

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	60	3,975	1,263	152,515
Obligated Parties	6,263	353,851	27,639	3,009,806
Total	6,323	357,826	28,902	3,162,321

Annual Respondent Burden and Cost by Type of Party

Table 2 - Current Total of Obligated Parties (Refiners/Importers of Non-Renewable Gasoline and Diesel Fuel, assumes 460 refiners plus 263 importers, total of 723 obligated parties). For purposes of these estimates, we assume 272 new or updated registrations for parties who designate certified NTDF as MVNRLM and who would register as refiners. There are currently 613 affected facilities associated with these 272 parties. Estimates are on a company level, except where noted. We have carried the estimates through for registration, recordkeeping and reporting.

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	
§80.1407; 80.1454	Recordkeeping: Retain records that demonstrate that certified NTDF will be used for non-transportation use (keep records; provide to EPA upon request); assumes 272 companies. Assumes records are stored/retained on a weekly basis during six month heating oil season (26 weeks - for 26 times/year).	0.10	-	-	9.40	272.00	26.00	7,072.00	707.20	66,476.80	Customary Business Practice (CBP)
§80.1408, 80.76, 80.1450	Registration: Adding obligated party role to existing registration by 272 companies who redesignate certified NTDF as MVNRLM - one time burden, one hour, spread out over three years. We expect most to add the new role in year one.	0.33	-	-	31.02	272.00	1.00	272.00	89.76	8,437.44	OTAQReg USER GUIDE
§80.1408, 80.76, 80.1450	Registration: New registration by 20 companies who redesignate certified NTDF as MVNRLM. We expect 20 new companies, total, most in year one, and have spread the two (2) hour registration burden among the three years of the ICR.	0.66	-	-	62.04	20.00	1.00	20.00	13.20	1,240.80	OTAQReg USER GUIDE
§80.1408	Recordkeeping: Maintain a running balance of MVNRLM (in/out) - Assumes that this information is kept on a facility basis and that there are 613 potentially affected facilities. As this is a running balance, assumes that records are kept on all business days, excluding weekend and Federal holidays - i.e., 260 days per year.	0.05	-	-	4.70	613.00	260.00	159,380.00	7,969.00	749,086.00	CBP
§80.1408; 80.1451	Reporting: Report volume of MVNRLM in/out, report volume of certified NTDF redesignated to MVNRLM, report volume of MVNRLM designated to non-transportation during compliance period (annual reporting)	0.25	-	-	23.50	272.00	1.00	272.00	68.00	6,392.00	*NEW DATA FIELDS - See appendix "FORMAT 1."
§80.1408; 80.1451	Reporting: Report volume of MNVRLM in/out, report volume of certified NTDF redesignated to MVNRLM, report volume of MVNRLM designated to non-transportation during compliance period (quarterly reporting)	0.25	-	-	23.50	272.00	4.00	1,088.00	272.00	25,568.00	*NEW DATA FIELDS - See appendix "FORMAT 2."

