

## Number of Respondents

Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
	Number of New Respondents <sup>1</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	50	0
2	0	50	0
3	0	50	0
Average	0	50	0

(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents
0	50
0	50
0	50
0	50

(E=A+B+C-D)

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startu p Cost, (B X C)	Annual O&M Costs for One Respondent
O&M	\$0	0	\$0	\$1,505.00
LDAR	\$41,254	0	\$0	\$11,876
PRD Monitoring Equipment	\$27,000	0	\$0	\$4,000
Storage Tanks Duct Work <sup>1</sup>	\$76,412	0	\$0	\$20,797
Photocopy and Postage				\$22.71
<b>Total</b>			<b>\$0</b>	

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

<sup>1</sup> Costs shown are the total costs for the estimated 21 additional tanks captured under the new 2015 three final rule.

<sup>2</sup> Reflects updated costs for PRD monitoring for stationary sources from the January 29, 2018 final rule. Costs per facility (assuming a 15-year equipment life and a seven percent interest rate) are estimated to be from memorandum from Carey, A., EPA, "Pressure Relief Device Control Options and Impacts for Off-Site Operations (OSWRO) June 26, 2017", Docket Id. No. EPA-HQ-OAR-2012-0360-0133.

<b>sts</b>	
(F)	(G)
Number of Respondents with O&M	Total O&M,
(E X F)	
50	\$75,250
50	\$593,800
50	\$200,000
1	\$20,797
100	\$2,271
	\$892,000

\$892,000

hold from the March 2015

(83 FR 3986). The annualized  
 e approximately \$4,000. See  
 Waste and Recovery

**Total Annual Response**

(A)  Information Collection Activity	(B)  Number of Respondents	(C)  Number of Responses
Initial notification (PRD)	50	0
Semiannual Report	50	2

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(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses  $E=(BxC)+D$
0	0
0	100
<b>Total</b>	<b>100</b>

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with rule requirement <sup>c,d</sup>	4	1	4	50
B. Required Activities	See 4C			
C. Create Information	See 4C			
D. Gather Existing Information <sup>c</sup>	See 4C			
E. Write Reports				
Initial Notification Report <sup>c,e</sup>	1	1	1	0
Performance Test Notification Report <sup>c,e</sup>	1	1	1	0
Compliance Status Notification <sup>c,e</sup>	2	1	2	0
Performance Test Reports <sup>c,e</sup>	8	1	8	0
Startup/Shutdown/Malfunction Report	N/A			
Semiannual Summary Report <sup>f</sup>	8	2	16	50
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping Requirements				
A. Familiarize with rule requirements <sup>c</sup>	See 3A			
B. Planned Activities <sup>c</sup>	40	1	40	0
C. Implementation of Activities				
a. VOHAP concentration determination				
Commercial Facilities <sup>g</sup>	2	260	520	25
Other Facilities <sup>h</sup>	2	12	24	25
b. Vapor Pressure Determination				
Commercial Facilities <sup>g</sup>	1	260	260	25
Other Facilities <sup>h</sup>	1	12	12	25
c. Control Equipment Visual Inspection				
Large Cover	0.25	10	2.5	50
Small Cover	0.05	1000	50	50
Closed Vent System	0.5	5	2.5	50
d. Control Equipment Leak Monitoring				
Cover Vented to Control Device	1	5	5	50
Closed Vent System	1	5	5	50
e. Control Devices				
Performance Determination <sup>c</sup>	40	1	40	0
Continuous Monitoring System	8	5	40	50
f. LDAR Program				
Identify Affected Waste Streams <sup>c</sup>	40	1	40	0
Perform Monitoring/Repair	80	1	80	50

g. PRD monitoring				
Identification of PRD devices <sup>c</sup>	8	1	8	0
Perform Monitoring/Repair	16	1	16	50
D. Develop Record System <sup>c</sup>				
Control Equipment	16	1	16	0
LDAR Program	40	1	40	0
PRD Program	8	1	8	0
E. Time to Enter Information				
Cover Designs	40	1	40	0
Control Device Design <sup>c</sup>	40	1	40	0
Control Equipment Testing <sup>c</sup>	1	1	1	0
Control Equipment Inspections <sup>c</sup>	1	1	1	50
Control Equipment Monitoring	1	1	1	50
Control Device CMS	1	52	52	50
LDAR Program	4	16	64	50
PRD Program	2	16	32	50
Off-site Material Determinations	1	52	52	50
F. Time to Train Personnel <sup>c</sup>				
Waste Determination Methods	40	1	40	0
Control equipment inspect and monitor	40	1	40	0
LDAR Program	8	1	8	0
PRD Program	8	1	8	0
G. Time for Audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded):<sup>i</sup></b>				
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):<sup>i</sup></b>				
<b>TOTAL COST:<sup>j</sup></b>				

