77,756.22
O. Personnel training	20	0	0	0	0	0	0	$0
Subtotal Recordkeeping for State/Local/Tribal Government					**5,321**			**$247,100**
Total for the State, Local or Tribal Government					**6,870**			**$319,000**
Federal Government								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric								
A. Monitoring System	40	1	40	0	0	0	0	$0
4. Reporting requirements								$0
A. Familiarize with regulatory requirements [d]	16	1	16	29	464	23.2	46.4	$24,779.46
B. Conduct performance test	120	1	120	0	0	0	0	$0
C. Initial notification	0	1	0	0	0	0	0	$0
D. Performance test notification	0	1	0	0	0	0	0	$0
E. Initial compliance determination	40	1	40	0	0	0	0	$0
F. Performance test report	80	1	80	0	0	0	0	$0
G. Semiannual report [e]	40	2	80	29	2,320	116	232	$123,897.28

H. SSM report	8	0	0	0	0	0	0	$0
Subtotal Reporting for Federal Government					**3,202**			**$148,677**
5. Recordkeeping requirements								
A. Familiarize with regulatory requirements [d]	See 4A							
B. Plan activities	100	1	100	0	0	0	0	$0
C. Prepare SSM plan	80	1	80	0	0	0	0	$0
D. Prepare documentation for exempted sources	80	1	80	2.6	208	10.4	20.8	$11,108.03
E. In-situ process vents parametric monitoring [f]	0.5	365	182.5	2.6	474.5	23.73	47.45	$25,340.20
F. Ex-situ process vents parametric monitoring [g]	0.5	365	182.5	26.4	4,818	240.9	481.8	$257,300.47
G. Inspect tank covers	2	12	24	25.9	621.6	31.08	62.16	$33,195.93
H. Inspect container covers	0.5	12	6	26.4	158.4	7.92	15.84	$8,459.19
I. Inspect surface impoundment covers [h]	2	12	24	0.5	12	0.6	1.2	$640.85
J. Inspect separator covers [i]	2	12	24	0.5	12	0.6	1.2	$640.85
K. Inspect transfer system covers	0.5	12	6	26.4	158.4	7.92	15.84	$8,459.19
L. Leak detection and repair program [j]	100	1	100	1	100	5	10	$5,340.40
M. Develop record system	100	1	100	0	0	0	0	$0
N. Enter information [k]	2	52	104	29	3,016	150.8	301.6	$161,066.46
O. Personnel training	20	0	0	0	0	0	0	$0
Subtotal Recordkeeping for Federal Government					**11,016**			**$511,552**
Total for the Federal Government					**14,200**			**$660,000**
Total Labor Burden and Cost (rounded) [l]					**140,000**			**$13,300,000**
Total Capital and O&M Cost (rounded) [l]								**$582,000**
Grand Total (rounded) [l]								**$13,900,000**

Assumptions:

[a] We have assumed that there are approximately 286 respondents, with no additional new sources becoming subject to the rule over the next three years. The breakdown if as follows: 243 respondents for from the private sector, 29 from the Federal government, and 14 from state, local or tribal governments.

[b] This ICR uses the following labor rates for the private sector respondents: $106.45 for technical, $138.43 for managerial, and $52.77 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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.

[c] This ICR uses the following labor rates for state/local/tribal and Federal government respondents :$47.62 for technical, $64.16 for managerial, and $25.76 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2016 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.

[d] We have assumed that each respondent will have to familiarize with regulatory requirements each year.

[e] We have assumed that each respondents will take 40 hours twice per year to complete semiannual report.

[f] We have assumed that 26 out of 286 respondents (9 percent) are estimated to use an in-situ treatment process. At each of these sites, it is assumed that a control device is required on the process vent.

[g] We have assumed that respondents will each take 0.5 hours 365 time per year to monitor ex-situ process vents parametric. It is also assumed that out of 286 respondents, 91 percent or (260 respondents) will use an on-site ex-situ treatment process.

[h] We have assumed that each respondents will take 2 hours once per month to inspect surface impoundment. It is assumed that 5 out of 260 sites use a surface impoundment in place of tanks.

[i] We have assumed that each respondent will take 2 hours once per month to inspect separator covers. It is also assumed that five of the sites will use oil-water separators.

[j] We have assumed that 10 facilities will be implementing a LDAR program.

[k] We have assumed that each respondent will take 2 hours 52 times per year to enter information.

[l] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person hrs per year (E=CxD)	(F) Management person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year ($)
Report Review								
a. Initial notification	4	0	0	0	0	0	0	$0
b. Performance test notification	2	0	0	286	0	0	0	$0
c. Initial compliance determination	24	0	0	0	0	0	0	$0
d. Performance test reports	24	0	0	286	0	0	0	$0
e. Semiannual report [c]	8	2	16	286	4,576	228.8	457.6	$244,376.70
Total Annual Burden and Cost (rounded) [d]					**5,260**			**$244,000**

Assumptions:

[a] We have assumed that there are approximately 286 respondents, with no additional new sources becoming subject to the rule over the next three years. The breakdown if as follows: 243 respondents for from the private sector, 29 from the Federal government, and 14 from state, local or tribal governments.

[b] This ICR uses the following labor rates: $47.62 for technical, $64.16 for managerial, and $25.76 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2016 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.

[c] We have assumed that it will take eight hours twice per year for each respondent to review semiannual report.

[d] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.