# Notes for renewing this ICR:

Compliance with the CAR is a voluntary alternative. Sources may continue to comply with existing applicable rules or may choose to comply with the consolidated rule. All existing sources must be in compliance with the requirements of the CAR and/or its referencing Subparts within three years of the effective date (i.e., promulgation date) of the appropriate standard for the affected source. All new so must be in compliance with the requirements of the CAR and/or its referencing Subparts upon startup promulgation date of standards for an affected source, whichever is later.

Assumptions included in ICR No. 1854.07 add: "Compliance with the CAR is a voluntary alternative Sources may continue to comply with existing applicable rules or may choose to comply with the consolidated rule. When preparing renewals for the CAR, or the referencing subparts, estimates are the percentage of existing sources that will opt to comply with the CAR in lieu of the referencing subsection Because the CAR is designed for, although not limited to, SOCMI facilities, the number of facilities comply with the CAR is based on the estimated number of SOCMI facilities. It is estimated that 25 of non-Hazardous Organic NESHAP (HON) sources will opt to comply with the CAR if the per-source burden of complying with the CAR is less than the per-source burden of complying with the reference subpart. For those referencing subparts for which the per-source burden of complying with the CAR than the per-source burden of complying with the referencing subpart (subparts Ka, Kb, Y, VV, VVa NNN, RRR, and DDD), it is estimated that 5 percent of sources will opt to comply with the CAR. It estimated that 25 percent of HON sources will opt to comply with the CAR. It is assumed that all sources will initially comply with the appropriate referencing subpart."

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opting to percent rce cing t is higher a, III, is also I new

		Number of	Respondents			]
	Respondents That S	ubmit Reports	Respondents That Do Not Submit Any Reports			
	(A)	(B)	(C)	(D)	(E)	
Year	Number of New Respondents <sup>1</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)	
		NSP	S Ka			
1	0	10	0	0	10	OAQPS identified 10 re
2	0	10	0	0	10	
3	0	10	0	0	10	
Average	0	10	0	0	10	
	1		S Kb	ı	T	
1	19	394	0	0	413	OAQPS identified 432 1
2	19	413	0	0	432	
3	19	432	0	0	451	
Average	19	413	0	0	432	
	0		S VV		170	O A O D C : 1 1 4 7 0
1	0	170	0	0	170	OAQPS identified 170 ı
3	0	170 170	0	0	170 170	
Average	0	170	0	0	170	
Average	0		S VVa	0	170	
1	5	60	0	0	65	OAQPS identified 60 re
2	5	65	0	0	70	Origi o lucitifica oo re
3	5	70	0	0	75	
Average	5	65	0	0	70	
. 0-	1		S DDD	<u> </u>	l	1
1	5	68	0	0	73	ECHO lists 68 facilities
2	5	73	0	0	78	
3	5	78	0	0	83	
Average	5	73	0	0	78	
		NSP	S III			
1	1	37	0	0	38	OAQPS identified 37 re
2	1	38	0	0	39	
3	1	39	0	0	40	
Average	1	38	0	0	39	
	Ţ		NNN	1	<del> </del>	
1	9	109	0	0	118	OAQPS identified 109 ı
2	9	118	0	0	127	-
3	9	127	0	0	136	

Average	9	118	0	0	127	
		NSPS	RRR			
1	5	59	0	0	64	OAQPS identified 59 re
2	5	64	0	0	69	
3	5	69	0	0	74	
Average	5	64	0	0	69	
		NESH	AP BB			
1	0	54	0	0	54	No updates, retained pri
2	0	54	0	0	54	
3	0	54	0	0	54	
Average	0	54	0	0	54	
		NESH	IAP Y			
1	0	4	0	0	4	No updates, retained pri
2	0	4	0	0	4	
3	0	4	0	0	4	
Average	0	4	0	0	4	
		NESH	IAP V			
1	0	67	0	0	67	No updates, retained pri
2	0	67	0	0	67	
3	0	67	0	0	67	
Average	0	67	0	0	67	
		Н	ON			
1	5	175	0	0	180	OAQPS identified ~175
2	5	180	0	0	185	
3	5	185	0	0	190	
Average	5	180	0	0	185	



espondents for this subpart that are SOCMI sources; retained 5 new source per year (amintains prior growth rate).
or estimate.
or estimate.
or estimate, but assumed no new sources.
respondents; retained 5 new sources per year. We assume only 25% of these will comply with CAR

# **Table 1: Agency Activities**

# Performance Tests

- Initial
- Repeat

# **Review Reports**

- Notification of Initial Startup
- Notification of Performance Test
- Initial Compliance Status
- Startup, Shutdown, Malfunction Plans
- Periodic Reports

Table 2: Average Annual EPA Burden and Cost for the CAR Provisions

\$49.44

	(A)	(B)	(C)	(D)	(E)
Burden item	Average hours per activity	Number of activities per respondent per year	Estimated Technical hours per plant per year (C=AxB)	Sources per year	Technical hours per year (E=CxD)
Report review					
1. Initial notification of Part 65 applicability, Title V modification <sup>b</sup>	2	1	2	0	0
2. Review equipment leak monitoring <sup>c</sup>	5	2	10	181	1,810
3. Review periodic reports <sup>d</sup>	4	1	4	45	180
TOTAL (rounded) <sup>e</sup>					

<sup>&</sup>lt;sup>a</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. The Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 pe available to government employees.

<sup>&</sup>lt;sup>b</sup> We assume no new sources will opt to comply with the CAR at startup over the next 3 years.

<sup>&</sup>lt;sup>c</sup> We estimate 181 equipment leak sources will comply with the CAR (139 from the HON, 23 from subpart VV and 19 from equipment leaks will be submitted semiannually (181 x 2 = 362 per year). See Attachment C for assumptions and further d

<sup>&</sup>lt;sup>d</sup> We estimate 25 percent of the 180 SOCMI facilities, which equals 45 facilities, will opt to comply with the CAR and must

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$66.62	\$26.75	
(F)	(G)	(H)
Managemen t hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ª
0	0	
90.5	181	\$100,357.26
9	18	\$9,980.28
2,290		\$110,000

se rates are from the Office of Personnel rcent to account for the benefit packages

n subpart  $\boldsymbol{V}$  - see Table 4). Reports for escription of activities.

st submit periodic reports each year.

Table 3: Average Annual EPA Burden and Cost for the Direct Final Standards

	(A)	(B)	(C)	(D)
Burden item	Technical person- hours per occurrence	No. of occurrence s per respondent per year	hours per	Respondents per year
Report review/filing	1	1	1	6
TOTAL (rounded) <sup>b</sup>				

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

<sup>&</sup>lt;sup>b</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	<b>(F)</b>	(G)	(H)
Technical hours per year (E=CxD)	Manageme nt hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>a</sup>
6	0.3	0.6	\$332.68
	\$333		

oor. These rates are from the Office of Personnel l by 60 percent to account for the benefit packages

Referencing subpart	Estimated number of sources complying with the CAR <sup>a, b</sup>
Storage Vessels	
Ka	26
Kb	206
Y	0
Transfer Racks	
BB	0
Equipment Leaks	
V	19
VV	23
VVa	0
Process Vents	
III	2
NNN	4
RRR	2
DDD	3
HON F & G - Storage Vessels	463
HON F & G - Transfer Racks	185
HON H &I Equipment Leaks	139
HON F & G - Process Vents	370

#### Note to EPA:

The number of affected s facilities under each subp To do so, we backcalculated of whether 5% or 25% of For e.g., for subpart Ka, Then we applied 53 tanks. For subparts BB, V, and

- <sup>a</sup> This table provides estimates on a per-source basis, rather than a per-facility basis. Therefore, estimates correlate to (as d the footnote to the appropriate Table), but do not match, facility entries in the reference subpart burden tables (Tables F-1 tl 12, and G-1 through G-13). For the purposes of this ICR, a source is defined as:
  - One storage vessel (subparts Ka, Kb, Y, and G);
  - One process vent (subparts DDD, III, NNN, RRR, and G);
  - The collection of subject equipment for one process unit (subparts VV, VVa, V, and H and I); or
  - One transfer rack (subparts BB and G).

b Based on the number of sources per facility from the most recently approved CAR ICR. Because the CAR is designed for not limited to, SOCMI facilities, the number of facilities opting to comply with the CAR is based on the estimated number facilities. It is estimated that 25 percent of non-Hazardous Organic NESHAP (HON) sources will opt to comply with the C per-source burden of complying with the CAR is less than the per-source burden of complying with the referencing subpart referencing subparts for which the per-source burden of complying with the CAR is higher than the per-source burden of cowith the referencing subpart (subparts Ka, Kb, Y, VV, VVa, III, NNN, RRR, and DDD), it is estimated that 5 percent of sor opt to comply with the CAR. It is also estimated that 25 percent of HON sources will opt to comply with the CAR.

