

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Revised), EPA ICR Number 2062.06, OMB Control Number 2060-0534.

1(b) Short Characterization/Abstract

The amendments to this information collection request (ICR) are a result of proposed amendments to the applicability requirements of the existing Site Remediation NESHAP. The NESHAP for Site Remediation was proposed on July 30, 2001, and promulgated on October 8, 2003. Other amendments to these regulations were proposed on May 1, 2006, and promulgated on November 29, 2006. These regulations apply to site remediation activities that use certain types of equipment to clean up materials containing organics that potentially could be released to the atmosphere as a hazardous air pollutant (HAP). These site remediation activities can potentially be conducted 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 the rule include, but are not limited to, organic liquid storage terminals, petroleum refineries, chemical manufacturing facilities, and manufacturing facilities using organic materials. This information is being collected to assure compliance with 40 CFR part 63, subpart GGGGG.

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.

This proposed rulemaking would amend title 40, chapter I, part 63 subpart GGGGG by removing an exemption from the applicability provisions for site remediation activities performed under the authority of the Comprehensive Environmental Response and Compensation Liability Act (CERCLA) and for site remediation activities performed under a Resource Conservation and Recovery Act (RCRA) corrective action or other required RCRA order. Burden changes associated with the proposed amendments would result from emissions control and monitoring, recordkeeping and reporting requirements for facilities that now become subject to subpart GGGGG.

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.

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

The period considered in this ICR and throughout this supporting statement is the first three years following the promulgation of the amended Site Remediation NESHAP. The estimates of the size of the regulated universe are based on the number of affected facilities found in EPA ICR number 2062.05 plus information collected from databases associated with the RCRA and CERCLA programs. There are an estimated 286 major source facilities currently subject to the Site Remediation NESHAP. With the proposed amendments to the NESHAP, we expect 69 additional facilities to become subject to the standards over the next three years. We do not know of any new facilities that are expected to be constructed in the foreseeable future, so consequently it is estimated that no additional sources will become subject to the standard over the next three years. Of the 355 total respondents, we estimate 299 respondents from the private sector (84 percent), 14 respondents from the state, local, or tribal governments (4 percent), and 42 respondents from the Federal government (12 percent).

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.” The overall change in burden found in this ICR reflect the provision changes, an update in the cost of labor, and corrections to the number of affected facilities found in EPA ICR number 2062.05.

The “Affected Public” is owners and operators of facilities that conduct site remediation activities, and includes respondents from the private sector, state, local and tribal government, as well as the Federal Government. 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) (Revised). 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) (Revised).

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 cause or contribute to air pollution that may reasonably be anticipated to endanger public health 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(s) 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 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

This ICR is related to proposed amendments to 40 CFR part 63, subpart GGGGG for the Site Remediation source category. Comments will be solicited on the proposal package and the proposed ICR.

3(c) Consultations

Over the next three years, an average of 69 facilities per year will become subject to the standard, with a total of 355 facilities subject to the standard during this period. In estimating the affected number of sources and the growth rate of Site Remediation facilities subject to this standard, we referenced the most recent ICR and used other resources to obtain the most recent data available. For the most recent ICR, we reviewed information available from the Online Tracking Information System (OTIS), which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

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 the standard 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. For site remediation performed at sites where the facility has been abandoned and there is no owner, a government agency takes responsibility for the cleanup.

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 for facilities where site remediation activities have been, or are currently being, conducted at some (but not all) facilities under a given code include: 325211, 325192, 325188, 32411, 49311, 49319, 48611, 42269, and 42271. 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.

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	63.7950(a), (c)
Notification of performance tests	63.7950(a), (d)
Notification of compliance status	63.7950(a), (e)
Performance test results	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)

Recordkeeping	
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.

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 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 providing information.
Train personnel to be able to respond to a collection of information.

Respondent Activities
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.
Conduct initial compliance determination.
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. 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

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. 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 in below Table 1: Annual Respondent Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Revised).

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, any 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 146,265 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	\$118.34 (\$56.35 + 110%)
Technical	\$60.46 (\$28.79 + 110%)
Clerical	\$39.12 (\$18.63 + 110%)

These labor rates are based on the May 2014 National Occupational Employment and Wage Estimates for the United States for Production Occupations (http://www.bls.gov/oes/current/oes_nat.htm#51-0000), occupational codes 51-8090 for miscellaneous plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical). The rates are the mean hourly wage, which 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)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)

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

It is estimated that there are no capital/startup costs for this ICR.

