

APPENDIX B

This Appendix contains the script that EPA's contractor followed during the consultation calls conducted under the Paperwork Reduction Act for the renewal of OMB ICR No. 2050-0021.

SPCC ICR Consultation Script

Hello [PE contact name], my name is [contractor name], and I work for ICF. We are a contractor for the U.S. Environmental Protection Agency. Every three years, EPA updates its estimates for paperwork-related burden for implementing the Spill Prevention Control and Countermeasure (SPCC) regulation. Your responses will help EPA determine reasonable burden hours required for completing SPCC paperwork. Note that the questions relate specifically to the administrative or paperwork-related activities associated with SPCC compliance, such as Plan preparation, certification, recordkeeping, and reporting, not capital or O&M costs associated with equipment or installations.

We estimate that this interview should take no more than 15 minutes and we greatly appreciate your willingness to provide insight based on your experience.

First, I will ask some general background questions to understand your experience developing SPCC Plans.

1. Our understanding based on our research is that your firm provides engineering or technical support to facilities subject to SPCC regulation, including support in preparing SPCC Plans. Is that correct?

[If **NO**, then thank them for their time and end the call.]

2. What is your position at [PE firm name]?

3. Would it be helpful to be reminded of what the SPCC regulation is?

[If **YES**, then provide the following information:

The regulation establishes spill prevention procedures, methods, and equipment requirements for non-transportation-related onshore and offshore facilities with oil storage capacity greater than certain thresholds and meeting other criteria. Regulated facilities are those which, because of their location, could reasonably be expected to discharge oil in quantities that may be harmful into the navigable waters of the United States or adjoining shorelines.]

4. Approximately how many SPCC Plans have you worked on over the last five years [or another period (annually) if needed to provide an estimate]? This would include SPCC Plans that you have developed and/or certified.
5. Can you describe the types of facilities for which you develop or certify SPCC Plans? For example, are the Plans for small or large facilities? For oil storage and distribution facilities, oil production facilities, manufacturing facilities, or farms?

6. How does your firm price its SPCC Plan development or certification services? By time and materials (T&M), fixed price, or another pricing structure?

We provided you with written questions in advance of this phone call with estimates of the labor hours required to complete SPCC-related tasks. It would be helpful for you to refer to it as I go over my next set of questions. Do you have the questions in front of you?

[Pause to confirm]

EPA estimated hours required to complete certain SPCC-related tasks. These hours vary by whether the facility is a storage or production facility, and which of EPA's four size categories the facilities fall under. For reference, the definitions of each size category are provided in Table 1. I will be asking you questions that seek to assess whether these estimates are reasonable. We understand that this assessment is based on your personal experience and that facility-specific factors may result in different values, but please do your best to think about an "average" facility you have worked with.

Table 1: SPCC-Regulated Facility Size Categories

Size Category	Aggregate Capacity
I	Non-farm facilities: 1,321 to 10,000 gallons <i>Farm facilities: 2,501¹ to 19,999 gallons</i>
II	Non-farm facilities: 10,001 to 42,000 gallons <i>Farm facilities: 20,000 to 42,000 gallons</i>
III	All facilities: 42,001 to 1 million gallons
IV	All facilities: greater than 1 million gallons

¹Note that the correct threshold is 2,500 gallons, not 2,501 gallons, which was included in the Consultation Script in error. However, EPA does not believe that this error had any material effect on the responses to the consultation questions.

[If PE firm indicated in Question 5 that they provide services to storage facilities, ask questions 7a.-7k.. If PE firm indicated that they serve production facilities, ask questions 8a.-8k.. If PE firm serves both, ask questions 7a.-7k. and 8a.-8k..]

7. **[For STORAGE facilities:]**

7a. Have you ever prepared a new Plan for a new facility? Note that preparing the Plan does not include certifying the Plan if you charge for certification separately.

[IF YES, continue on to question 7b.. IF NO, then skip to question 7d..]

7b. Approximately how many total hours are required to prepare a new Plan for each size category?

7c. In the questions we provided you, there is a table with estimated average values of labor hours required to prepare a new Plan for a new facility. These values are in Table 2. They include only the number of hours required to prepare the Plan, not to certify the Plan. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 2: Hours for preparation of new SPCC Plan for new facilities

		Management	Technical	Drafter	Clerical	Total
Storage	Category I	2	30	12	4	48
	Category II	4	60	24	8	96
	Category III	7	90	30	12	139
	Category IV	12	135	40	20	207

7d. Have you done technical amendments to an existing SPCC Plan, for example to incorporate a material change in facility design, construction, operations or maintenance that alters the potential for an oil spill? Note that amending the Plan does not include certifying the Plan if you charge for certification separately.

[IF YES, continue on to question 7e.. IF NO, then skip to question 7g..]

7e. Approximately how many total hours are required to amend an existing Plan for each size category?

