

Total Hours and Cost

	<i>Number of Respondents</i>	<i>Total Number of Responses per Year</i>	<i>Total Hours/Year</i>	<i>Total Cost/Year</i>
Rin Generators	7,603	812,932	222,219	22,824,339
Obligated Parties	5,538	815,862	187,160	18,504,024
RIN Owners	5,227	930,841	208,355	20,631,399
Exporters	1,164	158,642	35,835	3,543,965
QAP Providers	48	8,131	1,196	161,839
Petition Agg Compliance	1	1	200	18,600
Total	19,581	2,726,409	654,965	65,684,166

Annual Respondent Burden and Cost by Type of Party

Table 1 - RIN Generators (Assuming 595 Producers and 131 Importers of Renewable Fuels, for a total of 726 RIN Generators)

Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
§80.1430	Recordkeeping: Retain Export Affidavits related to QAP	0.25	0	0	23.25	110	12	1320	330	30690	CBP
§80.1450(b), 80.76	Registration: Overhead, basic information - new registrants	0.75	0.00	0.00	70	37	1	37	28	2,581	OTAQREG INSTRUCTIONS
§80.1450(b), 80.1452(a)	Registration: Set up account in CDX, EMTS - new registrants	1.00	0.00	0.00	93	37	1	37	37	3,441	OTAQREG INSTRUCTIONS
§80.1450(b)(1)(i)-(xv)	Registration: Information to specific products or processes including provisions of certain plans (e.g. MSW separation plan) or processes (e.g. affidavits) - <i>new producers</i>	1.00	0.00	0.00	93	30	1	30	30	2,790	OTAQREG INSTRUCTIONS
§80.1450(b)	Registration: Engineering Review for Initial Registrants - <i>new producers</i>	6.00	0.00	48.00	9,486	30	1	30	1,620	284,580	OPTIONAL ENGINEERING REVIEW TEMPLATE
§80.1450(d)	Registration: Updates to existing registrations (as needed when information changes)	0.75	0.00	0.00	70	37	1	37	28	2,581	OTAQREG INSTRUCTIONS
§80.1450(d)	Registration: Updates to existing engineering reviews (every three years) - <i>1/3 of existing producers each year</i>	2.00	0.00	16.00	3,162	198	1	198	3,564	626,076	OPTIONAL ENGINEERING REVIEW TEMPLATE
§80.1451(b)	Reporting: Quarterly RFS Activity Report (4x/yr.)	1.00	0.00	0.00	93	726	4	2,904	2,904	270,072	RFS0104: RFS ACTIVITY REPORT/URF

§80.1451(b)	Reporting: Quarterly RFS Renewable Fuel Producer Supplemental Report (4x/year, as needed); producers only	0.50	0.00	0.00	47	60	4	240	120	11,160	RFS0601: RFS RENEWABLE FUEL PRODUCER SUPPLEMENTAL REPORT/UR F
§80.1451(b)	Reporting: Quarterly Co-Products Report (4x/year)	0.50	0.00	0.00	47	726	4	2,904	1,452	135,036	RFS0701: RFS RENEWABLE FUEL PRODUCER CO- PRODUCTS REPORT/UR F
§80.1451(b)	Reporting: Quarterly Renewable Biomass Report (4x/year)	0.50	0.00	0.00	47	37	4	148	74	6,882	RFS0801: RFS RENEWABLE BIOMASS REPORT/UR F
§80.1449	Reporting: Annual Production Outlook Report	1.00	0.00	0.00	93	595	1	595	595	55,335	RFS0901: RFS PRODUCTION OUTLOOK REPORT/UR F
§80.1451(b)	Reporting: Quarterly reporting for fuels under 80.1451(b)(i)(ii)(T)	1.00	0.00	0.00	93	10	4	40	40	3,720	RFS1400: REPORTING FUELS UNDER 80.1451(B) (1)(ii)(T)/UR F

