

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (Renewal),
EPA ICR Number 1659.09, OMB Control Number 2060-0325.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) were proposed on February 8, 1994, promulgated on December 14, 1994, and most-recently amended on February 28, 1997. The updated direct final standards promulgated on February 28, 1997 implemented a proposed settlement with the American Petroleum Institute (API). These regulations apply to existing and new bulk gasoline terminals with throughputs greater than 75,700 liters/day. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart R.

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.

All of the bulk gasoline terminals are owned and operated by the gasoline distribution industry (aka: the "Affected Public"). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (Renewal).

Over the next three years, approximately 102 respondents (87 bulk terminals and 15 pipeline breakout stations) are deemed major sources of hazardous air pollutant (HAP) and are subject to the standards this Subpart. No additional respondents per year will become subject to these same standards. In addition, there are a total of 1,560 area sources (i.e., 1,100 bulk gasoline terminal and 460 pipeline breakout stations), of which 25 percent (i.e., 390) will be within 50 percent of major source threshold criteria, who will be required to conduct an annual certification testing.

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, benzene and other HAP emissions from gasoline distribution facilities 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 R.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 that these same standards 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.

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

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

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 associations 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: 1) the American Petroleum Institute, at (202) 682-8000; and 2) SC Fuels, at (800) 677-4834. API reviewed the ICR supporting statement and did not have substantial feedback.

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 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 major sources that transfer and store gasoline, including pipeline breakout stations and bulk terminals. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard may be found in the following table:

Standard (60 CFR Part 63, Subpart R)	SIC Codes	NAICS Codes
General Warehousing and Storage	4225, 4226	493110
Deep Sea, Coastal, and Great Lakes Water Transportation	4412, 4481, 4424, 4432, 4481, 4482	48311
Other Chemical and Allied Products Merchant Wholesalers	5169	424690
Fuel Dealers	5171, 5984, 5989	454310
Petroleum Bulk Stations and Terminals	5171	424710
Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)	5172	424720

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R).

A source must make the following reports:

Notifications/Reports	
Notification of facility subject to relevant standard	63.9(b)(2)
Notification of anticipated construction or reconstruction of a source subject to the relevant standard	63.9(b)(5)
Notification of construction or reconstruction	63.9(b)(4)-(5)
Notification of the actual date of startup	63.9(b)(4)(v)
Notification of performance tests	63.7(b), 63.9(e)

Notifications/Reports	
Notification of installation of a new control device or reconstruction of an existing control device	63.5(b)(6), 63.5(d)(1)
A request for an extension of compliance report	63.9(c)
Report of the annual inspections of storage vessels	63.428(d), 60.115b
Semiannual compliance reports	63.428(g), 63.10(d)
Annual reports stating non-applicability of the regulation are required from area sources within 50 percent of the major source threshold	63.428(i)

A source must keep the following records:

Recordkeeping	
Maintain records of monthly visual inspection data on gasoline transfer and vapor collection and processing equipment	63.428(e) and (f)
Maintain and updated records on cargo tank vapor tightness	63.428(b)
Maintain records of the annual inspections of storage vessels	63.428(d), 60.115b
Continuously monitor and record operating parameter monitoring data	63.428(c)(1)
Records are required to be retained for 5 years	63.10(b), 63.428(d)

Electronic Reporting

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

(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 control device.
Perform initial performance test, Reference Method 21 and 27 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.

Respondent Activities
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.

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 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 number of small entities potentially subject to the requirements of this ICR is estimated to be 56 percent of the respondent universe; however, finer and more-complete data would probably result in a substantial reduction in the number of firms classified as small. This estimate is based on the discussion of small business impacts during the development of the rule (see BID EPA-453/R-94-002a January 1994, pages 8-84 through 8-87).

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 below in Table 1: Annual Respondent Burden and Cost – NESHP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 neither conduct nor 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 15,900 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 monitor(s) 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)
CMS for pressure drop and liquid supply pressure	N/A	0	\$0	\$3,500	102	\$357,000

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 \$357,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$357,000. 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 \$65,400.

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 Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 102 existing respondents (87 bulk gasoline terminals and 15 pipeline breakout stations) will be subject to these standards. We have further estimated that there are total of 1,560 area sources (i.e., 1,100 bulk gasoline terminals and 460 pipeline breakout stations), of which 25 percent will be within 50 percent of major source threshold criteria (i.e., 390) and will be required to conduct an annual certification testing. 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 492 per year (102 + 390 = 492).

