

## ATTACHMENT A

### Part A – Consultation Notes

#### 1. Keitu Response

1. The interviewee indicated that her firm provides engineering or technical support to facilities subject to SPCC regulation.
2. The interviewee is a managing director/senior project engineer at Keitu.
3. The interviewee did not need to be reminded of what the SPCC regulation was.
4. The interviewee works on about 100 SPCC Plans per year.
5. Keitu develops and certifies plans for all types of facilities. About 90 percent of plans are for oil production pads. Most amendments are due to adding to plans for oil production facilities. For storage facilities with over a million gallons, they work on about one per year. Keitu has also worked on plans for asphalt terminals, pipeline terminals, wind farms, electric co-ops, manufacturing, tractors, rail ports for crude oil, and farms.
6. Keitu prices about 90 percent of their plans on a fixed price structure because the work is repetitive. For plans for very large facilities, they price by T&M (time and materials).
7. **STORAGE FACILITIES**– Hours estimates provided by EPA were mostly higher than what Keitu provided.
  - a. The interviewee had prepared a new Plan for a new facility.
  - b. See Table 2 for total hours estimates.
  - c. See Table 2 for hours estimates by labor category.

**Table 1: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	No estimate	No estimate	2	24
	Category II	2	No estimate	No estimate	2	24
	Category III	2	No estimate	No estimate	2	60
	Category IV	12	135	40	20	207

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 3 for total hours estimates.
- f. In general, EPA's number of hours were high.

**Table 2: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	No estimate	No estimate	-	No estimate	12-14
	Category II	No estimate	No estimate	-	No estimate	12-14
	Category III	No estimate	No estimate	-	No estimate	20
	Category IV	No estimate	No estimate	-	No estimate	24

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. See Table 4 for total hours estimates.
- i. No hours estimates provided for labor categories.

**Table 3: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	No estimate	No estimate	-	No estimate	4
	Category II	No estimate	No estimate	-	No estimate	4
	Category III	No estimate	No estimate	-	No estimate	4
	Category IV	No estimate	No estimate	-	No estimate	4

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for total hours estimates.
- l. See Table 5 for hours estimates by labor category.

**Table 4: Hours for creating facility diagram**

		<u>Annual Hours Burden</u>				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	4	4	-	9
	Category II	1	4	4	-	9
	Category III	1	8	12	-	21
	Category IV	1	8	20	-	29

- 8. **PRODUCTION FACILITIES**– Hours estimates provided by EPA were mostly higher than what Keitu provided.
  - a. The interviewee had prepared a Plan for a new facility.
  - b. See Table 6 for total hours estimates.
  - c. See Table 6 for hours estimates by labor category.

**Table 5: Hours for preparation of new Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Production</b>	Category I	No estimate	No estimate	No estimate	No estimate	No estimate
	Category II	3	16	15	2	36
	Category III	5	16	30	2	53
	Category IV	8	40	45	4	97

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 7 for total hours estimates.
- f. Same number of hours as for storage facility

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

Management	Technical	Drafter	Clerical	Total
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<b>Production</b>	Category I	No estimate	No estimate	-	No estimate	12-14
	Category II	No estimate	No estimate	-	No estimate	12-14
	Category III	No estimate	No estimate	-	No estimate	20
	Category IV	No estimate	No estimate	-	No estimate	24

- g. The interviewee had prepared a five-year review of an existing Plan
- h. See Table 8 for total hours estimates.
- i. Same number of hours as for storage facility

**Table 8: Hours for five-year review for existing Plan**

		<b>Management</b>	<b>Technical</b>	<b>Drafter</b>	<b>Clerical</b>	<b>Total</b>
<b>Production</b>	Category I	No estimate	No estimate	-	No estimate	4
	Category II	No estimate	No estimate	-	No estimate	4
	Category III	No estimate	No estimate	-	No estimate	4
	Category IV	No estimate	No estimate	-	No estimate	4

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 9 for total hours estimates.
- l. See Table 9 for hours estimates by labor category. Management hours same as for storage facilities.

**Table 9: Hours for creating facility diagram**

		<b>Annual Hours Burden</b>				
		<b>Management</b>	<b>Technical</b>	<b>Drafter</b>	<b>Clerical</b>	<b>Total</b>
<b>Production</b>	Category I	No estimate	No estimate	No estimate	-	No estimate
	Category II	1	4	8	-	13
	Category III	1	4	8	-	13
	Category IV	1	8	40	-	49

**2. RSB Environmental Response**

1. The interviewee indicated that his firm provides engineering or technical support to facilities subject to SPCC regulation.
2. The interviewee is a Project Manager at RSB Environmental.
3. The interviewee did not need to be reminded of what the SPCC regulation was.
4. The interviewee has worked on more than 200 SPCC Plans over the last five years.
5. The interviewee has worked on a variety of facilities except for oil production. He has worked on distribution facilities, farms, small to mid-size manufacturing facilities. The maximum size facility he has worked on was a quarter million gallons.
6. RSB Environmental prices most of its SPCC services by fixed price. For some large facilities, they price by T&M.
7. **STORAGE FACILITIES**– Hours estimates provided by EPA were mostly higher than what RSB Environmental provided.
  - a. The interviewee had prepared a new Plan for a new facility.
  - b. See Table 2 for total hours estimates.
  - c. About 30-50% of time goes to report preparation for technical, drafter, and clerical. The interviewee has worked on only a few Category IV projects.