§80.1451(b)	Reporting: Quarterly reporting for fuels under 80.1451(b)(i)(ii) (T)	1.00	0.00	0.00	93	10	4	40	40	3,720	RFS1500: REPORTING FUELS UNDER 80.1451(B) (1)(ii)(T) - FINISHED BIOFUEL BLENDING/ URF
§80.1451(b)	Reporting: Quarterly reporting for fuels under 80.1451(b)(i)(ii) (T)	1.00	0.00	0.00	93	10	4	40	40	3,720	RFS1600: REPORTING FUELS UNDER 80.1451(B) (1)(ii)(T) - BLENDER CONTRACT/ URF
§80.1451(b)	Reporting: EPP Reporting (4x/year) - producers	3.00	0.00	0.00	279	60	4	240	720	66,960	RFS2500: RFS EFFICIENT PRODUCER QUESTIONNAIRE/URF
§80.1451(b)	Reporting: Cellulosic Biofuels (D3, D7) annual reporting (1x/year)	3.00	0.00	0.00	279	73	1	73	219	20,367	RFS2700: RFS CELLULOSIC BIOFUEL PRODUCER QUESTIONNAIRE/ URF
§ 80.1452	Reporting: RIN Assignment/Transactions	0.50	0.00	0.00	47	726	365	264,990	132,495	12,322,035	w/in EMTS
§80.1452	Reporting: RFS RIN Transaction Report - download from EMTS quarterly and submit	0.50	0.00	0.00	47	726	4	2,904	1,452	135,036	DOWNLOADED FROM EMTS

\$80.1452	Reporting: EMTS RFS RIN Generation Report (4x/year)	0.50	0.00	0.00	47	726	4	2,904	1,452	135,036	DOWNLOADED FROM EMTS
\$80.1416	Reporting: Petitions for evaluation of new renewable fuels pathways, including overhead information, description and technical information, and other relevant information.	16.00	0.00	0.00	1,488	4	1	4	64	5,952	NO FORM
\$80.1464	Reporting: Attest Engagements (annual)	8.00	0.00	24.00	5,208	726	1	726	23,232	3,781,008	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1466	Reporting: Submission of information regarding independent third party, credentials, etc. for approval - <i>new RIN-generating foreign producers and importers</i>	0.50	0.00	8.00	1,535	37	1	37	315	56,777	NO FORM
\$80.1466	Reporting: Independent third party reports to accompany PTDs - <i>for RIN-generating foreign producers and importers</i>	0.00	0.00	1.00	186	73	12	876	876	162,936	NO FORM
\$80.1469(c)	Recordkeeping: Quarterly auditor paperwork review (related to QAP) - <i>producers</i>	40.00	0.00	0.00	3,720	112	4	448	17,920	1,666,560	CBP
\$80.1472	Recordkeeping: Auditor site visits for QAP	10.00	0.00	0.00	930	112	2	224	2,240	208,320	CBP
\$80.1474	Reporting: Remedial actions related to QAP and invalid RINs	8.00	0.00	0.00	744	40	1	40	320	29,760	w/in EMTS and/or update to RFS0104 or other underlying form.

80.1474	Reporting: Potentially invalid RIN demonstration	1.00	0.00	0.00	93	10	1	10	10	930	NO FORM
80.1466	Recordkeeping: Designation, PTD, and load port requirements for RIN-generating foreign producers and importers	4.00	0.00	0.00	372	73	12	876	3,504	325,872	CBP
80.1453	Recordkeeping: PTD Requirements when party transfers ownership of neat/blended renewable fuels	0.05	0.00	0.00	5	726	365	264,990	13,250	1,232,204	CBP
80.1454(b), 1464	Recordkeeping: Retention of records (PTDs, copies of registration, copies of reports, records related to RIN generation, etc.)	0.05	0.00	0.00	5	726	365	264,990	13,250	1,232,204	CBP
GRAND TOTAL						7,603		812,932	222,219	22,824,339	

Assumes:

We used the actual number of registered parties for the basic assumptions.

For new registrants, we assume 5% of the appropriate total number of currently registered. It is difficult to estimate the exact number, although this benchmark seems close in our experience.

For updates to existing registration, we assume 10%.

For Lines 22, 34, and 35, we have returned to the original RFS ICR assumption that daily means calendar days (365) instead of business days (260). These are marked in salmon highlight.

Lines 34 and 35 split PTDs into general PTD use requirements and retention, the total of these is 0.1 hour.

We have broken the QAP specific items out from recordkeeping and reporting. Lines 5, 17-19, and 29-32 reflect this break out. These are in light blue color coded rows.

