

**Table 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal)**

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Total Labor Costs per Year <sup>b</sup>
1. Applications	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Surveys and Studies	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements	1	1	1	116	116	5.8	11.6	\$15,450.04
B. Required Activities								
i. Initial performance tests	24	1	24	0	0	0	0	\$0
ii. Repeat performance tests <sup>c</sup>	24	1	24	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write Report								
i. Notification of Construction/Reconstruction <sup>d</sup>	2	1	2	0	0	0	0	\$0
ii. Notification of Anticipated Startup <sup>d</sup>	2	1	2	0	0	0	0	\$0
iii. Notification of Actual Startup <sup>e</sup>	2	1	2	0	0	0	0	\$0
iv. Notification of Initial Performance Test <sup>d</sup>	2	1	2	0	0	0	0	\$0
v. Report of Performance Test	See 3B							
vi. Semiannual Work Practice Reports <sup>e, f</sup>	30	2	60	116	6,960	348	696	\$927,002.40
<b>Subtotal for Reporting Requirements</b>						<b>8,137</b>		<b>\$942,452</b>
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 3A							
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							
D. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information								
i. Records of Operating Parameters <sup>f, g</sup>	2.5	365	912.5	116	105,850	5,292.5	10,585	\$14,098,161.50

F. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b><i>Subtotal for Recordkeeping Requirements</i></b>						<b>121,728</b>		<b>\$14,098,162</b>
<b>Total Labor Burden and Costs (rounded) <sup>h</sup></b>						<b>130,000</b>		<b>\$15,000,000</b>
<b>Total Capital and O&amp;M Costs (rounded) <sup>h</sup></b>								<b>\$0</b>
<b>Grand Total (rounded) <sup>h</sup></b>						<b>130,000</b>		<b>\$15,000,000</b>

**Table 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petrol Subpart GGGa) (Renewal)**

<b>Burden Item</b>	<b>(A) Respondent Hours per Occurrence (Technical hours)</b>	<b>(B) Number of Occurrences per Respondent per Year</b>	<b>(C) Hours per Respondent per Year (C=A x B)</b>	<b>(D) Number of Respondents per Year<sup>a</sup></b>	<b>(E) Technical Hours per Year (E=C x D)</b>
1. Applications	N/A	N/A	N/A	N/A	N/A
2. Surveys and studies	N/A	N/A	N/A	N/A	N/A
3. Reporting Requirements					
A. Familiarization with Regulatory Requirements	1	1	1	46	46
B. Required Activities					
i. Initial Performance Tests	24	1	24	0	0
ii. Repeat performance tests <sup>c</sup>	24	1	24	0	0
C. Create Information	See 3B				
D. Gather Existing Information	See 3E				
E. Write Report					
i. Notification of Construction/Reconstruction <sup>d</sup>	2	1	2	0	0
ii. Notification of Anticipated Startup <sup>d</sup>	2	1	2	0	0
iii. Notification of Actual Startup <sup>d</sup>	2	1	2	0	0
iv. Notification of Initial Performance Test <sup>d</sup>	2	1	2	0	0
v. Report of Performance Test	See 3B				
vi. Semiannual Work Practice Reports at Large Refineries <sup>e, f</sup>	30	2	60	34.5	2,070
vii. Semiannual Work Practice Reports at Small Refineries <sup>e, f</sup>	8	2	16	11.5	184
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping Requirements					
A. Familiarization with Regulatory Requirements	See 3A				
B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information					
i. Records of Operating Parameters at Large Refineries <sup>g, h</sup>	2.64	365	964	40.25	38,785
ii. Records of Operating Parameters at Small Refineries <sup>g, h</sup>	2.66	365	971	5.75	5,583
F. Train Personnel	N/A	N/A	N/A	N/A	N/A
G. Audits	N/A	N/A	N/A	N/A	N/A

<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>i</sup></b>					
<b>Total Capital and O&amp;M Costs (rounded) <sup>i</sup></b>					
<b>Grand Total (rounded) <sup>i</sup></b>					

**Assumptions**

<sup>a</sup> We assume that an average of 46 refineries per year will be subject to the requirements of NSPS Subpart GGGa and the rule during the three-year period of this ICR. All facilities that commence construction, reconstruction, or modification of GGGa.

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupation from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages in industry.

<sup>c</sup> Assume 20% of initial performance tests must repeat due to failure.

<sup>d</sup> Owners or operators of the affected facilities must make one-time-only notifications.

<sup>e</sup> The time to prepare reports is estimated to be the same under both subparts because the information in the new records must be reported.

<sup>f</sup> Assume that 25 percent of the process units are located at small refineries (25% x 46 = 11.5). The rest are large facilities and deviations so they can complete reports in less time. Larger facilities require significantly more time to complete.

<sup>g</sup> Although monitoring of the various components may be required on a weekly, monthly, quarterly, semiannual or annual basis, monitoring overall occurs daily.

Assume that large facilities need an additional 0.14 hours per day to complete the tasks required by the new standards. The recordkeeping time for each day’s worth of monitoring for large facilities for Subpart GGGa is 2.64 hours and that monitoring time for Footnote G for the calculation for the time for calibration.

Small facilities may record instrument readings manually, so an additional 0.02 hours per day are needed for small refinery instrument readings. Therefore, it is assumed that the average recordkeeping time for each day’s worth of monitoring for small facility monitoring is done 365 days a year.