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		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents ²	(C) Number of Existing Respondents that keep records but do not submit reports ³	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	61.2	431	0	492.2
2	0	61.2	431	0	492.2
3	0	61.2	431	0	492.2
Average	0	61.2	431	0	492

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

² 60 percent of the sources (i.e. 61 respondents) would be required to submit semiannual reports under the NESHAP Subpart R.

³ This estimate includes 41 major sources, or 40 percent of the 102 respondents, that are currently subject to NSPS reporting requirements equivalent to the Bulk Gasoline Terminal NSPS (40 CFR Part 60, Subpart XX) for bulk terminals and the VOL storage NSPS (40 CFR Part 60, Subparts K, Ka, Kb) or storage tank CTG's for pipeline breakout stations. It also includes recordkeeping for 390 area sources.

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 492.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Initial performance test report	0	1	N/A	0
Semiannual reports	61.2	2	386	508.4
			Total	508

Note: We estimate 60 percent of the major sources (i.e. 61.2 respondents) would be required to submit semiannual reports under the NESHAP Subpart R.

The number of Total Annual Responses is 508.

The total annual labor costs are \$1,640,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 15,900. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 31 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$357,000. 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 1,410 labor hours at a cost of \$65,400. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (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 increase in the total estimated burden as currently identified in the

OMB Inventory of Approved Burdens. This increase is not due to any program changes. The small change in the burden and cost estimates occurred because of a change in assumption. This ICR assumes all sources will have to familiarize with the regulatory requirements each year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 31 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 neither conduct nor 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-2012-0662. 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-2012-0662 and OMB Control Number 2060-0325 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 Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (Renewal)

Burden Items	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor costs per Year (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	1	1	1	102	102	5.1	10.2	\$12,102.15
B. Required Activities								
a. Initial performance test ^d	175	1	175	0	0	0	0	\$0
b. Repeat of performance test ^d	175	1	175	0	0	0	0	\$0
c. Storage tank seal/seal gap inspections tanks certification ^e	16	1	16	51	816	40.8	81.6	\$96,817.18
d. Annual testing certification of area source compliance status ^f	1	1	1	390	390	19.5	39	\$46,272.92
C. Create Information	See 3B							
D. Gather Existing Information	See 3B							
E. Write Report ^d								
a. Notification of applicability	3	1	3	0	0	0	0	\$0
b. Notification of construction/reconstruction/modification	2	1	2	0	0	0	0	\$0
c. Notification of actual startup	2	1	2	0	0	0	0	\$0
d. Notification of performance test	2	1	2	0	0	0	0	\$0
e. Notification of CEMS	2	1	2	0	0	0	0	\$0

performance evaluation								
f. Notification of area source compliance status	1	1	1	0	0	0	0	\$0
g. Report of performance test	See 3B							
h. Semiannual compliance reports bulk terminals major sources ^g	10	2	20	52.2	1,044	52.2	104.4	\$123,869.03
i. Semiannual compliance reports pipeline breakout major sources ^g	8	2	16	9	144	7.2	14.4	\$17,085.38
Subtotal for Reporting Requirements						2,870		\$296,147
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan Activities	See 3B&4C							
C. Implement Activities								
a. Gasoline terminals:								
b. File cargo tank inspection records ^h	0.5	26	13	61.2	795.6	39.78	79.56	\$94,396.75
c. Update cargo tank inspection records ^h	6	1	6	61.2	367.2	18.36	36.72	\$43,567.73
d. Cross-check cargo tank inspection file ^h	6	26	156	61.2	9,547.2	477.36	954.72	\$1,132,760.96
e. Pipeline breakout stations	See 3B							
D. Develop Record System ⁱ	8	1	8	0	0	0	0	\$0
E. Time to Enter Information								
a. Record equipment subject to visual inspection requirements at pipeline breakout stations	1	1	1	0	0	0	0	\$0
b. Record equipment leaks data at bulk terminals	0.1	4	0.4	87	34.8	1.74	3.48	\$4,128.97
c. Record equipment leaks data at pipeline breakout stations	0.1	12	1.2	15	18	0.9	1.8	\$2,135.67
d. Record storage tank seal inspection results	1	1	1	51	51	2.55	5.1	\$6,051.07

e. Records of startups, shutdowns, malfunctions, etc.	1	4	4	51	204	10.2	20.4	\$24,204.29
f. Area source recordkeeping ^j	0.25	1	0.25	390	97.5	4.88	9.75	\$11,568.23
F. Time to train personnel	1	1	1	102	102	5.1	10.2	\$12,102.15
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit information	See 4E							
I. Time for audits ^k	N/A							
a. Bulk gasoline terminals	6	1	6	22	132	6.6	13.2	\$15,661.60
b. Pipeline breakout stations	4	1	4	4	16	0.8	1.6	\$1,898.38
Subtotal for Recordkeeping Requirements						13,070		\$1,348,476
TOTAL ANNUAL BURDEN AND COST (rounded)^l						15,900		\$1,640,000
CAPITAL AND O&M COST (rounded)^l								\$357,000
GRAND TOTAL (rounded)^l								\$2,000,000

Assumptions:

^a We have estimated that there are 102 respondents, comprised of 87 bulk terminals and 15 pipeline breakout stations, which are major sources of HAPs subject to this NESHAP. We have also estimated that no new respondents will become subject to the regulation in the next three years.