Annual Respondent Burden and Cost by Type of Party

Table 2 - Obligated Parties (Refiners/Importers of Non-Renewable Gasoline and Diesel Fuel, assumes 457 refiners plus 281 importers, total of 738 obligated parties)

Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
\$80.1450, 80.76	Registration: Overhead, basic information - new registrants	1.50	0.00	0.00	140	37	1	37	56	5,162	OTAQREG INSTRUCTIONS
\$80.1450, 80.1452(a)	Registration: Set up account in CDX, EMTS - new registrants	1.00	0.00	0.00	93	37	1	37	37	3,441	OTAQREG INSTRUCTIONS
\$80.1450(d)	Registration: Updates to existing registrations (as needed when information changes)	0.75	0.00	0.00	70	74	1	74	56	5,162	OTAQREG INSTRUCTIONS
\$80.1451	Reporting: invalid RIN retirement reporting (as needed)	1.00	0.00	0.00	93	150	1	150	150	13,950	w/in EMTS and/or update to RFS0104 or other underlying form.
\$80.1451	Reporting: Quarterly RFS Activity Report (4x/yr.)	1.00	0.00	0.00	93	738	4	2,952	2,952	274,536	RFS0104: RFS ACTIVITY REPORT/URF
\$80.1451	Reporting: RFS Annual Compliance Report (1x/year)	6.00	0.00	0.00	558	738	1	738	4,428	411,804	RFS0303: RFS ANNUAL COMPLIANCE REPORT/URF
\$ 80.1452	Reporting: RIN Transactions)	0.50	0.00	0.00	47	738	365	269,370	134,685	12,525,705	w/in EMTS
\$80.1452	Reporting: RFS RIN Transaction Report - download from EMTS quarterly and submit	0.50	0.00	0.00	47	738	4	2,952	1,476	137,268	DOWNLOADED FROM EMTS
\$80.1474	Reporting: Potentially Invalid RIN demonstrations and remedial actions (as needed)	2.00	0.00	0.00	186	74	1	74	148	13,764	NO FORM

											USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1464	Reporting: Attest Engagements (annual)	6.00	0.00	16.00	3,534	738	1	738	16,236	2,608,092	
\$80.1453	Recordkeeping: General PTD Requirements	0.05	0.00	0.00	5	738	365	269,370	13,469	1,252,571	CBP
\$80.1454(b)	Recordkeeping: Specific requirements for retention of records (PTDs, copies of registration, copies of reports) (daily)	0.05	0.00	0.00	5	738	365	269,370	13,469	1,252,571	CBP
GRAND TOTAL						5,538		815,862	187,160	18,504,024	

Assumes:

We used the actual number of registered parties for the basic assumptions.

For new registrants, we assume 5% of the appropriate total number of currently registered. It is difficult to estimate the exact number, although this benchmark seems close in our experience.

For updates to existing registration, we assume 10%. We also assume that 10% of registrants may have potentially invalid RIN reporting requirements.

For Lines 11, 15, and 16, we have returned to the original RFS ICR assumption that daily means calendar days (365) instead of business days (260). These are marked in salmon highlight.

Lines 15 and 16 split PTDs into general PTD use requirements and retention, the total of these is 0.1 hour.

We have broken the QAP specific items out from recordkeeping and reporting. Lines 8 and 13 reflect this break out. These are in light blue color coded rows.

Annual Respondent Burden and Cost by Type of Party

Table 3 - RIN Owners (Assumes 843 RIN Owners)

Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
\$80.1450, 80.76	Registration: Overhead, basic information - <i>new registrants</i>	0.50	0.00	0.00	47	42	1	42	21	1,953	OTAQREG INSTRUCTIONS
\$80.1467	Registration: Applications (<i>new</i>) for foreign RIN owners	8.00	0.00	0.00	744	1	1	1	8	744	OTAQREG INSTRUCTIONS
\$80.1450, 80.1452(a)	Registration: Set up account in CDX, EMTS - <i>new registrants</i>	1.00	0.00	0.00	93	42	1	42	42	3,906	OTAQREG INSTRUCTIONS
\$80.1450(d)	Registration: Updates to existing registrations (as needed when information changes)	0.75	0.00	0.00	70	84	1	84	63	5,859	OTAQREG INSTRUCTIONS
\$80.1451	Reporting: Quarterly RFS Activity Report (4x/yr.)	1.00	0.00	0.00	93	843	4	3,372	3,372	313,596	RFS0104: RFS ACTIVITY REPORT/URF
\$ 80.1452	Reporting: RIN Transactions	0.50	0.00	0.00	47	843	365	307,695	153,848	14,307,818	w/in EMTS
\$80.1451	Reporting: RFS RIN Transaction Report - download from EMTS quarterly and submit	0.50	0.00	0.00	47	843	4	3,372	1,686	156,798	DOWNLOADED FROM EMTS
\$80.1464	Reporting: Attest Engagements (annual)	6.00	0.00	16.00	3,534	843	1	843	18,546	2,979,162	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1453	Recordkeeping: General PTD Requirements (daily)	0.05	0.00	0.00	5	843	365	307,695	15,385	1,430,782	CBP

	Recordkeeping: Retention of records (PTDs, copies of registration, copies of reports) (daily)										CBP
\$80.1464		0.05	0.00	0.00	5	843	365	307,695	15,385	1,430,782	
GRAND TOTAL						5,227		930,841	208,355	20,631,399	

Assumes:

We used the actual number of registered parties for the basic assumptions.