ources under each reference subpart were adjusted to reflect the revised inventory of part.

ited the number of affected sources per facility using the prior ICR assumptions f affected sources complied with CAR.

we took 458 tanks/5%/174 respondents to estimate 53 tanks per facility. s x 10 facilities (revised inventory) x 5% complying with CAR = 26 affected sources. HON sources, we divided by 25% to match the assumptions in Attachment I.

escribed in hrough F-

; although of SOCMI AR if the . For those emplying urces will

Table 5: Basis for Annual Respondent Burden and Cost for the CAR

Burden Item	Process	s Vents	Storage Vessels		Transfo
	Per source	Total <sup>c</sup>	Per source	Total <sup>c</sup>	Per source
1. Familiarize with regulatory requirements <sup>e</sup>	2.9	1,105	1.1	765	1.1
2. Plan activities	2.1	800	1.7	1,182	0.85
3. Training	1.3	495	0.5	348	0.5
4. Creation, testing, research and development	28	10,668	16	11,120	16
5. Gather information, monitor/ inspect	14	5,334	17	11,815	17
6. Process/compile and review	0	0	0	0	0
7. Complete forms	9	3,429	5.4	3,753	5.4
8. Record/disclose	28	10,668	2.8	1,946	2.8
9. Store/file	3	1,143	1.25	869	1.25
TOTAL	88	33,642	46	31,796	45

- process vents 381
- storage vessels 695
- transfer racks 185
- equipment leaks with connector monitoring 139
- equipment leaks without connector monitoring 42
- facilities (used for inventory estimate) 45

<sup>&</sup>lt;sup>a</sup> The HON, the basis for the CAR burden estimate, requires connector monitoring. Sources originally complying w monitoring for these facilities is the average of the per source burden for subparts V and VV. The average for subpart for each burden item were estimated by multiplying the HON-based estimate by 40.9 percent.

<sup>&</sup>lt;sup>b</sup> From the most recently approved CAR ICR.

<sup>&</sup>lt;sup>c</sup> Total burden for each source type is the product of the per-source burden and the total number of sources estimated from the most recently approved ICR and are detailed in Table 4:

<sup>&</sup>lt;sup>d</sup> Total burden for each burden item is the sum of totals for each source type. This burden represents technical hours

<sup>&</sup>lt;sup>e</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

<b>Annual Bur</b>	Annual Burden in Technical Hours						
	Equipment Leaks						
er Racks	With Co	nnectors	Without Co	onnectors <sup>a</sup>	Inver	Total <sup>d</sup>	
Total <sup>c</sup>	Per source	Total <sup>c</sup>	Per source	Total <sup>c</sup>	Per source	Total <sup>c</sup>	
204	2.5	348	1	42	1.8	81.0	2,543
157	0.57	79	0.23	9.7	4.5	203	2,430
93	0	0	0	0	0	0	935
2,960	380	52,820	155	6,510	0	0	84,078
3,145	263	36,557	108	4,536	54	2,430	63,817
0	0	0	0	0	18	810	810
999	57	7,923	23	966	5.4	243	17,313
518	4.7	653	1.9	79.8	9	405	14,270
231	2.75	382	0.9	37.8	1.58	71.1	2,734
8,307	711	98,762	290	12,181	94	4,243	188,931

ith subpart V or VV will not be required to perform connector monitoring. Connector rts V and VV is 294 hours, 40.9 percent less than the HON-based estimate. Per-source estimates

I to opt to comply with the CAR. The estimated numbers of sources to comply with the CAR is

only and is the basis for determining total burden in Table 6.

**Table 6: Annual Respondent Burden and Cost for the CAR Provisions** 

\$120.27

	(A)	(B)	(C)	(D)
Burden item <sup>a</sup>	Average hours per activity	Estimated number of activities per year per respondent	Technical hours per year per respondent	Estimated technical hours per year
1. Familiarize with regulatory requirements <sup>b</sup>	2.46	23	56.5	2,543
2. Plan activities	4.2	13	54.0	2,430
3. Training	5.20	4	20.8	935
4. Creation, testing, research, and development	18.9	99	1,868	84,078
5. Gather information, monitor/inspect	2.1	677	1,418	63,817
6. Process/compile and review	18	1	18.0	810
7. Complete forms	76.9	5	385	17,313
8. Record/disclose	12.2	26	317	14,270
9. Store/file	1.74	35	60.8	2,734
TOTAL LABOR BURDEN AND COST (rounded) <sup>c</sup>				
TOTAL CAPITAL AND O&M COST (rounded) <sup>c</sup>				
GRAND TOTAL (rounded) <sup>c</sup>				

- <sup>a</sup> Following is a brief explanation of each column. A more detailed description is provided in Attachment E.
  - (A) Average hours per activity are back-calculated by dividing (C) by (B).
  - (B) Number of activities per year is based on the estimate of number of activities per year for the HON, with a reduct achieved through the CAR.
  - (C) Technical hours per year per respondent are the total technical hours for a burden item as estimated in Table 5, di
  - (D) Estimated technical hours per year are the total technical hours for all facilities for each burden item, as estimated
  - (E) Estimated managerial hours per year are assumed to be 5 percent of technical hours.
  - (F) Estimated clerical hours per year are assumed to be 10 percent of technical hours.
  - (G) Annual Cost is the sum of costs for technical, managerial, and clerical hours. This ICR uses the following labor for managerial, \$120.27 for technical, and \$58.67 for clerical labor. These rates are from the United States Departm June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total cc increased by 110 percent to account for the benefit packages available to those employed by private industry.
- b This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.
- <sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$141.06	\$58.67
D141.00	JOO.U/

(E)	(F)	(G)
Estimated managerial hours per year (E=Dx0.5)	Estimated clerical hours per year (F=Dx0.1)	Annual cost per year (\$)
127	254	\$338,755.45
122	243	\$323,683.67
46.8	93.5	\$124,572.61
4,204	8,408	\$11,198,348.82
3,191	6,382	\$8,499,786.23
40.5	81	\$107,883.90
866	1,731	\$2,305,918.47
714	1,427	\$1,900,634.62
137	273	\$364,161.44
217,000		\$25,200,000
		\$12,400,000
		\$37,600,000

tion to reflect the consolidation of activities

vided by 45 facilities. 1 in Table 5.

rates for privately-owned sources: \$141.06 ent of Labor, Bureau of Labor Statistics, impensation." The rates have been

**Table 7: Annual Respondent Burden and Cost for the Direct Final Standards** 

	(A)	(B)	(C)	(D)
Burden item	Technical person- hours per occurrence	No. of occurrence s per respondent per year	Technical person- hours per respondent per year (C=AxB)	Respondents per year
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Acquisition, installation, and utilization of technology and systems	N/A			
4. Reporting requirements				
A. Familiarize with regulatory requirements <sup>b</sup>	0.5	1	0.5	6
B. Required activities	N/A			
C. Create information	N/A			
D. Gather existing information	N/A			
E. Write report <sup>b</sup>	0.5	1	0.5	6
Subtotal for Reporting Requirements				
5. Recordkeeping requirements				
A. Familiarize with regulatory requirements	See 4A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) <sup>c</sup>				
TOTAL CAPITAL AND O&M COST (rounded) <sup>c</sup>				
GRAND TOTAL (rounded) <sup>c</sup>				

<sup>&</sup>lt;sup>a</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technic from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit pac industry.

<sup>&</sup>lt;sup>b</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

<sup>&</sup>lt;sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$120.27	\$141.06	\$58.67	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Manageme nt hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>a</sup>
3	0.15	0.3	\$399.57
3	0.15	0.3	\$399.57
	7		\$799
			+-
	0		\$0
	7		\$799
			\$0
			\$799

al, and \$58.67 for clerical labor. These rates are occupational and industry group." The rates are kages available to those employed by private

Table 8: Summary of Respondent and Agency Burden and Cost for Referencing Subparts and

	(A)	(B)	(C)	(D)	(E)	<b>(F)</b>
Subpart	Number of respondents	Total annual responses <sup>a</sup>	Respondent reporting burden hours <sup>a</sup>	Respondent recordkeeping burden hours <sup>a</sup>	Respondent burden hours <sup>a</sup>	Respondent burden costs <sup>a</sup>
NSPS Ka	10	11.33	42	2,638	2,680	\$310,376
NSPS Kb	432	1,328	15,577	43,220	58,797	\$6,809,746
NSPS VV	170	340	1,760	15,640	17,400	\$2,015,165
NSPS VVa	70	152	1,121	6,681	7,803	\$903,668
NSPS DDD	78	168	3,108	846	3,954	\$457,941
NSPS III	39	80	396	418	814	\$94,285
NSPS NNN	127	276	1,761	1,379	3,141	\$363,755
NSPS RRR	69	150	966	750	1,716	\$198,719
NESHAP BB	54	216	7,662	4,844	12,506	\$1,448,441
NESHAP Y	4	8.08	60	9	69	\$7,847
NESHAP V	67	134	4,700	4,418	9,118	\$1,056,077
NESHAP F, G, H, and I	185	1,145	659,721	108,813	768,534	\$89,009,545
CAR d	45	225	197,716	19,555	217,271	\$25,163,745
CAR Revisions <sup>e</sup>	6	6	7	0	7	\$799
TOTAL f	1,356	4,239	895,000	209,000	1,100,000	\$128,000,000

<sup>&</sup>lt;sup>a</sup> From Tables G-1 through G-13.