^b This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 per hour for Technical labor, and \$52.77 per hour for Clerical labor. 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.

^c We have assumed that all respondents will have to familiarize with the regulatory requirements each year.

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

^e Performance tests are required for vapor processing and collection systems: Method 27 for pressure, Method 21 for leak detection testing at cargo tanks. Annual certification test for cargo tanks using Methods 21 and 27 is required. However, we have assumed that 50 percent of the respondents that are major sources are currently subject to test requirements equivalent to the requirements of Bulk Gasoline Terminal NSPS (40 CFR Part 60, Subpart XX) and Volatile Organic Liquid (VOL) storage NSPS (40 CFR Part 60, Subparts K, Ka, and Kb) or the storage tank EPA Control Technique Guidelines (CTG) for pipeline breakout stations.

^f We have estimated that there is a total of 1,560 area sources (i.e., 1,100 bulk gasoline terminal and 460 pipeline breakout stations), of which 25 percent will be within 50 percent of major source threshold criteria (i.e., 390) and will be required to submit conduct an annual certification testing.

^g Respondents that are major sources of HAPs (i.e., 87 bulk terminals and 15 pipeline breakout stations) are required to submit semiannual compliance reports. We have assumed that 60 percent of the sources (i.e., 61.2 respondents, comprised of 52.2 bulk terminals and 9 pipeline breakout stations) would be required to submit semiannual reports under the NESHAP Subpart R since the remaining 40 percent are already complying with similar reporting requirements under NSPS reporting requirements equivalent to the Bulk Gasoline Terminal NSPS (40 CFR Part 60, Subpart XX) for bulk terminals and the VOL storage NSPS (40 CFR Part 60, Subparts K, Ka, and Kb) or storage tank CTG's for pipeline breakout stations.

^h We have assumed that 60 percent of the 102 respondents (i.e., 61.2) are required to maintain cargo tank implementation files.

ⁱ We have assumed that respondents already have the technology and recordkeeping systems in place to monitor its daily operations and to comply with existing regulations.

^j We have assumed that 25 percent of area source facilities (i.e., 390) will be required to keep annual records of their area source status using the screening equation.

^k We have assumed that 25 percent of respondents (i.e., 22 bulk terminals and 4 pipeline breakout stations) will conduct audits.

^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 Gasoline Distribution Facilities (40 CFR Part 63, Subpart R) (Renewal)

Activity	(A) EPA Hours per Occurrence hours	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technic al Hours per Year (E=CxD)	(F) Managem ent Hours per Year (F=E \times 0.05)	(G) Clerical Hours per Year (G=E \times 0.1)	(H) Costs per Year (\$) ^b
Report Review								
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of compliance status	10	0	0	0	0	0	0	\$0
Notification of applicability	2	0	0	0	0	0	0	\$0
Notification of performance test ^c	2	0	0	0	0	0	0	\$0
Notification of CEMS performance evaluation	2	0	0	0	0	0	0	\$0
Notification of compliance status	4	0	0	0	0	0	0	\$0
Semiannual compliance reports ^d	10	2	20	61.2	1,224	61.2	122.4	\$65,366.50
TOTAL ANNUAL BURDEN (rounded) ^e					1,410			\$65,400

Assumptions:

^a We have estimated that there are 102 respondents, including 87 bulk terminals and 15 pipeline breakout stations which are major sources of HAPs, subject to NESHAP Subpart R. We have further estimated that there are total of 1,560 area sources (i.e., 1,100 bulk gasoline terminal and 460 pipeline breakout stations), of which 25 percent (i.e., 390) would be certifying annually that they are below the cutoff value for rule applicability.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 for Managerial (GS-13, Step 5, \$40.10 x 1.6), \$47.62 for Technical (GS-12, Step 1, \$29.76 x 1.6) and \$25.76 Clerical (GS-6, Step 3, \$16.10 x 1.6). These rates are from the Office of Personnel Management (OPM) "2016 General Schedule" which excludes locality rates of pay.

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

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

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