For new registrants, we assume 5% of the appropriate total number of currently registered. It is difficult to estimate the exact number, although this benchmark seems close in our experience.

For updates to existing registration, we assume 10%.

For Lines 10, 13, and 14, we have returned to the original RFS ICR assumption that daily means calendar days (365) instead of business days (260). These are marked in salmon highlight.

Lines 13 and 14 split PTDs into general PTD use requirements and retention, the total of these is 0.1 hour.

Annual Respondent Burden and Cost by Type of Party

Table 4 - Exporters (Assumes 142 Exporters)

Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/ Response	Clerical Only Hours/ Response	Purchased Services Hours/ Response	Total Cost/ Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/ Year	Total Cost/Year	
\$80.1450, 80.76	Registration: Overhead, basic information - new registrants	0.75	0.00	0.00	70	7	1	7	5	488	OTAQREG INSTRUCTIONS
\$80.1450, 80.1452(a)	Registration: Set up account in CDX, EMTS - new registrants	1.00	0.00	0.00	93	7	1	7	7	651	OTAQREG INSTRUCTIONS
\$80.1450(d)	Registration: Updates to existing registrations (as needed when information changes)	0.75	0.00	0.00	70	14	1	14	11	977	OTAQREG INSTRUCTIONS
\$80.1451	Reporting: Quarterly RFS Activity Report (4x/yr.)	1.00	0.00	0.00	93	142	4	568	568	52,824	RFS0104: RFS ACTIVITY REPORT/URF
\$80.1451	Reporting: RFS Annual Compliance Report (1x/year)	4.00	0.00	0.00	372	142	1	142	568	52,824	RFS0303: RFS ANNUAL COMPLIANCE REPORT/URF
\$ 80.1452	Reporting: RIN Transactions	0.50	0.00	0.00	47	142	365	51,830	25,915	2,410,095	w/in EMTS
\$80.1452	Reporting: RFS RIN Transaction Report - download from EMTS quarterly and submit	0.50	0.00	0.00	47	142	4	568	284	26,412	DOWNLOADED FROM EMTS
\$80.1464	Reporting: Attest Engagements	6.00	0.00	16.00	3,534	142	1	142	3,124	501,828	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
\$80.1453	Recordkeeping: PTD Requirements	0.05	0.00	0.00	5	142	365	51,830	2,592	241,010	CBP

\$80.1454	Recordkeeping: retention of exporter affidavit, separated out for QAP	0.10	0.00	0.00	9	142	12	1,704	170	15,847	CBP
\$80.1454	Recordkeeping: Retention of records (PTDs, copies of registration, copies of reports)	0.05	0.00	0.00	5	142	365	51,830	2,592	241,010	CBP
GRAND TOTAL						1,164		158,642	35,835	3,543,965	

Assumes:

We used the actual number of registered parties for the basic assumptions.

For new registrants, we assume 5% of the appropriate total number of currently registered. It is difficult to estimate the exact number, although this benchmark seems close in our experience.

For Lines 10, 13, and 15, we have returned to the original RFS ICR assumption that daily means calendar days (365) instead of business days (260). These are marked in salmon highlight.

Lines 14 and 15 split PTDs into general PTD use requirements and retention, the total of these is 0.1 hour.

We have broken the QAP specific items out from recordkeeping and reporting. Line 14 reflects exporter records related to QAP. These are in light blue color coded rows.

