

Table 1: Annual Respondent Burden and Cost – NESHAP for Gasoline Distribution Facilities (4

Burden Items	(A)	(B)	(C)	(D)
	Respondent Hours per Occurrence	Number of Occurrences per Respondent per Year	Hours per Respondent per Year	Number of Respondents per Year ^a
			(C=AxB)	
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with regulatory requirements ^c	1	1	1	102
B. Required Activities				
a. Initial performance test ^d	175	1	175	0
b. Repeat of performance test ^d	175	1	175	0
c. Storage tank seal/seal gap inspections tanks certification ^e	16	1	16	51
d. Annual testing certification of area source compliance status ^f	1	1	1	390
C. Create Information	See 3B			
D. Gather Existing Information	See 3B			
E. Write Report ^d				
a. Notification of applicability	3	1	3	0
b. Notification of construction/reconstruction/modification	2	1	2	0
c. Notification of actual startup	2	1	2	0
d. Notification of performance test	2	1	2	0
e. Notification of CEMS performance evaluation	2	1	2	0
f. Notification of area source compliance status	See 3B.d			
g. Report of performance test	See 3B			
h. Semiannual compliance reports bulk terminals major sources ^g	10	2	20	52.2
i. Semiannual compliance reports pipeline breakout major sources ^g	8	2	16	9
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan Activities	See 3B&4C			
C. Implement Activities				
a. Gasoline terminals:				
i. File cargo tank inspection records ^h	0.5	26	13	61.2
ii. Update cargo tank inspection records ^h	6	1	6	61.2
iii. Cross-check cargo tank inspection file ^h	6	26	156	61.2
b. Pipeline breakout stations	See 3B			

D. Develop Record System ⁱ	8	1	8	0
E. Time to Enter Information				
a. Record equipment subject to visual inspection requirements at pipeline breakout stations	1	1	1	0
b. Record equipment leaks data at bulk terminals	0.1	4	0.4	87
c. Record equipment leaks data at pipeline breakout stations	0.1	12	1.2	15
d. Record storage tank seal inspection results ^e	1	1	1	51
e. Records of startups, shutdowns, malfunctions, etc.	1	4	4	51
f. Area source recordkeeping ^j	0.25	1	0.25	390
F. Time to train personnel	1	1	1	102
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				
a. Bulk gasoline terminals	6	1	6	22
b. Pipeline breakout stations	4	1	4	4
Subtotal for Recordkeeping Requirements				
TOTAL ANNUAL BURDEN AND COST (rounded) ^l				
CAPITAL AND O&M COST (rounded) ^l				
GRAND TOTAL (rounded) ^l				

Assumptions:

^a We have estimated that there are 102 **major source** respondents; (comprised of 87 bulk terminals and 15 pipeline breakout **major sources of HAPs** subject to this NESHAP. We have also estimated that no new respondents will become subject to t

^b This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, Table 2 The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefi industry.

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

^d These **requirements** **requirements** only apply to new respondents. New respondents would have to comply with the initial 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 test for cargo tanks using Methods 21 and 27 is required. However, we have assumed that 50 percent of the **major source** r to test requirements equivalent to the requirements of Bulk Gasoline Terminal NSPS (40 CFR Part 60, Subpart XX) and V Part 60, Subparts K, Ka, and Kb) or the storage tank EPA Control Technique Guidelines (CTG) for pipeline breakout static

^f We have estimated that there **is**are a total of 1,560 area source **gasoline distribution facilities** (~~i.e.,~~ 1,100 bulk gasoline ter percent will be within 50 percent of major source threshold criteria ($1,560 \times 0.25 = 390$). ~~These 390 area source respondent certifying that facility parameters documenting minor source status have not been exceeded. conduct an annual certification~~

^g Respondents that are major sources of HAPs (i.e., 87 bulk terminals and 15 pipeline breakout stations) are required to sul that 60 percent of the **major** sources ($102 \times 0.6 = 61.2$ respondents, comprised of 52.2 bulk terminals and 9 pipeline breako reports under the NESHAP Subpart R since the remaining 40 percent are already complying with similar reporting require the Bulk Gasoline Terminal NSPS (40 CFR Part 60, Subpart XX) for bulk terminals and the VOL storage NSPS (40 CFR I for pipeline breakout stations.