<sup>&</sup>lt;sup>b</sup> From Tables F-1 through F-12.

<sup>&</sup>lt;sup>c</sup> From Appendix J.

<sup>&</sup>lt;sup>d</sup> From Tables 2 and 6.

<sup>&</sup>lt;sup>e</sup> From Tables 3 and 7.

<sup>&</sup>lt;sup>f</sup> Burden and cost totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

# the CAR

(G)	(H)	(I)	(J)	]
Agency burden hours <sup>b</sup>	Agency burden costs <sup>b</sup>	O&M Costs <sup>c</sup>	Capital/ Startup costs <sup>c</sup>	
7	\$323	\$0	\$0	
596	\$28,739	\$316,366	\$13,500	
782	\$37,703	\$0	\$0	
419	\$20,182	\$0	\$1,400	
414	\$19,961	\$546,000	\$150,000	
193	\$9,293	\$52,650	\$13,500	
685	\$33,046	\$171,450	\$121,500	
373	\$17,965	\$34,500	\$125,000	
497	\$23,953	\$0	\$0	
9	\$444	\$0	\$0	
308	\$14,860	\$0	\$0	
2,777	\$133,902	\$50,050,000	\$59,800	
2,289	\$110,338	\$12,375,000	\$0	
7	\$333	\$0	\$0	hr/respo
9,400	\$450,000	\$63,500,000	\$485,000	]

onse

259

\$64,000,000 \$192,000,000

Table 9: Summary of Total Annual Responses for Referencing Subparts and the CAR

(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents		Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
NSPS Ka				
Notification of construction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of gap measurement	11	1	0	11
Report of seal gap excess	0.33	1	0	0.33
			Subtotal	11.33
NSPS Kb	•	•		
Notification of construction	19	1	0	19
Notification of actual startup	19	1	0	19
Notification of IFR internal inspection	14	1	0	14
Notification of EFR gap measurement	3.8	1	0	3.8
IFR internal inspection report	14	1	0	14
EFR 1st seal gap measurement	3.8	1	0	3.8
EFR 2nd seal gap measurement	3.8	1	0	3.8
CVS operating plan report	1.0	1	0	1.0
Report of IFR failure	34.6	1	0	34.6
Notification of IFR delay of repair/emptying	3.5	1	0	3.5
EFR 1st seal gap measurement report	413	1	0	413
EFR 2nd seal gap measurement report	413	1	0	413
Notification of refill	385	1	0	385
1 odnication of term	303		Subtotal	1,328
NSPS VV		<u> </u>	3434344	1,320
Notification of construction	0	1	0	0
Notification of reconstruction/modification	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of initial/repeat performance test	0	1	0	0
Semiannual report	170	2	0	340
F			Subtotal	340
NSPS VVa	<b>I</b>	l		
Initial performance test report	5	1	0	5
Repeat performance test report	1	1	0	1
Notification of construction	3	1	0	3
Notification of reconstruction/modification	2	1	0	2
Notification of actual startup	5	1	0	5
Notification of initial/repeat performance test	6	1	0	6
Semiannual report	65	2	0	130
- Communication of the Communi		_	Subtotal	152
NSPS DDD		I .		:
Initial performance test report	5	1	0	5
Repeat performance test report	1	1	0	1
Notification of construction/modification	5	1	0	5
Notification of actual startup	5	1	0	5
Notification of initial/repeat performance test	6	1	0	6
Semiannual report	73	2	0	146
		_	Subtotal	168

NSPS III				
Initial performance test report	1	1	0	1
Repeat performance test report	0.2	1	0	0.2
Notification of construction/modification	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of initial/repeat performance test	1.2	1	0	1.2
Semiannual report	38	2	0	76
•			Subtotal	80.4
NSPS NNN	•			•
Initial performance test report	9	1	0	9
Repeat performance test report	1.8	1	0	1.8
Notification of construction/modification	9	1	0	9
Notification of actual startup	9	1	0	9
Notification of initial/repeat performance test	10.8	1	0	10.8
Semiannual report	118	2	0	236
1			Subtotal	276
NSPS RRR				l
Initial performance test report	5	1	0	5
Repeat performance test report	1	1	0	1
Notification of construction/modification	5	1	0	5
Notification of actual startup	5	1	0	5
Notification of initial/repeat performance test	6	1	0	6
Semiannual report	64	2	0	128
T T			Subtotal	150
NESHAP BB				
Initial emission test	0	1	0	0
Monitoring performance test	0	1	0	0
Notification of construction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of emission test	0	1	0	0
Report of emission test	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test	0	1	0	0
Report facilities below cut-off	0	1	0	0
Quarterly parameter excesses	54	4	0	216
			Subtotal	216
NESHAP Y	'	-		
Annual IFR internal inspections and EFR seal gap measurements	4	1	0	4
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of emission test	0	1	0	0
Report of emission test	0	1	0	0
Notification of control installation and refill at 1st IFR degassing	0	1	0	0
Annual inspection report	4	1	0	4
Supplemental delay report	0.08	1	0	0.08
Quarterly emission report	0.00	4	0	0.00
Quarterry emission report	<del>                                     </del>	-	Subtotal	8.08
NESHAP V	I	1	Jubituui	0.00
Initial performance test report	0	1	0	0

	Total responses (all subparts)			4,239
			Subtotal	6
Write report (see Table 7)	6	1	0	6
CAR Direct Final Standards				
			Subtotal	225
Complete forms (see Table 6)	45	5	0	225
CAR Provisions				
			Subtotal	1,145
Complete reports (existing respondents; see Table G-13)	180	5	0	900
Complete reports (new respondents; see Table G-12)	5	49	0	245
NESHAP F, G, H, and I				•
			Subtotal	134
Semiannual report	67	2	0	134
Initial report	0	1	0	0
Application for alternative	0	1	0	0
Notification of initial/repeat performance test	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Repeat performance test report	0	1	0	0
Reference method 21/22 test	0	1	0	0

Table F-1: Average Annual EPA Burden and Cost for Subpart Kaa

	(A)	(B)	(C)	(D)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				0
Vapor recovery <sup>c</sup>	N/A			
Report review: Existing plant				
Notification of reconstruction	2	1	2	0
Notification of modification	2	1	2	0
Notification of seal gap measurement <sup>d</sup>	0.5	1	0.5	11
Report of gap excesses d, e	1	1	1	0.33
TOTAL (rounded) <sup>f</sup>				

- <sup>c</sup> One-time only activity required at start of construction. Any new storage vessel being constructed would be subject
- <sup>d</sup> Estimate that 10 percent of respondents (1) will use a vapor recovery control system and 90 percent of respondents (9) will using vapor recovery control are not required to do seal gap measurements. All tanks using floating roof system (9) w Twenty percent of respondents (2) will conduct a primary seal gap measurement. Total respondents submitting a notif measurement: 9 + 2 = 11.
- $^{\rm e}$  Assume that 3 percent of respondents submitting a notification of either primary or secondary gap measurement (11) secondary) requiring that a single report be filed once every three years. (11 x 0.03 = 0.33)

<sup>&</sup>lt;sup>a</sup> Assume that there will be no new source subject to the requirements of this regulation. Similar new sources will be sources with an average of 50 tanks per facility.

<sup>&</sup>lt;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 by 6 available to government employees.

<sup>&</sup>lt;sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Managemen t hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) b
0	0	0	\$0
0	0	0	\$0
5.5	0.28	0.55	\$304.95
0.33	0.02	0.03	\$18.30
	6.7		\$320

subject to NSPS Subpart Kb. There are 10 existing

These rates are from the Office of Personnel 50 percent to account for the benefit packages

to NSPS Subpart Kb.