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 355 respondents. Of the 355 respondents, 286 are estimated to have monitors to maintain, and the O&M costs for the remaining 69 facilities are assumed to be negligible. The cost estimate includes \$494,496 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 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. Note the burden (both labor costs and O&M) to the Federal government respondents have been previously summarized in section 6(b).

The average annual Agency cost during the three years of the ICR is estimated to be \$305,791.

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 (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule/>). 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) (Revised).

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 23 additional respondents per year will become subject; therefore, the overall average number of respondents, as shown in the table below, is 332 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)	(E) Number of Respondents Submitting Reports (E=A+B+C-D)
1	15	286	8	0	309	301
2	15	309	8	0	332	316
3	14	332	9	0	355	330
Average					332	316

¹ New respondents include sources that become subject to the rule after removal of the RCRA/CERCLA exemption.

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 332.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Average Number of Respondents	(C) Number of Responses	(D) Average Annual Number of Respondents That Keep Records But Do Not Submit Reports	(E) Total (Average) Annual Responses E=(BxC)
Semiannual reports	316	2	8	632

Total Annual Responses				
			Total	632

The number of Total (Average) Annual Responses is 632.

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 146,265 hours at a cost of \$8,939,896. 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) (Revised).

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 6,585 labor hours at a cost of \$305,791. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Site Remediation (40 CFR Part 63, Subpart GGGGG) (Revised).

6(f) Reasons for Change in Burden

This rulemaking proposes to amend title 40, chapter I, part 63 subpart GGGGG by removing an exemption from the applicability provisions for site remediation activities performed under the authority of either RCRA or CERCLA. The overall changes in burden found in this ICR reflect an update in the cost of labor, an update to the number of affected facilities to include the facilities that will become subject to the rule with the removal of the RCRA/CERCLA exemption, corrections to errors found in EPA ICR number 2062.05.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 231 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.

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) (Revised)

Burden Item	(A) Person hours per occurrenc e	(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
Private Sector								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric Monitoring System ^c	40	1	40	0	0.0	0.0	0.0	0
4. Reporting requirements								
- Read instructions ^d	16	1	16	18.7	299.2	15.0	29.9	21,030
- Conduct performance test ^c	120	1	120	0	0.0	0.0	0.0	0
- Initial notification ^d	8	1	8	18.7	149.6	7.5	15.0	10,515
- Performance test notification ^c	2	1	2	0	0.0	0.0	0.0	0
- Initial compliance determination ^d	40	1	40	18.7	748.0	37.4	74.8	52,576
- Performance test report ^c	80	1	80	0	0.0	0.0	0.0	0
- Semiannual report ^e	40	2	80	269	21,520.0	1,076.0	2,152.0	1,512,619
- SSM report	8	0	0	0	0.0	0.0	0.0	0
Subtotal Reporting for Private Sector					26,124.3			1,596,741
5. Recordkeeping requirements								
- Read instructions ^d	40	1	40	18.7	748.0	37.4	74.8	52,576
- Plan activities ^f	100	1	100	13	1,300.0	65.0	130.0	91,376
- Prepare SSM plan ^g	80	1	80	0	0.0	0.0	0.0	0
- Prepare documentation for exempted sources ^h	80	1	80	5.7	456.0	22.8	45.6	32,052
- In-situ process vents parametric monitoring ⁱ	0.5	365	182.5	22.1	4,033.3	201.7	403.3	283,493
- Ex-situ process vents parametric monitoring ^j	0.5	365	182.5	221.9	40,496.8	2,024.8	4,049.7	2,846,476
- Inspect tank covers ^k	2	12	24	216.7	5,200.8	260.0	520.1	365,559
- Inspect container covers ^k	0.5	12	6	220.9	1,325.4	66.3	132.5	93,161