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

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b> <b>e</b>	Category I	50-70% of total	30-50% of total			40
	Category II	50-70% of total	30-50% of total			40
	Category III	50-70% of total	30-50% of total			60-80
	Category IV	50-70% of total	30-50% of total			120

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 3 for total hours estimates.
- f. About 50-60% of time goes to management and technical.

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

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	50-60% of total		-	40-50% of total	20
	Category II	50-60% of total		-	40-50% of total	30
	Category III	50-60% of total		-	40-50% of total	59
	Category IV	50-60% of total		-	40-50% of total	88

- g. The interviewee had prepared a five-year review of an existing Plan
- h. See Table 4 for total hours estimates. E
- i. About 50-60% of hours goes to management and technical.

**Table 8: Hours for five-year review for existing Plan**

Management	Technical	Drafter	Clerical	Total
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<b>Storage</b>	Category I	50-60% of total	-	40-50% of total	10-15
	Category II	50-60% of total	-	40-50% of total	10-15
	Category III	50-60% of total	-	40-50% of total	15-20
	Category IV	50-60% of total	-	40-50% of total	20-25

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for total hours estimates.
- l. About 70-80% of hours go to technical and drafter, 10-20% for management and clerical.

**Table 9: Hours for creating facility diagram**

		<u>Annual Hours Burden</u>				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	20% or less of total	70-80% of total		20% or less of total	12-15
	Category II	20% or less of total	70-80% of total		20% or less of total	25
	Category III	20% or less of total	70-80% of total		20% or less of total	25-30
	Category IV	20% or less of total	70-80% of total		20% or less of total	25-30

- 8. The interviewee had not worked on any production facilities.

**3. InterSpec Response**

- 1. The interviewee indicated that his firm provides engineering or technical support to facilities subject to SPCC regulation.
- 2. The interviewee is president and owner of InterSpec.
- 3. The interviewee did not need to be reminded of what the SPCC regulation was.
- 4. In the last year, the interviewee had worked on five SPCC Plans. He had reviewed well over 100 plans in the past five years because when the firm does inspections, they often find that the facility is not in compliance with federal code.
- 5. The types of facilities InterSpec develops SPCC Plans for include oil storage and distribution facilities, oil production facilities, manufacturing facilities, and animal fat and vegetable oil facilities.
- 6. InterSpec prices SPCC Plan development as fixed price.
- 7. **STORAGE FACILITIES** - Hours estimates provided by EPA were higher or the same as what InterSpec provided.
  - a. The interviewee had prepared a new Plan for a new facility.
  - b. The total number of hours required to prepare a new Plan are 38 (Category I), 60 (Category II), 124 (Category III), and 156 (Category IV).
  - c. See Table 2 for total hours estimates by labor category.

**Table 10: Hours for preparation of new SPCC Plan for new facilities**

Management	Technical	Drafter	Clerical	Total
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<b>Storage</b>	Category I	2	24	8	4	38
	Category II	4	32	16	8	60
	Category III	8	80	24	12	124
	Category IV	12	96	32	16	156

- d. The interviewee had done technical amendments to an existing SPCC Plan.
- e. The total number of hours required to amend an existing SPCC Plan are 12 (Category I), 24 (Category II), 38 (Category III), and 50 (Category IV).
- f. See Table 3 for hours estimates by labor category.

**Table 11: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	8	-	2	12
	Category II	4	16	-	4	24
	Category III	8	24	-	6	38
	Category IV	10	32	-	8	50

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. The total number of hours required to conduct a five-year review are 12 (Category I), 20 (Category II), 31 (Category III), and 41 (Category IV).
- i. See Table 4 for hours estimates by labor category.

**Table 12: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	8	-	2	12
	Category II	2	16	-	2	20
	Category III	3	24	-	4	31
	Category IV	5	32	-	4	41

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for hours estimates by labor category.

**Table 13: Hours for creating facility diagram**

		<b>Annual Hours Burden</b>				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	4	12	-	17
	Category II	1	8	24	-	33
	Category III	2	12	30	-	44
	Category IV	2	18	40	-	60

8. **PRODUCTION FACILITIES** – For services for Category I facilities and sometimes Category II facilities, hours estimates provided by EPA were lower than what Interspec provided. For Category III and IV facilities, hours estimates provided by EPA were higher than what Interspec provided.