9) will use a floating roof system. Respondents ill perform a secondary seal gap measurement. ication of either primary or secondary gap

will have excessive seal gaps (primary or

Table F-2: Average Annual EPA Burden and Cost for Subpart Kb

\$49.44

	(A)	(B)	(C)	(D)	(E)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per responden t per year (C=AxB)	Responde nts per year <sup>a</sup>	Technical hours per year (E=CxD)
Report review: New plant					
Notification of construction	2	1	2	19	38
Notification of anticipated startup	1	1	1	19	19
Notification of actual startup	1	1	1	19	19
Notification of initial inspection	1	1	1	19	19
Report review: New and Existing plants					
IFR failure report <sup>c</sup>	1	1	1	35	34.6
Notification of IFR delay of repair/emptying d	1.2	1	1.2	3.5	4.2
Notification of refill <sup>e</sup>	1	1	1	385	385
TOTAL (rounded) <sup>f</sup>					

- <sup>a</sup> We estimate an average of 413 existing respondents with an average of 4,667 regulated vessels in service will be subject ove estimate 75 percent (3,500) of vessels have an internal floating roof (IFR), 20 percent (933) have an external floating roof (EF vent system (CVS). We estimate 19 new respondents per year will become subject to subpart Kb, and assume a distribution si therefore, 14 new respondents have an IFR, 4 have an ERF, and 1 has a CVS. These estimates do not include sources subject t which we assume will comply with the HON instead.
- <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 Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased t benefit packages available to government employees.
- <sup>c</sup> We estimate that 80% of existing and new respondents ( $(413+19) \times 0.8 = 346$ ) will choose visual inspections. We estimate 1 respondents choosing annual visual inspections, yielding 35 reports. ( $346 \times 0.1 = 35$  (rounded)).
- <sup>d</sup> Estimate 10 percent of failed IFRs either are delayed in repair or are emptied, yielding 3.5 notifications per year.
- <sup>e</sup> Assume all 3,500 existing IFR tanks will be serviced routinely through a shutdown, and degassed once every ten years. One each year, for an annual average of 350 per year. This number was added to the estimated 35 visual inspection failures that we total estimate of 385 notifications of refill.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$66.62	\$26.75	
(F)	(G)	(H)
Managem ent hours per year (F=Ex0.05	Clerical hours per year (G=Ex0.1)	Total cost per year (\$)
1.9	3.8	\$2,106.95
0.95	1.9	\$1,053.47
0.95	1.9	\$1,053.47
0.95	1.9	\$1,053.47
1.73	3.46	\$1,918.43
0.21	0.4	\$230.21
19.2	38.5	\$21,323.28
600		\$28,700

er the next three years. We also R), and 5 percent (233) have a closed milar to that of existing respondents; to both subpart Kb and the HON,

rates are from the Office of by 60 percent to account for the

10 percent failure rate for the 346

e tenth of these tanks will be degassed ould lead to internal inspections, for a

Table F-3: Average Annual EPA Burden and Cost for Subpart VV

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)
Report review: New plant			
Notification of construction	8	1	8
Notification of reconstruction/ modification	2	1	2
Notification of actual startup	0.5	1	0.5
Notification of initial/repeat test	0.5	1	0.5
Review test results	2	1	2
Report review: Existing plant			
Semiannual emission report	2	2	4
TOTAL (rounded) <sup>c</sup>			

<sup>&</sup>lt;sup>a</sup> All new sources are subject to subpart VVa. There are an average of 170 existing sources per year that will be s do not include sources subject to both subpart VV and the HON, which we assume comply with the HON instead

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical la (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percei employees.

<sup>&</sup>lt;sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$49.44	\$66.62	\$26.75	
(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>		Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$)
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
170	680	34	68	\$37,703.28
		780		\$37,700

subject to subpart VV over the next three years. These estimates

ibor. These rates are from the Office of Personnel Management nt to account for the benefit packages available to government

Table F-4: Average Annual EPA Burden and Cost for Subpart VVa

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction <sup>c</sup>	8	1	8	3
Notification of reconstruction/ modification <sup>c</sup>	2	1	2	2
Notification of actual startup	0.5	1	0.5	5
Notification of initial/repeat test <sup>d</sup>	0.5	1	0.5	6
Review test results d	2	1	2	6
Report review: Existing plant				
Semiannual emission report	2.45	2	4.9	65
TOTAL (rounded) <sup>c</sup>				

<sup>&</sup>lt;sup>a</sup> Assume there will be an average of 5 new, modified, or reconstructed facilities each year and an average of 65 existin is more stringent than the HON and MON, no sources are assumed to be complying with the HON or MON instead of \$\cappa\$.

<sup>&</sup>lt;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 by 6 available to government employees.

<sup>&</sup>lt;sup>c</sup> Estimate 3 new sources will be new due to construction while 2 new sources will be new due to reconstruction or mo

<sup>&</sup>lt;sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Manageme nt hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
24	1.2	2.4	\$1,330.70
4	0.2	0.4	\$221.78
2.5	0.13	0.25	\$138.62
3	0.15	0.3	\$166.34
12	0.6	1.2	\$665.35
319	15.9	31.9	\$17,659.55
	420		\$20,000

 $\ensuremath{\mathsf{ig}}$  facilities over the next 3 years. Since Subpart VVa Subpart VVa.

These rates are from the Office of Personnel 0 percent to account for the benefit packages

dification.

Table F-5: Average Annual EPA Burden and Cost for Subpart DDD

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction/ modification	2	1	2	5
Notification of actual startup	2	1	2	5
Initial performance test	8	1	8	5
Repeat performance test <sup>c</sup>	8	1	8	1
Report review: Existing plant				
Semiannual report	2	2	4	73
TOTAL (rounded) <sup>d</sup>				

<sup>&</sup>lt;sup>a</sup> We assume 5 new affected sources per year and an average of 73 existing affected sources over the next three years.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. <sup>c</sup> Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 available to government employees.

<sup>&</sup>lt;sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Managemen t hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$)
10	0.5	1	\$554.46
10	0.5	1	\$554.46
40	2	4	\$2,217.84
8	0.4	0.8	\$443.57
292	14.6	29.2	\$16,190.23
	414		\$20,000

Γhese rates are from the Office of Personnel ) percent to account for the benefit packages

Table F-6: Average Annual EPA Burden and Cost for Subpart III

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction/ modification	2	1	2	1
Notification of anticipated startup	2	1	2	1
Notification of actual startup	2	1	2	1
Initial performance test	8	1	8	1
Repeat performance test <sup>c</sup>	8	1	8	0.2
Report review: Existing plant				
Semiannual report	2	2	4	38
TOTAL (rounded) d			_	

<sup>&</sup>lt;sup>a</sup> Assume 1 new affected source per year and an average of 38 existing affected sources over the next three years. This III and the HON, which are assumed to be complying with the HON.

<sup>&</sup>lt;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 by 6 available to government employees.

<sup>&</sup>lt;sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	(F) (G)		(H)
Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
2	0.1	0.2	\$110.89
2	0.1	0.2	\$110.89
2	0.1	0.2	\$110.89
8	0.4	0.8	\$443.57
1.6	0.1	0.2	\$88.71
152	7.6	15.2	\$8,427.79
	193		\$9,290

s does not include sources subject to both subpart

These rates are from the Office of Personnel 30 percent to account for the benefit packages

Table F-7: Average Annual EPA Burden and Cost for Subpart NNN

	(A) (B)		(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction/ modification	2	1	2	9
Notification of actual startup	2	1	2	9
Initial performance test	8	1	8	9
Repeat performance test <sup>c</sup>	8	1	8	2
Report review: Existing plant				
Semiannual report	2	2	4	118
TOTAL (rounded) <sup>d</sup>				

<sup>&</sup>lt;sup>a</sup> Assume 9 new affected sources per year subject to subpart NNN and not the HON. We assume 118 existing affected so NNN and not the HON. These estimates do not include sources subject to both Subpart NNN and the HON, which are as

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. T Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 to government employees.

<sup>&</sup>lt;sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Managemen t hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
18	0.9	1.8	\$998.03
18	0.9	1.8	\$998.03
72	3.6	7.2	\$3,992.11
16	0.8	1.6	\$887.14
472	23.6	47.2	\$26,170.51
	700		\$33,000

ources over the next three years subject to subpart ssumed to be complying with the HON.