<sup>h</sup> Assume that 25 percent of the process units are located at small refineries and half of those use manual recordkeeping of instrument readings and that 75 percent of the process units are located at large refineries (46 x 75% = 34.5) and thus the number of process units requiring manual recordkeeping is (5.75 + 34.5 = 40.25)

<sup>i</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

**eum Refineries (40 CFR Part 60,**

<b>(F) Management Hours per Year (F= E x 0.05)</b>	<b>(G) Clerical Hours per Year (G= E x 0.1)</b>	<b>Total Labor Costs per Year <sup>b</sup></b>
N/A	N/A	N/A
N/A	N/A	N/A
2.3	4.6	\$6,126.74
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
104	207	\$275,703.30
9.2	18	\$24,506.96
<b>2,645</b>		<b>\$306,337</b>
N/A	N/A	N/A
1,939	3,878	\$5,165,760.83
279	558	\$743,556.48
N/A	N/A	N/A
N/A	N/A	N/A

<b>Labor Rates</b>	
Management	\$141.06
Technical	\$120.27
Clerical	\$58.67

<b>51,023</b>	<b>\$5,909,317</b>
<b>53,700</b>	<b>\$6,220,000</b>
	<b>\$0</b>
<b>53,700</b>	<b>\$6,220,000</b>

184,000

\$21,200,000

t no new refineries will become subject to the  
ter November 7, 2006 are subject to Subpart

d \$58.67 for clerical labor. These rates are  
ational and industry group.” The rates are  
available to those employed by private

must be maintained on-site, but it does not have

. (75% x 46 = 34.5). Small facilities have fewer  
e reports.

l basis, given the number of components that

erefore, it is assumed that the average  
oring is done 365 days a year. See Table 1a,

ies with manual recordkeeping of instrument  
ies for Subpart GGGa is 2.66 hours and that

instrument readings (46 x 25% x 0.5 = 5.75)  
nits that do not need additional time for manual

**Table 2a: Annual Agency Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal)**

Burden Item	(A) EPA Person- Hours per Occurrence	(B) Annual Occurrences per Respondent	(C) EPA Hours per Year (A x B)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Annual Cost <sup>b</sup>
Performance Test Report Review (New Plants)	4	1.2	4.8	0	0	0	0	\$0
Notification of Construction	2	1	2	0	0	0	0	\$0
Notification of Anticipated Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Actual Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Initial Test	0.5	1.2	0.6	0	0	0	0	\$0
Review Test Results	8	1.2	9.6	0	0	0	0	\$0
Report Review (Existing Plants)	4	2	8	116	928	46.4	92.8	\$51,453.89
<b>TOTAL (rounded) <sup>c</sup></b>						<b>1,070</b>		<b>\$51,500</b>

Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

**Assumptions**

<sup>a</sup> We assume that 116 existing refineries per year will be subject to requirements of NSPS Subpart GGG during the three-year period of this ICR. This rule applies to facilities that commenced construction, reconstruction, or modification prior to November 7, 2006. All facilities that commence construction, reconstruction, or modification after November 7, 2006 are subject to Subpart GGGa.

<sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

<sup>c</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

**Table 2b: Annual Agency Burden and Cost - NSPS for Equipment Leaks of VOC in Petrol GGGa) (Renewal)**

<b>Burden Item</b>	<b>(A) EPA Person- Hours per Occurrence</b>	<b>(B) Annual Occurrences per Respondent</b>	<b>(C) EPA Hours per Year (A x B)</b>	<b>(D) Plants per Year <sup>a</sup></b>
Performance Test Report Review (New Plants)	4	1.2	4.8	0
Notification of Construction	2	1	2	0
Notification of Anticipated Startup	0.50	1	0.5	0
Notification of Actual Startup	0.50	1	0.5	0
Notification of Initial Test	0.50	1.2	0.6	0
Review Test Results	8.00	1.2	9.6	0
Report Review (Existing Plants)	4	2	8	46
<b>TOTAL (rounded) <sup>c</sup></b>				

**Assumptions**

<sup>a</sup> We assume that an average of 46 refineries per year will be subject to the requirements of NSPS Subpart GGGa during the three-year period of this ICR. All facilities that commence construction, reconstruction, or modification a

<sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased b to government employees.

<sup>c</sup> Totals are rounded to three significant figures. Figures may not add exactly due to rounding.



**um Refineries (40 CFR Part 60, Subpart**

(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Annual Cost <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
368	18.4	36.8	\$20,404.13
<b>423</b>			<b>\$20,400</b>

Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

nd that no new refineries will become subject to the rule  
fter November 7, 2006 are subject to Subpart GGGa.

r. These rates are from the Office of Personnel  
y 60 percent to account for the benefit packages available

<b>Number of Respondents</b>				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents
1	0	116	0	0
2	0	116	0	0
3	0	116	0	0
Average	0	116	0	0

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

#### Summary of Respondent Burden

Standard	Reporting Burden (hr)	Recordkeeping Burden (hr)	Total Burden (hr)	Total Cost (\$)
Subpart GGG	8,137	121,728	130,000	\$15,000,000
Subpart GGGa	2,433	51,023	53,500	\$6,220,000
<b>Total</b>			<b>184,000</b>	<b>\$21,200,000</b>

#### Summary of Agency Burden

Standard	Total EPA Burden (hr)	Total Cost (\$)
Subpart GGG	1,070	\$51,500
Subpart GGGa	423	\$20,400
<b>Total</b>	<b>1,490</b>	<b>\$71,900</b>

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses <sup>a</sup>	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Subpart GGG Semiannual Reports	116	2	0	232
Subpart GGGa Semiannual Reports	46	2	0	92
			Total	324

<sup>a</sup> Annual occurrences of PRD reporting are not counted as separate responses because they are required to be submitted with the semiannual reports.

hrs/response:

567

(E) Number of Respondents
(E=A+B+C-D)
116
116
116
116