§80.1408; 80.1454	Recordkeeping: Keep records related to all transactions in which certified NTFD is resigned as MVNRLM, to all transactions in which MVNRLM is redesignated to a non-transportation use, and records related to in/our certified NTFD and MVNRLM, respectively. Assumes records kept on a facility basis and are stored weekly during heating oil season (six months of the year). This is 26 weeks, or 26 times/year.	0.05	-	-	4.70	613.00	26.00	15,938.00	796.90	74,908.60	CBP
80.1450, 80.1452	Registration: Set up new account in CDX, EMTS for parties who redesignate certified NTFD as MVNRLM and who are not currently registered. For 20 new parties expected, a one-time, one -hour burden spread out across three years. Most parties are expected to do this in year one.	0.33	-	-	31.02	20.00	1.00	20.00	6.60	620.40	OTAQReg USER GUIDE
§80.1451	Reporting: Report production volume and report volume separately for gasoline products, MVNRLM diesel products, distillate fuel that is not transportation fuel, distillate fuel that is certified NTFD (annual) - This estimate includes 723 existing Obligated Parties plus 20 additional.	0.25	-	-	23.50	743.00	1.00	743.00	185.75	17,460.50	* NEW DATA FIELDS - See appendix "FORMAT 3."
§80.1451	Reporting: Quarterly RFS Activity Report (for new registrants) - updated to reflect 20 new estimated refiners (obligated parties) reporting each year.	1.00	-	-	94.00	20.00	4.00	80.00	80.00	7,520.00	RFS0104 RFS ACTIVITY REPORT/URF
§80.1451	Reporting: RFS Annual Compliance Reports - updated to reflect 20 new estimated refiners reporting	6.00	-	-	564.00	20.00	1.00	20.00	120.00	11,280.00	RFS0303 RFS ANNUAL COMPLIANCE REPORT/URF
§80.1452	Reporting: RFS RIN Transactions - updated to reflect 20 new estimated refiners reporting each year. We assume that RIN Transactions are recorded in real time, up to once per day, for all businesses days excluding weekends and Federal holidays.	0.50	-	-	47.00	20.00	260.00	5,200.00	2,600.00	244,400.00	w/in EMTS
§80.1452	Reporting: RFS RIN Transaction Report - download in EMTS quarterly and submit	0.50	-	-	47.00	20.00	4.00	80.00	40.00	3,760.00	w/in EMTS
§80.1453	Recordkeeping: Programming of new PTD code or statement related to transfer of custody or ownership of certified NTFD (This estimate assumes 743 + 20 + 272; this is the number of currently existing Obligated Parties + 20 new registrants + 272.)	2.00	-	-	188.00	1,035.00	1.00	1,035.00	2,070.00	194,580.00	NO FORM; PTDS are a CBP. EPA provides statement that must appear; respondent must program the statement and code.

§80.1453	Recordkeeping: General PTD requirements, assuming that 50% of 1,035 actually use code per year. This is the actual use of the PTD, whereas line 20 is the retention of the PTD. Assumes PTD usage occurs on each business day - excluding weekends and Federal holidays.	0.05	-	-	4.70	518.00	260.00	134,680.00	6,734.00	632,996.00	CBP
§80.1454	Recordkeeping: Additional/amended recordkeeping associated with PTDs and additional certified NTDF (assuming 50% of 1,035 actually have records per year) and that records are stored weekly. This is the actual retention of the PTD, whereas Line 20 is the use of the PTDs.	0.05	-	-	4.70	518.00	52.00	26,936.00	1,346.80	126,599.20	CBP
§80.1464; 80.1475	Reporting: Annual attest engagements for 20 new registrants.	8.00	-	20.00	4,512.00	20.00	1.00	20.00	560.00	90,240.00	ATTEST ENGAGEMENT USER GUIDE
§80.1464; 80.1475	Reporting: Additional items for attest engagements for those already subject to attest engagements - this assumes 723 existing obligated parties plus 272 who are required to add refiner to their registration. These estimates are different from line 20, above, because these parties are assumed to already have attest engagement requirements applied to them and are adding services to that attest engagement to cover their refiner activity.	-	-	4.00	752.00	995.00	1.00	995.00	3,980.00	748,240.00	ATTEST ENGAGEMENT USER GUIDE
GRAND TOTAL						6,263.00		353,851.00	27,639.21	3,009,805.74	

Annual Respondent Burden and Cost by Type of Party

Table 1 - Current Total of RIN Generators (Assuming 595 Producers and 122 Importers of Renewable Fuels, for a total of 717 RIN Generators); we estimate five new producer-registrants under RFS program and have carried through calculations for registration, reporting, and recordkeeping for five new registrants (affected parties would be Producers) on this Table.