'hese rates are from the Office of Personnel percent to account for the benefit packages available

Table F-8: Average Annual EPA Burden and Cost for Subpart RRR

\$49.44

	(A)	(B)	(C)	(D)	(E)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)
Report review: New plant					
Notification of construction/ modification	2	1	2	5	10
Notification of actual startup	2	1	2	5	10
Initial performance test	8	1	8	5	40
Repeat performance test <sup>c</sup>	8	1	8	1	8
Report review: Existing plant					
Semiannual report	2	2	4	64	256
TOTAL (rounded) <sup>d</sup>					

<sup>&</sup>lt;sup>a</sup> Assume 5 new affected sources per year subject to subpart RRR and not the HON. Assume 64 existing affected sources over do not include sources subject to both Subpart RRR and the HON, which are assumed to be complying with the HON.

<sup>&</sup>lt;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 radiangement (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percer available to government employees.

<sup>&</sup>lt;sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$66.62	\$26.75

(F)	(G)	(H)
Managemen t hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$)
0.5	1	\$554.46
0.5	1	\$554.46
2	4	\$2,217.84
0.4	0.8	\$443.57
12.8	25.6	\$14,194.18
370		\$18,000

the next three years. These estimates

ates are from the Office of Personnel it to account for the benefit packages

Table F-9: Average Annual EPA Burden and Cost for Subpart BB

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction	0.5	1	0.5	0
Notification of anticipated startup	0.5	1	0.5	0
Notification of actual startup	0.5	1	0.5	0
Initial report	8	1	8	0
Notification of emission test	0.5	1	0.5	0
Report of emission test	4	1	4	0
Notification of performance test	0.5	1	0.5	0
Report of performance test	8	1	8	0
Review test results	8	1	8	0
Report review: Existing plant				
Quarterly report	2	4	8	54
TOTAL (rounded) <sup>c</sup>				

<sup>&</sup>lt;sup>a</sup> We estimate an average of 54 existing facilities will be subject to the standard, and that no new sources will become tank truck/railcars and 131 marine vessels are subject to the standards. We assume 50 percent of marine vessels (66) annual vapor-tightness tests. We also assume all other transfer racks subject to Subpart BB are complying with the H<sup>I</sup>

<sup>&</sup>lt;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 by available to government employees.

<sup>&</sup>lt;sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	<b>(F)</b>	(G)	(H)
Technical hours per year (E=CxD)	Managemen t hours per year (F=Ex0.05)	hours per year	Total cost per year (\$)
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
432	21.6	43.2	\$23,952.67
	497		\$24,000

subject over the next three years. We estimate 3 operate at negative pressure and do not conduct ON.

These rates are from the Office of Personnel 60 percent to account for the benefit packages

Table F-10: Average Annual EPA Burden and Cost for Subpart Y

	(A)	(B)	(C)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)
Report review: New plant			
Notification of construction	See NSPS Kb		
Notification of anticipated startup	See NSPS Kb		
Notification of actual startup	See NSPS Kb		
Notification of performance test	N/A		
Report of performance test	N/A		
Notification of control installation and refill at 1st IFR degassing <sup>c</sup>	1	1	1
Report review: Existing plant			
Annual IFR internal inspection and EFR seal gap measurement	2	1	2
Supplemental delay report <sup>d</sup>	1	1	1
Quarterly emission report <sup>e</sup>	N/A		
TOTAL (rounded) <sup>f</sup>			

- <sup>c</sup> We believe that all vessels have been degassed and that all controls have been installed, as they were to be installed wit
- <sup>d</sup> Estimate two percent of existing sources will request delay of repair in the annual report.
- <sup>e</sup> Assume no sources will select the option to have a fixed roof vented to a control device, and thus have no quarterly repo
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<sup>&</sup>lt;sup>a</sup> Estimate there will be 4 existing sources not covered by the HON. The burden for all new sources is included in the NS

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. Tl 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for

	\$49.44	\$66.62	\$26.75	
(D)	<b>(E)</b>	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
0	0	0	0	\$0
4	8	0.4	0.8	\$443.57
0	0	0	0	\$0
		9		\$444

3PS Subpart Kb regulation for storage vessels at 40 CFR Part 60.

hese rates are from the Office of Personnel Management (OPM), the benefit packages available to government employees.

hin 10 years of promulgation.

orts of excess emissions.

Table F-11: Average Annual EPA Burden and Cost for Subpart V

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
Report review: New plant				
Notification of construction	2	1	2	0
Notification of anticipated startup	2	1	2	0
Notification of actual startup	2	1	2	0
Initial performance test	8	1	8	0
Repeat performance test <sup>c</sup>	8	1	8	0
Semiannual report	2	2	4	67
TOTAL (rounded) <sup>d</sup>				

<sup>&</sup>lt;sup>a</sup> Assume no new sources per year and 67 existing sources subject to Subpart V, but not the HON.

<sup>&</sup>lt;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 by 6 available to government employees.

<sup>&</sup>lt;sup>c</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

 $<sup>^{</sup>m d}$  Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$49.44	\$66.62	\$26.75	
(E)	<b>(F)</b>	(G)	(H)
Technical hours per year (E=CxD)	Managemen t hours per year (F=Ex0.05)	hours per year	Total cost per year (\$)
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
268	13.4	26.8	\$14,859.53
	308		\$14,900

These rates are from the Office of Personnel 0 percent to account for the benefit packages

Table F-12: Average Annual EPA Burden and Cost for Sources Subject to the HON

\$49.44 \$66.62 \$26.75 (A) **(B) (C)** (D) **(E)** Number Technical Managemen Clerical Average Burden item t hours per of hours per hours per hours per year activities year year activity per year (C=AxB)(D=Cx0.05)(E=Cx0.1)Report review: 1. Initial 2 5 10 0.5 1 2. Implementation plan or permit 5 100 5 10 20 3. Compliance status 40 5 200 10 20 7 4. Review equipment leak monitoring <sup>b</sup> 135 945 47 95 5. Notification of construction/reconstruction 2 0.5 5 10 1 6. Notification of anticipated startup 2 5 10 0.5 1 2 5 7. Notification of actual startup 10 0.5 1 8. Notification of performance test 2 10 5 0.5 1 9. Review of test results 8 5 40 2 4 54 10. Review periodic reports <sup>c</sup> 4 270 1,080 108 TOTAL (rounded) 2,780

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

<sup>&</sup>lt;sup>b</sup> There are 135 existing sources out of the 180 total that will continue to comply with the HON.

<sup>&</sup>lt;sup>c</sup> The 135 existing sources complying with the HON file semi-annual reports.

<b>(F)</b>
Total cost per year (\$) ª
\$554.46
\$5,544.60
\$11,089.20
\$52,396.47
\$554.46
\$554.46
\$554.46
\$554.46
\$2,217.84
\$59,881.68
\$134,000

nese rates are s have been

Table G-1: Annual Respondent Burden and Cost for Subpart Ka <sup>a</sup>

	(A)	(B)	(C)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Vapor recovery information	20	1	20
Measure seal gap	See 4E		
C. Create information	See 3B		
D. Gather existing information <sup>d</sup>	1	1	1
E. Write report			
Notification of construction	2	1	2
Notification of actual startup	2	1	2
Notification of gap measurement d	1.5	1	1.5
Report of seal gap excess <sup>e</sup>	2.5	1	2.5
Information on vapor recovery	See 3B		
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Time to enter information			
New tank seal gap measurements	5	50	250
Secondary seal gap measurements d, e, f	5	50	250
Primary seal gap measurements <sup>d, e, g</sup>	2	10	20
Fill/refill record h, i	0.2	10	2
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) <sup>j</sup>			
TOTAL CAPITAL AND O&M COST (rounded) i			
GRAND TOTAL (rounded) <sup>j</sup>			

<sup>&</sup>lt;sup>a</sup> Assume that there will be no new source subject to the requirements of this regulation. Similar new sources w 50 tanks per facility.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for tech Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and ir been increased by 110 percent to account for the benefit packages available to those employed by private indust

- <sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year
- <sup>d</sup> Estimate that 10 percent of respondents (1) will use a vapor recovery control system and 90 percent (9) will use to do seal gap measurements. All tanks using floating roof system (9) will perform a secondary seal gap measurespondents submitting a notification of either primary or secondary gap measurement: 9 + 2 = 11.
- <sup>e</sup> Assume that 3 percent of respondents submitting a notification of either primary or secondary gap measureme be filed once every three years.
- <sup>f</sup> Estimate five hours to conduct secondary seal gap measurements annually for the average 50 tanks per respon-
- g Estimate two hours to conduct primary seal measurements every five years for the average 50 tanks per respon
- <sup>h</sup> During any one year, a respondent would change liquid at approximately 20 percent of all facilities (35).
- <sup>i</sup> Estimate 0.2 hours per tank to record a liquid change at 20 percent of the average of 50 tanks per facility (10).
- <sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$120.27	\$141.06	\$58.67	
(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
10	10	0.5	1	\$1,331.90
				`
0	0	0	0	\$0
9	9	0.45	0.9	\$1,198.71
0	0	0	0	\$0
0	0	0	0	\$0
11	16.5	0.8	1.7	\$2,197.64
0.33	0.8	0.04	0.1	\$109.88
		42	<b>-</b>	\$4,838
0	0	0	0	\$0
9	2,250	112.5	225	\$299,677.50
2	40	2	4	\$5,327.60
2	4	0.2	0.4	\$532.76
		2,638	l	\$305,538
		2,680		\$310,000
				\$0
				\$310,000

vill be subject to NSPS Subpart Kb. There are 10 existing sources with an average of

nical, and 58.67 for clerical labor. These rates are from the United States idustry group." The rates are from column 1, "Total compensation." The rates have ry.