Burden Item	(A) Person hours per occurrenc e	(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
- Inspect surface impoundment covers ^l	2	12	24	4.2	100.8	5.0	10.1	7,085
- Inspect separator covers ^m	2	12	24	4.2	100.8	5.0	10.1	7,085
- Inspect transfer system covers ^k	0.5	12	6	220.9	1,325.4	66.3	132.5	93,161
- Leak detection and repair program ⁿ	100	1	100	8.5	850.0	42.5	85.0	59,746
- Develop record system ^f	100	1	100	13	1,300.0	65.0	130.0	91,376
- Enter information ^o	2	52	104	269	27,976.0	1,398.8	2,797.6	1,966,405
- Personnel training ^f	20	1	20	13	260.0	13.0	26.0	18,275
Subtotal Recordkeeping for Private Sector					98,294.2			6,007,826
Total for the Private Sector					124,418.5			7,604,567
State, Local or Tribal Government								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric Monitoring System ^c	40	1	40	0	0.0	0.0	0.0	0
4. Reporting requirements								
- Read instructions ^d	16	1	16	0	0.0	0.0	0.0	0
- Conduct performance test ^c	120	1	120	0	0.0	0.0	0.0	0
- Initial notification ^d	8	1	8	0	0.0	0.0	0.0	0
- Performance test notification ^c	0	1	0	0	0.0	0.0	0.0	0
- Initial compliance determination ^d	40	1	40	0	0.0	0.0	0.0	0
- Performance test report ^c	80	1	80	0	0.0	0.0	0.0	0
- Semiannual report ^e	40	2	80	14	1,120.0	56.0	112.0	78,724
- SSM report	8	0	0	0	0.0	0.0	0.0	0
Subtotal Reporting for State/Local/Tribal Government					1,288.0			78,724
5. Recordkeeping requirements								
- Read instructions ^d	40	1	40	0	0.0	0.0	0.0	0

Burden Item	(A) Person hours per occurrenc e	(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
- Plan activities ^f	100	1	100	0	0.0	0.0	0.0	0
- Prepare SSM plan ^g	80	1	80	0	0.0	0.0	0.0	0
- Prepare documentation for exempted sources ^h	80	1	80	0	0.0	0.0	0.0	0
- In-situ process vents parametric monitoring ⁱ	0.5	365	182.5	1.3	237.3	11.9	23.7	16,676
- Ex-situ process vents parametric monitoring ^j	0.5	365	182.5	12.7	2,317.8	115.9	231.8	162,912
- Inspect tank covers ^k	2	12	24	12.5	300.0	15.0	30.0	21,087
- Inspect container covers ^k	0.5	12	6	12.7	76.2	3.8	7.6	5,356
- Inspect surface impoundment covers ^l	2	12	24	0.2	4.8	0.2	0.5	337
- Inspect separator covers ^m	2	12	24	0.2	4.8	0.2	0.5	337
- Inspect transfer system covers ^k	0.5	12	6	12.7	76.2	3.8	7.6	5,356
- Leak detection and repair program ⁿ	100	1	100	0.5	50.0	2.5	5.0	3,514
- Develop record system ^f	100	1	100	0	0.0	0.0	0.0	0
- Enter information ^o	2	52	104	14	1,456.0	72.8	145.6	102,341
- Personnel training ^f	20	0	0	0	0.0	0.0	0.0	0
Subtotal Recordkeeping for State/Local/Tribal Government					5,201.5			317,917
Total for the State, Local or Tribal Government					6,489.5			396,641
Federal Government								
1. Applications	NA							
2. Surveys and Studies	NA							
3. Parametric Monitoring System ^c	40	1	40	0	0.0	0.0	0.0	0
4. Reporting requirements								
- Read instructions ^d	16	1	16	4.3	68.8	3.4	6.9	4,836
- Conduct performance test ^c	120	1	120	0	0.0	0.0	0.0	0
- Initial notification ^d	8	1	8	4.3	34.4	1.7	3.4	2,418
- Performance test notification ^c	0	1	0	0	0.0	0.0	0.0	0

Burden Item	(A) Person hours per occurrenc e	(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
- Initial compliance determination ^d	40	1	40	4.3	172.0	8.6	17.2	12,090
- Performance test report ^c	80	1	80	0	0.0	0.0	0.0	0
- Semiannual report ^e	40	2	80	32.4	2,592.0	129.6	259.2	182,189
- SSM report	8	0	0	0	0.0	0.0	0.0	0
Subtotal Reporting for Federal Government					3,297.3			201,533
5. Recordkeeping requirements								
- Read instructions ^d	40	1	40	4.3	172.0	8.6	17.2	12,090
- Plan activities ^f	100	1	100	1.7	170.0	8.5	17.0	11,949
- Prepare SSM plan ^g	80	1	80	0	0.0	0.0	0.0	0
- Prepare documentation for exempted sources ^h	80	1	80	2.7	216.0	10.8	21.6	15,182
- In-situ process vents parametric monitoring ⁱ	0.5	365	182.5	2.6	474.5	23.7	47.5	33,352
- Ex-situ process vents parametric monitoring ^j	0.5	365	182.5	26.4	4,818.0	240.9	481.8	338,652
- Inspect tank covers ^k	2	12	24	25.9	621.6	31.1	62.2	43,692
- Inspect container covers ^k	0.5	12	6	26.4	158.4	7.9	15.8	11,134
- Inspect surface impoundment covers ^l	2	12	24	0.5	12.0	0.6	1.2	843
- Inspect separator covers ^m	2	12	24	0.5	12.0	0.6	1.2	843
- Inspect transfer system covers ^k	0.5	12	6	26.4	158.4	7.9	15.8	11,134
- Leak detection and repair program ⁿ	100	1	100	1	100.0	5.0	10.0	7,029
- Develop record system ^f	100	1	100	1.7	170.0	8.5	17.0	11,949
- Enter information ^o	2	52	104	32.4	3,369.6	168.5	337.0	236,846
- Personnel training ^f	20	1	20	1.7	34.0	1.7	3.4	2,390
Subtotal Recordkeeping for Federal Government					12,059.5			737,086
Total for the Federal Government					15,356.8			938,618
Total Labor Burden and Cost (rounded)					146,265			8,939,826