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 50 respondents, with no additional new or reconstructed sources.
- <sup>b</sup> This ICR uses the following labor rates: Managerial \$141.06; Technical \$120.27; and Clerical \$58.67. The
- <sup>c</sup> This activity is a one-time activity following promulgation of the March 15, 2018 final rule.
- <sup>d</sup> It is assumed that it will take 4 hours to read instructions.
- <sup>e</sup> It is assumed that there will be no new sources.
- <sup>f</sup> The burden of one annual summary report was included in the burden estimate for the semiannual report.
- <sup>g</sup> It is assumed that 50 percent of the facilities, the owner or operator manages, for a fee, off-site materials removal.
- <sup>h</sup> It is assumed that 50 percent of the owners or operators accept the off-site material at another location and send it to a third party.
- <sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



120.27      141.06      58.67

(E) Technical person hours per year (Cx D)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total costs per year \$ <sup>b</sup>
200	10	20	\$26,638
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
800	40	80	\$106,552
<b>1,150</b>			<b>\$133,190</b>
0	0	0	\$0
13,000	650	1,300	\$1,731,470
600	30	60	\$79,914
6,500	325	650	\$865,735
300	15	30	\$39,957
125	6.25	12.5	\$16,649
2500	125	250	\$332,975
125	6.25	12.5	\$16,649
250	12.5	25	\$33,298
250	12.5	25	\$33,298
0	0	0	\$0
2,000	100	200	\$266,380
0	0	0	\$0
4,000	200	400	\$532,760

Note to EPA: These costs were omitted from the prior ICR f  
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0	0	0	\$0
800	40	80	\$106,552
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
50	2.5	5	\$6,660
50	2.5	5	\$6,660
2,600	130	260	\$346,294
3,200	160	320	\$426,208
1,600	80	160	\$213,104
2,600	130	260	\$346,294
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
<b>46,633</b>			<b>\$5,400,855</b>
<b>47,800</b>			<b>\$5,530,000</b>
			<b>\$892,000</b>
			<b>\$6,420,000</b>

478 hr per resp

ources becoming subject to the rule over the next three years.

se rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Worke

ceived from other generators.

ship it to the facility for storage, treatment, or disposal.

file uploaded to reginfo, however, are included in the proposal and final rule RTR ICRs uploaded to the docket (whi  
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y 110 percent to account for the benefit packages available to those employed by private industry.

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Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/ Year	(C) EPA Hours/ Year (AxB)	(D) Plants/ Year <sup>a</sup>	(E) Technical Hours/ Year (CxD)
Report Review					
New Plants <sup>c, d</sup>					
Initial notification (PRD)	2	1	2	0	0
Performance test notification	1	1	1	0	0
Compliance status notification	4	1	4	0	0
Performance test report <sup>e</sup>	16	1	16	0	0
Existing Plants					
Startup/shutdown report	N/A				
Semiannual summary report <sup>f</sup>	4	2	8	50	400
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>g</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 50 respondents, with no additional new or reconstructed sources.
- <sup>b</sup> This ICR uses the following labor rates: Managerial \$66.62; Technical \$49.44; and Clerical \$26.75. These rates are based on the 2014 EPA Region 4 labor rates.
- <sup>c</sup> There will be no travel expenses associated with this ICR since we have assumed that no new sources will be constructed.
- <sup>d</sup> It is assumed that there will be no new sources over the three year period of this ICR.
- <sup>e</sup> It is assumed that it will take 16 hours to review each performance test report.
- <sup>f</sup> It is assumed that each facility will take 4 hours twice a year to submit report.
- <sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



66.62 26.75

(F) Managerial Hours/ Year (Ex0.05)	(G) Clerical Hours/ Year (Ex0.1)	(H) Costs, \$ <sup>b</sup>
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
20	40	\$22,178
<b>460</b>		<b>\$22,200</b>

es becoming subject to the rule over the next three years.

tes are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay.

come subject to this rule over the three year period of this ICR.

The rates have been increased by 60 percent to account for the benefit packages available to government employees.