.

se a floating roof system. Respondents using vapor recovery control are not required rement. Twenty percent (2) will conduct a primary seal gap measurement. Total

nt (11) will have excessive seal gaps (primary or secondary) requiring that a report

dent.

ıdent (10 tanks per respondent per year).

Table G-2: Annual Respondent Burden and Cost for Subpart Kb

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	432
B. Required activities				
One-time-only requirements				
Notification of construction	2	1	2	19
Notification of actual startup	2	1	2	19
Notification of physical/ operational changes d	N/A			
Notification of malfunction <sup>d</sup>	N/A			
Notification of initial inspection				
IFR internal inspection	2	1	2	14
EFR gap measurement	2	1	2	4
Initial inspection report				
IFR internal inspection report	12	1	12	14
EFR 1st seal gap measurement	12	1	12	4
EFR 2nd seal gap measurement	8	1	8	4
CVS operating plan report	8	1	8	1
Repeat requirements				
Internal IFR inspection <sup>e</sup>	12	1	12	83
Visual IFR inspection <sup>e</sup>	8	1	8	330
Report of IFR failure e, f	2	1	2	35
Notification of IFR delay of repair/emptying e, f,	4	1	4	3.5
EFR 1st seal gap measurement report	12	1	12	413
EFR 2nd seal gap measurement report	8	1	8	413
Notification of refill h	2	1	2	385
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A			
B. Gather and record information				
Vessel volumes, liquid vapor pressures, flares	8	1	8	413
113b(a) inspection	12	1	12	413
113b(b) gap measurement	12	1	12	413
C. Develop record system	N/A			
D. Time to enter information				
CVS parameter records	2	52	104	234
E. Train personnel	N/A			

F. Audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) i			
TOTAL CAPITAL AND O&M COST (rounded) i			
GRAND TOTAL (rounded) i			

- <sup>a</sup> We estimate an average of 413 existing respondents with an average of 4,667 regulated vessels in service will be subject ovvessels have an internal floating roof (IFR), 20 percent (933) have an external floating roof (EFR), and 5 percent (233) have a year will become subject to subpart Kb, and assume a distribution similar to that of existing respondents; therefore, 14 new re estimates do not include sources subject to both subpart Kb and the HON, which we assume will comply with the HON instead
- <sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$50 Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group. have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.
- d The General Provision notifications of modification or malfunction will be covered by other notifications within the subpart
- <sup>e</sup> For each of the 3,500 IFRs associated with the 413 existing respondents, we estimate that 80 percent (413 x 0.8 = 330) will 83) will conduct an internal inspection. These activities are required to generate the information for the IFR failure report and response.
- <sup>f</sup> We estimate that 80% of existing and new respondents ((413+19)  $\times$  0.8 = 346) will choose visual inspections. We estimate 1 visual inspections, yielding 35 reports. (346  $\times$  0.1 = 35 (rounded)).
- <sup>g</sup> Estimate 10 percent of the 35 failed IFRs either are delayed in repair or are emptied, yielding 3.5 notifications per year.
- <sup>h</sup> Assume all 3,500 existing IFR tanks will be serviced routinely through a shutdown, and degassed once every ten years. On average of 350 per year. This number was added to the estimated 35 visual inspection failures that would lead to internal insp
- <sup>1</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$120.27 \$141.06 \$58.67

\$120.27			
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
432	22	43	\$57,538.08
38	1.9	3.8	\$5,061.22
38	1.9	3.8	\$5,061.22
29	1.4	2.9	\$3,795.92
7.6	0.38	0.8	\$1,012.24
171	0.6	17	ФЭЭ <b>77</b> 5 40
171	8.6	17	\$22,775.49
46	2.3	4.6	\$6,073.46
7.6	1.5 0.38	3.0 0.76	\$4,048.98 \$1,012.24
7.0	0.30	0.76	\$1,012.24
991	50	99	\$132,017.93
2,643	132	264	\$352,047.81
69.2	3.46	7	\$9,216.75
13.84	0.692	1.384	\$1,843.35
			•
4,956	247.8	495.6	\$660,089.64
3,304 769	165.2 38	330.4 76.9235	\$440,059.76 \$102,454.41
703	15,577	70.3233	\$1,804,108
	15,577		ψ1,004,100
3,304	165.2	330.4	\$440,059.76
4,956	247.8	495.6	\$660,089.64
4,956	247.8	495.6	\$660,089.64
.,550		.55.0	\$550,000.04
24,367	1,218	2,437	\$3,245,398.11
			-

43,220		\$5,005,637
58,800		\$6,810,000
		\$330,000
		\$7,140,000

er the next three years. We also estimate 75 percent (3,500) of closed vent system (CVS). We estimate 19 new respondents per spondents have an IFR, 4 have an ERF, and 1 has a CVS. These ad

3.67 for clerical labor. These rates are from the United States "The rates are from column 1, "Total compensation." The rates

t. conduct an annual visual inspection, while 20 percent (413 x 0.2 = 1 EFR primary and secondary seal gap reports, but do not require

10 percent failure rate for the 346 respondents choosing annual

e tenth of these tanks will be degassed each year, for an annual pections, for a total estimate of 385 notifications of refill.

Table G-3: Annual Respondent Burden and Cost for Subpart VV

	(A)	(B)	(C)	(D)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	170
B. Required activities				
Initial performance test report	48	1	48	0
Repeat performance test report d	48	1	48	0
C. Create information	See 3B			
D. Gather existing information	See 3E			
E. Write report				
Notification of construction	2	1	2	0
Notification of reconstruction/modification	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of initial/repeat performance test	2	1	2	0
Semiannual report	4	2	8	170
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan activities	See 4C			
C. Implement activities	See 3B			
D. Develop record system	N/A			
E. Time to enter information				
Records of operating parameters	80	1	80	170
F. Train personnel	N/A			
G. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup>				
TOTAL CAPITAL AND O&M COST (rounded) °				
GRAND TOTAL (rounded) <sup>e</sup>				

<sup>&</sup>lt;sup>a</sup> All new sources are subject to Subpart VVa. There is an average of 170 existing sources per year that will be subject to si include sources subject to both subpart VV and the HON, which we assume comply with the HON instead.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$ Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry grourates have been increased by 110 percent to account for the benefit packages available to those employed by private industry."

<sup>&</sup>lt;sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

- <sup>d</sup> Assume 20 percent of performance tests must be repeated.
- <sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$120.27	\$141.06	\$58.67	
(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
170	8.5	17	\$22,642.30
0	0	0	\$0 \$0
, , , , , , , , , , , , , , , , , , ,			40
0	0	0	\$0 \$0
0	0	0	\$0
0	0	0	\$0
1,360	68	136	\$181,138.40
	1,760		\$203,781
13,600	680	1360	\$1,811,384.00
	15,640		\$1,811,384
	17,400		\$2,020,000
			\$0
			\$2,020,000

 $\mbox{ubpart}\ \mbox{VV}$  over the next three years. These estimates do not

\$58.67 for clerical labor. These rates are from the United States ip." The rates are from column 1, "Total compensation." The y.