Assumptions:

^a We have assumed there are approximately 355 respondents, with 286 existing sources and 69 additional sources becoming subject to the rule over the next three years (23 additional per year). The breakdown is as follows: 355 total respondents: 299 respondents from the private sector, 42 from the Federal government, and 14 from state, local or tribal governments.

^b This ICR uses the following labor rates: \$60.46 for technical, \$118.34 for managerial, and \$39.12 for clerical labor. These labor rates are based on the May 2014 National Occupational Employment and Wage Estimates for the United States for Production Occupations (http://www.bls.gov/oes/current/oes_nat.htm#51-0000), occupational codes 51-8090 for miscellaneous plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical). 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 there will be no respondents that will require a new parametric monitoring system or performance test.

^d We have assumed there will be 56 private sector facilities becoming subject to the rule over the next three years (18.7 per year); 0 state, local or tribal government facilities; and 13 Federal facilities becoming subject to the rule over the next three years (4.3 per year).

^e Assumes there will be 243 existing private sector facilities and 56 facilities private sector newly regulated by the rule, of which 39 (13 per year and an annual average of 26) of the newly regulated facilities will require semiannual reports for an annual average total of 269. Assumes there will be 14 existing state, local, or tribal government facilities that will submit semiannual reports. Assumes there will be 29 existing private sector facilities and 13 facilities private sector newly regulated by the rule, of which 5 (1.7 per year and an annual average of 3.4) of the newly regulated facilities will require semiannual reports for an annual average total of 32.4.

^f Assumes only newly regulated facilities required to submit semi-annual reports will perform this one-time activity.

^g Assumes no respondents will prepare an SSM plan.

^h Assumes 17 of the 56 (5.3 per year) newly regulated private sector facilities and 8 of the 13 (2.7 per year) newly regulated Federal facilities will meet a rule exemption.

ⁱ We have assumed that 26 out of the 286 existing respondents (9 percent) and none of the newly regulated facilities will use an on-site ex-situ treatment process. At each of these sites, it is assumed that a control device is required on the process vent.

^j We have assumed that it will take 0.5 hours 365 time per year to record parametric monitoring of ex-situ process vents. It is also assumed that out of 286 existing respondents, 90 percent or (260 respondents) and none of the newly regulated facilities will use an on-site ex-situ treatment process.

^k Based on information from previous ICR, assumes no newly regulated facilities will perform these activities.

^l We have assumed that it will take 2 hours once per month to inspect surface impoundments. It is assumed that 5 existing facilities and no newly regulated facilities use a surface impoundment in place of tanks.

^m We have assumed it will take 2 hours once per month to inspect separator covers. It is also assumed that 5 existing and no newly regulated sites will use oil-water separators.

ⁿ We have assumed that 10 existing and no newly regulated facilities will be implementing a LDAR program.

^o We have assumed that it will take 2 hours 52 times per year to enter information for facilities required to submit semiannual reports.

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

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 (\$) ^b
Report Review								
a. Initial notification	4	1	4	23	92	4.6	9.2	4,913
b. Performance test notification	2	1	2	1	2	0.1	0.2	107
c. Initial compliance determination	24	1	24	23	552	27.6	55.2	29,479
d. Performance test reports	24	1	24	1	24	1.2	2.4	1,282
e. Semiannual report	8	2	16	316	5,056	252.8	505.6	270,011
Total Annual Burden and Cost (rounded)						6,585		\$305,791

Assumptions:

^a We have assumed that there are approximately 355 respondents, with 286 existing sources and 69 additional sources becoming subject to the rule over the next three years (23 per year). We have also assumed 24 of the additional sources will not be required to submit semiannual reports (annual average of 316 from 286 existing sources plus an average of 15 additional sources per year for 3 years) and that no existing sources and 3 additional sources (1 per year) will require a performance test.

^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.