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	
\$80.1426; 80.1450, 80.76	Registration: Overhead, basic information - this anticipates five (5) new registrants each year, estimated due to change in Table 1 of 80.1426; includes an additional five (5) already registered parties who are registered but may have to update information. This is a one time burden.	0.75	-	-	70.50	10.00	1.00	10.00	7.50	705.00	OTAQReg USER GUIDE
\$80.1426; 80.1450, 80.1452	Registration: Set up account in CDX, EMTS - for five (5) new registrants each year estimated due to change in Table 1 of 80.1426. This is a one time burden.	1.00	-	-	94.00	5.00	1.00	5.00	5.00	470.00	OTAQReg USER GUIDE
\$80.1426; 80.1450, 80.1452	Registration: Initial engineering reviews for five (5) new registrants estimated due to change in Table 1 of 80.1426 (pathways). This is a one time burden during the three years covered by this ICR.	6.00	-	48.00	9,588.00	5.00	1.00	5.00	270.00	47,940.00	OTAQReg USER GUIDE
\$80.1426; 80.1450, 80.1452	Registration: Information to specific products or processes - for five (5) new registrants estimated due to change in Table 1 of 80.1426	1.00	-	-	94.00	5.00	1.00	5.00	5.00	470.00	OTAQReg USER GUIDE
\$80.1449	Reporting: Production Outlook Report - to reflect up to five (5) new reporting parties who are expected to need to file this report.	1.00	-	-	94.00	5.00	1.00	5.00	5.00	470.00	RFS0901: RFS PRODUCTION OUTLOOK REPORT
\$80.1451	Reporting: Quarterly RFS Activity Report (4x/year) - to reflect five (5) new reporting parties	1.00	-	-	94.00	5.00	4.00	20.00	20.00	1,880.00	RFS0104: RFS ACTIVITY REPORT/URF
\$80.1452	Reporting: RIN Transactions - to reflect five (5) new reporting parties. This assumes RIN Transactions are recorded on all business days, to exclude weekends and Federal holidays.	0.50	-	-	47.00	5.00	260.00	1,300.00	650.00	61,100.00	w/in EMTS
\$80.1452	Reporting: EMTS RFS RIN Generation Report - 4x/year - to reflect five (5) new reporting parties	0.50	-	-	47.00	5.00	4.00	20.00	10.00	940.00	w/in EMTS
\$80.1453	Recordkeeping: General PTD Requirements for five (5) new parties This is the actual daily usage of the PTD, which differs from line 14, which is the retention of the PTDs. This assumes that PTDs are used on all business days, to exclude weekends and Federal holidays.	0.05	-	-	4.70	5.00	260.00	1,300.00	65.00	6,110.00	CBP

	Recordkeeping: Specific requirements for retention of records - for five (5) new parties This is the retention of PTDs, which differs from line 13, which refers to their actual use. Assumes PTDs are stored by producers on all business days, to exclude weekends and Federal holidays.										CBP
\$80.1454		0.05	-	-	4.70	5.00	260.00	1,300.00	65.00	6,110.00	
\$80.1464	Reporting: Attest engagements - to reflect five (5) new reporting parties	8.00	-	24.00	5,264.00	5.00	1.00	5.00	160.00	26,320.00	ATTEST ENGAGEMENT USER GUIDE
GRAND TOTAL						60.00		3,975.00	1,262.50	152,515.00	

Assumptions: Assumes 260 *work days* for determining daily transactional and routine reporting. Most routine/daily recordkeeping and reporting is highly automated, so we assume daily batching of transactions. Line 13 is the actual use of the PTD at 0.05 hours per instance and Line 14 is the retention of the PTD at 0.05 hours per instance, for a total of 0.10 hours per instance.

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	57.20	115	0.05	5.75
Technical/Professional	52.99	106	0.7	74.20
Clerical	19.67	40	0.2	8.00
Legal	57.25	115	0.05	5.75
Total Employer Cost/hour				94.00
Purchased Services^b				188

^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 past fees have 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 proposed ru

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