Table G-4: Annual Respondent Burden and Cost for Subpart VVa

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial performance test report	48	1	48
Repeat performance test report d	48	1	48
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write report			
Notification of construction <sup>e</sup>	2	1	2
Notification of reconstruction/modification <sup>e</sup>	2	1	2
Notification of actual startup	2	1	2
Notification of initial/repeat performance test d	2	1	2
Semiannual report	4.5	2	9
Subpart for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities	See 4C		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Time to enter information			
Records of operating parameters - average facilities <sup>f</sup>	89.5	1	89.5
Records of operating parameters - small facilities <sup>f</sup>	95.2	1	95.2
F. Train personnel	N/A		
G. Audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) g			
TOTAL CAPITAL AND O&M COST (rounded) <sup>g</sup>			
GRAND TOTAL (rounded) <sup>g</sup>			

<sup>&</sup>lt;sup>a</sup> Assume there will be an average of 5 new, modified, or reconstructed facilities each year and an average than the HON and MON, no sources are assumed to be complying with the HON or MON instead of Subpa

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational a have been increased by 110 percent to account for the benefit packages available to those employed by priv

<sup>&</sup>lt;sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each

<sup>&</sup>lt;sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>e</sup> Estimate 3 new sources will be new due to construction while 2 new sources will be new due to reconstru

- f Assume 10 percent are small facilities that will record instrument readings manually while the other 90 pe
- $^{\rm g}$  Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$120.27	\$141.06	\$58.67	
(D)	<b>(E)</b>	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
70	70	3.5	7	\$9,323.30
5	240 48	12 2.4	24 4.8	\$31,965.60 \$6,393.12
_				4 3,55 3.12
3	6	0.3	0.6	\$799.14
2	4	0.2	0.4	\$532.76
5	10	0.5	1.0	\$1,331.90
6	12	0.6	1.2	\$1,598.28
65	585	29	59	\$77,916.15
		1,121		\$129,860
58	5,191	260	519	\$691,389.29
7	618.8	31	62	\$82,417.97
		6,681		\$773,807
		7,800		\$904,000
				\$1,400
				\$905,000

of 65 existing facilities over the next 3 years. Since Subpart VVa is more stringent art VVa.

technical, and \$58.67 for clerical labor. These rates are from the United States and industry group." The rates are from column 1, "Total compensation." The rates rate industry.

year.

iction or modification.

ercent use automated equipment to capture instrument readings electronically.

Table G-5: Annual Respondent Burden and Cost for Subpart DDD

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial performance test report	360	1	360
Repeat performance test report <sup>d</sup>	360	1	360
C. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	1	1	1
Notification of initial/repeat performance test	2	1	2
Semiannual report	3	2	6
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
Records of operating parameters for control devices	1	12	12
Records of operating conditions exceeding last performance test	1	8	8
Records of startup, shutdown, malfunction, etc.	0.25	5	1.25
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) °			
TOTAL CAPITAL AND O&M COST (rounded) e			
GRAND TOTAL (rounded) °			

<sup>&</sup>lt;sup>a</sup> Assume 5 new affected sources per year and an average of 73 existing affected sources over the next three years.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates percent to account for the benefit packages available to those employed by private industry.

<sup>&</sup>lt;sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

<sup>&</sup>lt;sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$120.27	\$141.06	\$58.67	
(D)	<b>(E)</b>	<b>(F)</b>	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
78	78	3.9	7.8	\$10,388.82
5	1,800	90	180	\$239,742.00
1	360	18	36	\$47,948.40
5	10	0.5	1	\$1,331.90
5	5	0.3	0.5	\$665.95
6	12	0.6	1.2	\$1,598.28
73	438	22	44	\$58,337.22
		3,108		
_		_	_	
5	60	3	6	\$7,991.40
73	584	29	58	\$77,782.96
73	91	4.6	9.1	\$12,153.59
	846			\$97,928
	3,950			\$458,000
				\$696,000
				\$1,150,000

58.67 for clerical labor. These rates are from the United States Department of are from column 1, "Total compensation." The rates have been increased by 110

Table G-6: Annual Respondent Burden and Cost for Subpart III

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial performance test report	60	1	60
Repeat performance test report <sup>d</sup>	60	1	60
C. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	1	1	1
Notification of initial/repeat performance test	2	1	2
Semiannual report	3	2	6
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
Records of operating parameters for control devices	1	12	12
Records of operating conditions exceeding last performance test	1	8	8
Records of startup, shutdown, malfunction, etc.	0.25	5	1.25
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) <sup>c</sup>			
TOTAL CAPITAL AND O&M COST (rounded) c			
GRAND TOTAL (rounded) °			

<sup>&</sup>lt;sup>a</sup> Assume 1 new affected source per year and an average of 38 existing affected sources over the next three which are assumed to be complying with the HON.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 fo Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational have been increased by 110 percent to account for the benefit packages available to those employed by pri

<sup>&</sup>lt;sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each

<sup>&</sup>lt;sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$120.27	\$141.06	\$58.67	
(D)	<b>(E)</b>	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
39	39	1.95	3.9	\$5,194.41
1	60	3	6	\$7,991.40
0.2	12	0.6	1.2	\$1,598.28
1	2	0.1	0.2	\$266.38
1	1	0.05	0.1	\$133.19
1.2	2.4	0.1	0.2	\$319.66
38	228	11	23	\$30,367.32
		396		\$45,871
1	12	0.6	1.2	\$1,598.28
38	304	15	30	\$40,489.76
38	48	2.4	4.8	\$6,326.53
		418		\$48,415
		814		\$94,300
				\$66,200
				\$161,000

 $<sup>{\</sup>tt e}$  years. This does not include sources subject to both Subpart III and the HON,

r technical, and 58.67 for clerical labor. These rates are from the United States and industry group." The rates are from column 1, "Total compensation." The rates vate industry.

ı year.

Table G-7: Annual Respondent Burden and Cost for Subpart NNN

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial performance test report	60	1	60
Repeat performance test report <sup>d</sup>	60	1	60
C. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	1	1	1
Notification of initial/repeat performance test	2	1	2
Semiannual report	3	2	6
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
Records of operating parameters for control devices	1	12	12
Records of operating conditions exceeding last performance test	1	8	8
Records of startup, shutdown, malfunction, etc.	0.25	5	1.25
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup>			
TOTAL CAPITAL AND O&M COST (rounded) e			
GRAND TOTAL (rounded) °			

- c This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.
- <sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<sup>&</sup>lt;sup>a</sup> Assume 9 new affected sources per year subject to subpart NNN and not the HON, and 118 existing affected sources over Subpart NNN and the HON, which are assumed to be complying with the HON.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates percent to account for the benefit packages available to those employed by private industry.

	\$120.27	\$141.06	\$58.67	
(D)	<b>(E)</b>	<b>(F)</b>	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
127	127	6.4	13	\$16,915.13
9	540	27	54	\$71,922.60
2	108	5.4	11	\$14,384.52
9	18	0.9	1.8	\$2,397.42
9	9	0.45	0.9	\$1,198.71
11	22	1.1	2.2	\$2,876.90
118	708	35	71	\$94,298.52
	1,761			\$203,994
9	108	5.4	11	\$14,384.52
118	944	47	94	\$125,731.36
118	148	7.4	15	\$19,645.53
		1,379		\$159,761
		3,140		\$364,000
				\$293,000
				\$657,000

er the next three years. These estimates do not include sources subject to both

58.67 for clerical labor. These rates are from the United States Department of are from column 1, "Total compensation." The rates have been increased by 110

Table G-8: Annual Respondent Burden and Cost for Subpart RRR

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial performance test report	60	1	60
Repeat performance test report <sup>d</sup>	60	1	60
C. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	1	1	1
Notification of initial/repeat performance test	2	1	2
Semiannual report	3	2	6
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
Records of operating parameters for control devices	1	12	12
Records of operating conditions exceeding last performance test	1	8	8
Records of startup, shutdown, malfunction, etc.	0.25	5	1.25
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup>			
TOTAL CAPITAL AND O&M COST (rounded) <sup>e</sup>			
GRAND TOTAL (rounded) °			

<sup>&</sup>lt;sup>a</sup> Assume 5 new affected sources per year subject to subpart RRR and not the HON, and 64 existing affected sources over RRR and the HON, which are assumed to be complying with the HON.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates percent to account for the benefit packages available to those employed by private industry.