Annual Respondent Burden and Cost by Type of Party											
Table 5 - QAP Providers (Assumes 4 QAP Providers)											
Information Collection Activity		Hours and Cost				Total Hours and Cost					Applicable Forms
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
§80.1450(g)	Registration: Overhead, basic information, association of accounts in OTAQREG - new registrants	20.00	0.00	0.00	1,860	1	1	1	20	1,860	OTAQREG INSTRUCTIONS
§80.1450(g)	Registration: association with RIN Generator	0.20	0.00	0.00	19	1	1	1	0	19	OTAQREG INSTRUCTIONS
§80.1450(g)	Registration: renewals for QAP auditors	13.00	0.00	0.00	1,209	4	1	4	52	4,836	OTAQREG INSTRUCTIONS
§80.1450(g)	Registration: Updates to existing registrations (as needed when information changes)/renewals	16.00	0.00	0.00	1,488	1	1	1	16	1,488	OTAQREG INSTRUCTIONS
§80.1451	Reporting: Batch Verification (4x/year)	4.00	0.00	0.00	372	4	4	16	64	5,952	RFS2000: BATCH VERIFICATION/URF
§80.1451(g)	Reporting: Aggregate RIN Verification (4x/year)	2.00	0.00	0.00	186	4	4	16	32	2,976	RFS2100: AGGREGATE RIN VERIFICATION/URF
§80.1451(g)	Reporting: On-Site Audit Report (4x/year)	4.00	0.00	0.00	372	4	4	16	64	5,952	RFS2200: ON-SITE AUDIT REPORT/URF
§80.1451(g)	Reporting: Mass Balance	6.00	0.00	24.00	5,022	4	4	16	480	80,352	RFS2400: MASS BALANCE/URF
§80.1454*	Recordkeeping: Retain records underlying QAP	0.01	0.00	0.00	1	4	2,000	8,000	80	7,440	CBP
§80.1464**	Reporting: ATTEST ENGAGEMENT	0.00	0.00	40.00	7,440	4	1	4	160	29,760	USER GUIDE TO OTAQREG FOR ATTEST ENGAGEMENTS FOR THE RFS
§80.1469 [e], (g)	Reporting: Initial QAP Submission	40.00	0.00	0.00	3,720	4	1	4	160	14,880	NO FORM
§80.1469(f)	Reporting: QAP Updates (occasional)	2.00	0.00	0.00	186	4	4	16	32	2,976	NO FORM
§80.1474	Reporting: Potentially Invalid RINs (4x/year)	1.00	0.00	0.00	93	5	4	20	20	1,860	RFS2300: LIST OF POTENTIALLY INVALID RINS
§80.1474	Reporting: PIR NOTIFICATION & FOLLOW UP	1.00	0.00	0.00	93	4	4	16	16	1,488	NO FORM
GRAND TOTAL						48		8,131	1,196	161,839	

NOTES: Items in this table have been broken out further, to mirror the expiring QAP ICR.

The expiring QAP ICR assumed a much higher number of QAP providers than have chosen to participate in the program.

There are currently four registered QAP providers, only two of which are engaged in providing services.

We do not anticipate an increase in the number of QAP providers, but have provided an estimate for one new registrants per year in Lines 5-6.

Also of note:

*Line 13 has been updated to restore the individual response assumptions that were used in the expiring QAP ICR, rather than to provide a generic recordkeeping burden.

**Line 14 was erroneously folded in to Table I and has been broken back out again on the correct table and the expiring QAP ICR assumption of 40 hours accepted.

Annual Respondent Burden and Cost by Type of Party

Table 6 - Petitions for Aggregate Compliance Approach

Information Collection Activity		Hours and Cost				Total	
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year
\$80.1457	Reporting: Petitions for Aggregate Compliance Approach for Foreign Countries	200.00	0.00	0.00	18,600	1	1
GRAND TOTAL						1	

Assumes,:

One petition per year. It is unusual to receive even that number.

I Hours and Cost			Applicable Forms
<i>Total Number of Responses per Year</i>	<i>Total Hours/Year</i>	<i>Total Cost/Year</i>	
1	200	18,600	NO FORM
1	200	18,600	

Labor Costs				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour^a</i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial	57.2	115	0.05	5.75
Technical/Professional	52.99	106	0.7	74.2
Clerical	16.03	33	0.2	6.6
Legal	57.25	115	0.05	5.75
Total Employer Cost/hour				93
Purchased Services^b				186

^a Overhead is calculated to be equal to the cost of labor.

^b The cost of purchased services (for example, cost of attest auditors) is calculated at twice the Employer Cost. This figure makes for an easily understandable estimate, and matches feedback received from industry on the actual cost of such services.

The estimates used the Bureau of Labor Statistics figures from "National Industry-Specific Occu
These were the most recent estimates available at the time of development of the 1st Federal

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Register notice and were the ones reviewed by industry commenters.