- ^h We have assumed that 60 percent of the 102 **major source** respondents (~~i.e.~~, 61.2) are required to maintain cargo tank imp
- ⁱ Assumes that respondents already have the technology and recordkeeping systems in place to monitor daily operations an
- ^j We have assumed that 25 percent of area source facilities (390) will be required to keep annual records of their area sourc
- ^k We have assumed that 25 percent of **major source** respondents (22 bulk terminals and 4 pipeline breakout stations) will c
- ^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

0 CFR Part 63, Subpart R) (Renewal)

120.27 141.06 58.67

(E)	(F)	(G)	(H)
Technical Hours per Year	Management Hours per Year	Clerical Hours per Year	Total Labor costs per Year (\$) ^b
(E=CxD)	(F=Ex0.05)	(G=Ex0.1)	
102	5.1	10.2	\$13,585.38
0	0	0	\$0
0	0	0	\$0
816	40.8	81.6	\$108,683.04
390	19.5	39	\$51,944.10
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1,044	52.2	104	\$139,050.36
144	7.2	14.4	\$19,179.36
2,870			\$332,442
796	39.8	79.6	\$105,965.96
367	18.4	36.7	\$48,907.37
9,547	477	955	\$1,271,591.57

<-there is no test. An annual report is required

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0	0	0	\$0
0	0	0	\$0
34.8	1.74	3.48	\$4,635.01
18	0.9	1.8	\$2,397.42
51	2.55	5.1	\$6,792.69
204	10.2	20.4	\$27,170.76
97.5	4.88	9.75	\$12,986.03
102	5.1	10.2	\$13,585.38
132	6.6	13.2	\$17,581.08
16	0.8	1.6	\$2,131.04
13,070			\$1,513,744
15,900			\$1,850,000
			\$305,000
			\$2,160,000

28.75226 hrs/response

Updated per revised O&M from SS

it stations); and 390 area source respondents which are the regulation in the next three years.

40.8

per hour for Technical labor, and \$58.67 per hour for Civilian Workers, by occupational and industry group. t packages available to those employed by private

rule requirements including notifications and

detection testing at cargo tanks. Annual certification respondents that are major sources are currently subject volatile Organic Liquid (VOL) storage NSPS (40 CFR ns.

minimal and 460 pipeline breakout stations), of which 25 s are and will be required to submit an annual report r testing.

omit semiannual compliance reports. We have assumed ut stations) would be required to submit semiannual nents under NSPS reporting requirements equivalent to art 60, Subparts K, Ka, and Kb) or storage tank CTG's

Implementation files.

Must comply with existing regulations.

Determine status using the screening equation.

Conduct audits **each year**.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Gasoline Distribution Facilities (40 CFR Part 63

Activity	(A)	(B)	(C)	(D)	(E)
	EPA Hours per Occurrence	Number of Occurrences per Plant per Year	EPA Hours per Year	Plants per Year ^a	Technical Hours per Year
			(C=AxB)		(E=CxD)
Report Review					
Notification of construction/reconstruction	N/A				
Notification of actual startup	N/A				
Notification of compliance status	10	0	0	0	0
Notification of applicability	2	0	0	0	0
Notification of performance test ^c	2	0	0	0	0
Notification of CEMS performance evaluation	2	0	0	0	0
Semiannual compliance reports (major sources) ^d	10	2	20	61.2	1,224
Notification of area source compliance status ^e	0.5	1	0.5	390	195
TOTAL ANNUAL BURDEN (rounded)^f					

Assumptions:

^a We estimate that there are 102 major source respondents and 390 area source respondents subject to this NESHAP. We become subject to the regulation in the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government Step 5, \$41.64 x 1.6), \$49.44 for Technical (GS-12, Step 1, \$30.90 x 1.6) and \$26.75 Clerical (GS-6, Step 3, \$16.72 x 1.6 Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We assume that existing major source respondents are in compliance with initial rule requirements. New respondents including notifications and performance tests for add-on control devices.

^d We assume that 60 percent of the 102 major source respondents (102 x 0.6 = 61.2) would be required to submit semiannual reports. The remaining 40 percent are already complying with similar reporting requirements under another applicable NSPS rule.

^e We estimate that there are 1,560 area sources (i.e., 1,100 bulk gasoline terminal and 460 pipeline breakout stations), of which 1,100 are certifying annually that they are below the major source threshold criteria.

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

, Subpart R) (Renewal)

66.62 26.75

(F)	(G)	(H)
Management Hours per Year	Clerical Hours per Year	Costs per Year (\$) ^b
(F=Ex0.05)	(G=Ex0.1)	
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
61	122	\$64,591.70
9.8	19.5	\$10,290.35
1,630		\$74,900

: have also estimated that no new respondents will

nt overhead expenses: \$66.62 for Managerial (GS-13,
) . These rates are from the Office of Personnel

ould have to comply with the initial rule requirements

ual reports under the NESHAP Subpart R since the

which 25 percent (1,560 x 0.25 = 390) would be