7f. I will next ask about the number of labor hours required for amending an existing SPCC Plan. Please refer to Table 3. These values include only the number of hours for amending the Plan, not to certify the Plan. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 3: Hours for Plan amendment for new and existing facilities

		Management	Technical	Drafter	Clerical	Total
Storage	Category I	3	15	-	2	20
	Category II	5	30	-	4	39
	Category III	7.5	45	-	6	59
	Category IV	11.5	67.5	-	9	88

7g. Have you ever prepared a five-year review of an existing Plan?

[IF YES, continue on to question 7h.. IF NO, then skip to question 7j..]

7h. Approximately how many total hours are required to conduct a five-year review for each size category?

7i. Next I will ask about number of labor hours required for a five-year review for existing Plans. Please refer to Table 4. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 4: Hours for five-year review for existing Plan

		Management	Technical	Drafter	Clerical	Total
Storage	Category I	2	15	-	2	19
	Category II	2	30	-	2	34
	Category III	3	45	-	3	51
	Category IV	5	68	-	4.5	77

7j. Have you ever developed a SPCC facility diagram as part of developing, certifying, or reviewing a Plan?

[IF YES, continue on to question 7k.. IF NO, then this is the end of the questions related to storage facilities.]

7k. Finally, for the last question about storage facilities, please refer to Table 5 for the number of average hours required to complete a SPCC facility diagram. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 5: Hours for creating facility diagram

		Annual Hours Burden				
		Management	Technical	Drafter	Clerical	Total
Storage	Category I	0.5	4	12	-	17
	Category II	1	8	24	-	33
	Category III	2	12	30	-	44
	Category IV	3	18	40	-	

8. [For PRODUCTION facilities:]

8a. Have you prepared a new Plan for a new production facility? Note that preparing the Plan does not include certifying the Plan if you charge for certification separately.

[**IF YES**, continue on to question 8c.. **IF NO**, then skip to question 8d..]

8b. Approximately how many total hours are required to prepare a new Plan for each size category?

8c. In the questions we provided you, there is a table with estimated average values of labor hours required to prepare a new Plan for a new facility. These values are in Table 6. They include only the number of hours required to prepare the Plan, not to certify the Plan. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 6: Hours for preparation of new Plan for new facilities

		Management	Technical	Drafter	Clerical	Total
Production	Category I	1	16	7.5	2	27
	Category II	3	32	15	4	54
	Category III	5	64	30	8	107
	Category IV	8	96	45	12	161

8d. Have you done technical amendments to an existing SPCC Plan, for example to incorporate a material change in facility design, construction, operations or maintenance that alters the potential for an oil spill? Note that amending the Plan does not include certifying the Plan if you charge for certification separately.

[**IF YES**, continue on to question 8e.. **IF NO**, then skip to question 8g..]

8e. Approximately how many total hours are required to amend an existing Plan for each size category?

8f. I will next ask about the number of labor hours required for amending an existing SPCC Plan. Please refer to Table 7. These values include only the number of hours for amending the Plan, not to certify the Plan. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 7: Hours for Plan amendment for new and existing facilities

		Management	Technical	Drafter	Clerical	Total
Production	Category I	1.25	7.5	-	1	10
	Category II	2.5	15	-	2	20
	Category III	5	30	-	4	39
	Category IV	8	45	-	6	59

8g. Have you ever prepared a five-year review of an existing Plan?

[IF YES, continue on to question 8h.. IF NO, then skip to question 8i..]

8h. Approximately how many total hours are required to prepare a five-year review for each size category?

8i. Next I will ask about number of labor hours required for a five-year review for existing Plans. Please refer to Table 8. Please take a look at the values and let me know if these estimates are reasonable. If not, please let me know the number of hours that you think are reasonable. If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 8: Hours for five-year review for existing facilities

		Management	Technical	Drafter	Clerical	Total
Production	Category I	0.5	7.5	-	0.5	9
	Category II	1	15	-	1	17
	Category III	2	30	-	2	34
	Category IV	3	45	-	3	51

8j. Have you ever created a SPCC facility diagram as part of developing, certifying, or reviewing a Plan?

[IF YES, continue on to question 8k.. IF NO, then this is the end of the survey.]

8k. Finally, for the last question about production facilities, please refer to Table 9 for the number of average hours required to complete a SPCC facility diagram. Please take a look at the values and let me know if these estimates are reasonable. If not, can you tell me the number of hours that you think are reasonable? If you are unsure, do you think the total provided is reasonable? What about the distribution among staff of different levels? Which numbers do you think should be higher or lower?

Table 9: Hours for creating facility diagram

		<u>Annual Hours Burden</u>				
		Management	Technical	Drafter	Clerical	Total
Production	Category I	0.5	3	8	-	11
	Category II	1	6	15	-	22
	Category III	2	12	30	-	44
	Category IV	3	18	45	-	66