

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	71	4,769	1,514	182,948
Obligated Parties	5,971	352,743	31,033	3,328,865
Total	6,042	357,512	32,548	3,511,813

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; 80.1408, 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)
§80.1407, 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
§80.1407, 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
§80.1407, 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
§80.1407, 80.1408; 80.1451	Reporting: Report redesignation of NTDF as MVNRLM, including reporting of MVNRLM balance resulting in RVO, MVNRL received, delivered downstream, inventory change, and balance (annual reporting)	4.00	-	-	376.00	272.00	1.00	272.00	1,088.00	102,272.00	RFS0500 (new form) Estimate increased from NPRM due to development of new form for FRM.

§80.1407, 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
§80.1407, 80.1451	Reporting: Report production volume and report volume separately for all gasoline products, all MVNRLM diesel products, combined production volume of all gasoline products and MVNRL diesel fuel, distillate fuel that is not transportation fuel, distillate fuel that is certified NTFD (annual) - This estimate includes 723 existing Obligated Parties plus 20 additional, new registrants.	4.00	-	-	376.00	743.00	1.00	743.00	2,972.00	279,368.00	RFS0304 (new form; replaces RFS0303) Estimate increased from NPRM due to development of new form for FRM.
§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 (existing form, OMB control number 2060-0725)
§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 - submit within EMTS (Reporting method simplified since proposal; this report is now easily submitted within EMTS. Removal of steps.)	0.25	-	-	23.50	20.00	4.00	80.00	20.00	1,880.00	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						5,971.00		352,743.00	31,033.46	3,328,865.24	

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 six new registrants (affected parties would be Producers) on this Table. NPRM estimated five (5) new registrants; we anticipate one additional new registrant per year due to finalized item in Line M of Table 1 and have adjusted final estimates for the FRM.

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 six (6) new registrants timed due to changes 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	11.00	1.00	11.00	8.25	775.50	OTAQReg USER GUIDE
§80.1426; 80.1450, 80.1452	Registration: Set up account in CDX, EMTS - six (6) new registrants each year estimated due to changes in Table 1 of 80.1426. This is a one time burden.	1.00	-	-	94.00	6.00	1.00	6.00	6.00	564.00	OTAQReg USER GUIDE
§80.1426; 80.1450, 80.1452	Registration: Initial engineering reviews for six (6) new registrants estimated due to changes 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	6.00	1.00	6.00	324.00	57,528.00	OTAQReg USER GUIDE
§80.1426; 80.1450, 80.1452	Registration: Information to specific products or processes - for six (6) new registrants estimated due to changes in Table 1 of 80.1426	1.00	-	-	94.00	6.00	1.00	6.00	6.00	564.00	OTAQReg USER GUIDE
§80.1449	Reporting: Production Outlook Report - to reflect up to six (6) new reporting parties who are expected to need to file this report.	1.00	-	-	94.00	6.00	1.00	6.00	6.00	564.00	RFS0901 (existing form, OMB Control Number 2060-0725)
§80.1451	Reporting: Quarterly RFS Activity Report (4x/year) - to reflect six (6) new reporting parties	1.00	-	-	94.00	6.00	4.00	24.00	24.00	2,256.00	RFS0104 (existing form, OMB Control Number 2060-0725)
§80.1452	Reporting: RIN Transactions - to reflect six (6) new reporting parties. This assumes RIN Transactions are recorded on all business days, to exclude weekends and Federal holidays.	0.50	-	-	47.00	6.00	260.00	1,560.00	780.00	73,320.00	w/in EMTS
§80.1452	Reporting: EMTS RFS RIN Generation Report - 4x/year - to reflect six (6) new reporting parties	0.50	-	-	47.00	6.00	4.00	24.00	12.00	1,128.00	w/in EMTS
§80.1453	Recordkeeping: General PTD Requirements for six (6) 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	6.00	260.00	1,560.00	78.00	7,332.00	CBP

	Recordkeeping: Specific requirements for retention of records - for six (6) 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	6.00	260.00	1,560.00	78.00	7,332.00	
\$80.1464	Reporting: Attest engagements - to reflect six (6) new reporting parties	8.00	-	24.00	5,264.00	6.00	1.00	6.00	192.00	31,584.00	ATTEST ENGAGEMENT USER GUIDE
GRAND TOTAL						71.00		4,769.00	1,514.25	182,947.50	

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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