- a. The interviewee had prepared a new Plan for a new facility. He specifically mentioned developing a new Plan for a refinery that was expanding to contain new tanks.
- b. The total number of hours required to prepare a new plan are 46 (Category I), 60 (Category II), 102 (Category III), and 161 (Category IV).
- c. See Table 6 for hours estimates by labor category. Interspec's hours were higher than EPA's estimates for all labor categories for Category I facilities, and management and drafter for Category II. All other hours were similar to EPA's estimates.

**Table 14: Hours for preparation of new Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Production</b>	Category I	4	24	16	2	46
	Category II	4	32	20	4	60
	Category III	6	64	24	8	102
	Category IV	8	96	45	12	161

- d. The interviewee had done technical amendments to an existing SPCC Plan.
- e. The total number of hours required to amend an existing SPCC Plan are 14 (Category I), 18 (Category II), 30 (Category III), and 44 (Category IV).
- f. See Table 7 for hours estimates by labor category. Category I hours were higher than EPA estimates, and all other size category hours were lower than EPA estimates.

**Table 15: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Production</b>	Category I	4	8	-	2	14
	Category II	4	12	-	2	18
	Category III	6	20	-	4	30
	Category IV	8	30	-	6	44

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. The total number of hours required to prepare a five-year review are 12 (Category I), 14 (Category II), 20 (Category III), and 30 (Category IV).
- i. See Table 8 for hours estimates by labor category. Category I hours were higher than EPA estimates, and all other size category hours were lower than EPA estimates.

**Table 16: Hours for five-year review for existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Production</b>	Category I	2	8	-	2	12
	Category II	2	10	-	2	14
	Category III	2	16	-	2	20

	Category IV	2	24	-	4	30
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- j. The interviewee had created an SPCC facility diagram.
- k. See Table 9 for hours estimates by labor category. Category I and II hours were higher than EPA estimates, and the other size category hours were lower than EPA estimates.

**Table 17: Hours for creating facility diagram**

		Annual Hours Burden				
		Management	Technical	Drafter	Clerical	Total
<b>Production</b>	Category I	2	4	8	-	14
	Category II	2	6	16	-	24
	Category III	2	12	24	-	38
	Category IV	4	18	32	-	54

**4. ECCI Response**

1. The interviewee indicated that his firm provides engineering or technical support to facilities subject to SPCC regulation.
2. The interviewee is a Senior environmental scientist at ECCI.
3. The interviewee did not need to be reminded of what the SPCC regulation was.
4. The interviewee personally had worked on five or six SPCC Plans per year and estimated that the firm had worked on 30 per year.
5. The types of facilities ECCI develops SPCC Plans for include mostly manufacturing facilities and a few oil storage facilities. They have not worked with farms in the past five years but developed about 100 Plans back then. They do not work with production facilities.
6. ECCI prices SPCC Plan development as mostly time and materials but sometime as fixed price.
7. **STORAGE FACILITIES** - Hours estimates provided by EPA were mostly higher than what ECCI provided.
  - a. The interviewee had prepared a new Plan for a new facility (only Categories I and II).
  - b. The total number of hours required to prepare a new Plan are 48 (Category I) and 48 (Category II).
  - c. See Table 2 for hours estimates by labor category.

**Table 18: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	30	4 to 8	2	38 to 42
	Category II	2	30	4 to 8	2	38 to 42
	Category III	n/a	n/a	n/a	n/a	n/a
	Category IV	n/a	n/a	n/a	n/a	n/a



- d. The interviewee had done technical amendments to an existing SPCC Plan.
- e. The total number of hours required to amend an existing Plan are 22 (Category I) and 22 (Category II).
- f. See Table 3 for hours estimates by labor category.

**Table 19: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	15	1 to 2	2	20 to 21
	Category II	2	15	1 to 2	2	20 to 21
	Category III	n/a	n/a	-	n/a	n/a
	Category IV	n/a	n/a	-	n/a	n/a

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. The total number of hours required to conduct a five-year review are 28 (Category I) and 28 (Category II).
- i. See Table 4 for hours estimates by labor category.

**Table 20: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	23	1	2	28
	Category II	2	23	1	2	28
	Category III	n/a	n/a	-	n/a	n/a
	Category IV	n/a	n/a	-	n/a	n/a

- j. The interviewee had developed an SPCC facility diagram.
- k. See Table 5 for hours estimates by labor category.

**Table 21: Hours for creating facility diagram**

		<u>Annual Hours Burden</u>				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	2	4 to 8	-	7 to 11
	Category II	1	2	4 to 8	-	7 to 11
	Category III	n/a	n/a	n/a	-	n/a
	Category IV	n/a	n/a	n/a	-	n/a