<sup>&</sup>lt;sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

<sup>&</sup>lt;sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

	\$120.27	\$141.06	\$58.67	
(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
69	69	3.45	6.9	\$9,190.11
				***
5	300	15	30	\$39,957.00
1	60	3	6	\$7,991.40
5	10	0.5	1	\$1,331.90
5	5	0.25	0.5	\$665.95
6	12	0.6	1.2	\$1,598.28
64	384	19	38	\$51,144.96
	966			\$111,880
5	60	3	6	\$7,991.40
64	512	26	51	\$68,193.28
64	80	4	8	\$10,655.20
		750		\$86,840
		1,720		\$199,000
				\$160,000
				\$359,000

the next three years. These estimates do not include sources subject to both Subpart

58.67 for clerical labor. These rates are from the United States Department of are from column 1, "Total compensation." The rates have been increased by 110

Table G-9: Annual Respondent Burden and Cost for Subpart BB

	(A)	(B)	(C)
Burden item	Person- hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1
B. Required activities			
Initial emission test	20	1	20
Monitoring performance test	280	1	280
Vapor-tightness test tank truck and railcars	11	1	11
Marine vessels	80	1	80
Closed vent leak inspection	8	1	8
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write report			
Notification of construction	2	1	2
Notification of anticipated startup	2	1	2
Notification of actual startup	2	1	2
Notification of emission test	2	1	2
Report of emission test	8	1	8
Notification of performance test	2	1	2
Report of performance test	8	1	8
Report facilities below cut-off <sup>d</sup>	8	1	8
Quarterly parameter excesses	4	4	16
Subtotal for Reporting Requirements			
Recordkeeping requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities	See 4C		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Time to enter information			
Facilities above cut-off	1.5	52	78
Facilities below cut-off <sup>d</sup>	0.5	52	26
F. Train personnel	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) °			
TOTAL CAPITAL AND O&M COST (rounded) °			
GRAND TOTAL (rounded) °			

- <sup>a</sup> We estimate an average of 54 existing facilities will be subject to the standard, and that no new sources will become subvessels are subject to the standards. We assume 50 percent of marine vessels (66) operate at negative pressure and do not to subpart BB are complying with the HON.
- <sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> For sources below the low quantity applicability for control requirements, a report is only required the first year of opera
- <sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

\$120.27 \$141.06 \$58.67

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
54	54	2.7	5.4	\$7,192
0	0	0	0	\$0
0	0	0	0	\$0
3	33	1.65	3.3	\$4,395.27
66	5,280	264	528	\$703,243.20
54	432	21.6	43.2	\$57,538.08
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
54	864	43.2	86.4	\$115,076.16
		7,662		\$887,445
54	4,212	210.6	421.2	\$560,996.28
0	0	0	0	\$0
		4,844		\$560,996
		12,500		\$1,450,000
				\$0
				\$1,450,000

ject over the next three years. We estimate 3 tank truck/railcars and 131 marine conduct annual vapor-tightness tests. We also assume all other transfer racks subject

\$58.67 for clerical labor. These rates are from the United States Department of are from column 1, "Total compensation." The rates have been increased by 110

ation. We assume existing sources previously have submitted this report.

Table G-10: Annual Respondent Burden and Cost for Subpart Y

	(A)	(B)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Reporting requirements		
A. Familiarize with regulatory requirements <sup>c</sup>	1	1
B. Required activities		
Initial performance test	N/A	
C. Create information		
Annual IFR internal inspections and EFR seal gap measurements	8	1
D. Gather existing information	See 3C	
E. Write report		
Notification of construction/ reconstruction	See NSPS Kb	
Notification of anticipated startup	See NSPS Kb	
Notification of actual startup	See NSPS Kb	
Notification of emission test	N/A	
Report of emission test	N/A	
Notification of control installation and refill at 1st IFR degassing <sup>d</sup>	2	1
Annual inspection report	2	2
Supplemental delay report <sup>e</sup>	2	1
Quarterly emission report <sup>f</sup>	None expected	
Subtotal for Reporting Requirements		
4. Recordkeeping requirements		
A. Familiarize with regulatory requirements	See 3A	
B. Plan activities	See 4C	
C. Implement activities		
Filing and maintaining records	2	1
D. Develop record system	See 4C	
E. Time to enter information	See 4C	
F. Train personnel	N/A	
G. Audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded) 8		
TOTAL CAPITAL AND O&M COST (rounded) <sup>g</sup>		
GRAND TOTAL (rounded) <sup>g</sup>		

<sup>&</sup>lt;sup>a</sup> Estimate there will be 4 existing sources not covered by the HON. The burden for all new sources is include

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for tec Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The account for the benefit packages available to those employed by private industry.

 $<sup>^{\</sup>mathrm{c}}$  This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year

- <sup>d</sup> We believe that all vessels have been degassed and that all controls have been installed, as they were to be in
- $^{\rm e}\,$  Estimate two percent of existing sources will request delay of repair in the annual report.
- $^{\rm f}\,$  Assume no sources will select the option to have a fixed roof vented to a control device, and thus have no qu
- <sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

		\$120.27	\$141.06	\$58.67	
(C)	(D)	(E)	(F)	(G)	(H)
Person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
1	4	4	0.2	0.4	\$532.76
8	4	32	1.6	3.2	\$4,262.08
2	0	0	0	0	\$0
4	4	16	0.8	1.6	\$2,131.04
2	0.1	0.2	0.01	0.02	\$21.31
			60		\$6,947
2	4	8	0.4	0.8	\$1,065.52
			9		\$900
			69		\$7,850
					\$0
					\$7,850

ed in the NSPS subpart Kb regulation for storage vessels at 40 CFR Part 60.

hnical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, rates are from column 1, "Total compensation." The rates have been increased by 110 percent to

ıstalled within 10 years of promulgation.

arterly reports of excess emissions.

Table G-11: Annual Respondent Burden and Cost for Subpart V

	(A)	(B)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Reporting requirements		
A. Familiarize with regulatory requirements <sup>c</sup>	1	1
B. Required activities		
Initial performance test	20	1
Reference method 21/22 test	4	1
Repeat performance test <sup>d</sup>	20	1
C. Create information	See 3B	
D. Gather existing information	See 3B	
E. Write report		
Notification of construction/reconstruction	2	1
Notification of anticipated startup	2	1
Notification of actual startup	2	1
Notification of initial/repeat performance test <sup>d</sup>	2	1
Report of performance test	See 3B	
Application for alternative	10	1
Initial report	8	1
Semiannual report	30	2
Subtotal for Reporting Requirements		
4. Recordkeeping requirements		
A. Familiarize with regulatory requirements	See 3A	
B. Plan activities	See 4C	
C. Implement activities	See 3B	
D. Develop record system	N/A	
E. Time to enter information		
Record of startup, shutdown, malfunction, etc. <sup>e</sup>	1.5	1
Record of operation, parameters, and emissions	0.1	365
Record of leaks detected	0.4	52
F. Train personnel	N/A	
G. Audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup>		
TOTAL CAPITAL AND O&M COST (rounded) c		
GRAND TOTAL (rounded) <sup>c</sup>		

<sup>&</sup>lt;sup>a</sup> Assume 0 new sources per year and 67 existing sources subject to subpart V, but not the HON.

<sup>&</sup>lt;sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for t Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." Th account for the benefit packages available to those employed by private industry.

- $^{\rm c}$  This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each y
- <sup>d</sup> Assume 20 percent of initial performance tests must be repeated due to failure.
- <sup>e</sup> Assume 3% of sources experience a startup, shutdown, or malfunction per year.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

		\$120.27	\$141.06	\$58.67	
(C)	(D)	(E)	(F)	(G)	(H)
Person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) <sup>b</sup>
1	67	67	3.4	6.7	\$8,923.73
20	0	0	0	0	\$0
4	0	0	0	0	\$0
20	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0.0	0.0	\$0
10	0	0	0	0	\$0
8	0	0	0	0	\$0
60	67	4,020	201	402	\$535,423.80
			4,700		\$544,348
1.5	2	3	0.2	0.3	\$399.57
36.5	67	2,446	122	245	\$325,716.15
20.8	67	1,394	70	139	\$185,613.58
			4,418		\$511,729
			9,120		\$1,056,000
			-		\$0
					\$1,056,000

echnical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, ie rates are from column 1, "Total compensation." The rates have been increased by 110 percent to

Table G-12: Annual Respondent Burden and Cost for New Sources Subject to the HON

					\$120.27	\$141.06	\$58.67	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Burden item	Average hours per activity <sup>a</sup>	Number of activities per year per respondent	Technical hours per year per respondent	Estimated number of New Respondent S b	Estimated technical hours per year (E=CxD)	Estimated managerial hours per year (F=Ex0.05)	Estimated clerical hours per year (G=Ex0.1)	Total cost per year (\$) °
1. Familiarize with regulatory requirements	2.69	93	250	5	1,250	63	125	\$166,487.50
2. Plan activities	3.82	93	355	5	1,775	89	178	\$236,412.25
3. Training	3.47	38	132	5	660	33	66	\$87,905.40
4. Creation, testing, research, and development	2.4	1,778	4,266	5	21,330	1,067	2,133	\$2,840,942.70
5. Gather information, monitor/inspect	1.4	2,102	2,943	5	14,715	736	1,472	\$1,959,890.85
6. Process/compile and review	0.8	50	40	5	200	10	20	\$26,638.00
7. Complete reports	11.37	49	557	5	2,785	139	279	\$370,934.15
8. Record/disclose	9.98	49	489	5	2,445	122	245	\$325,649.55
9. Store/file	5.18	51	264	5	1,320	66	132	\$175,810.80
TOTAL LABOR BURDEN AND COST (rounded) d						53,500		\$6,190,000
TOTAL CAPITAL AND O&M COST (rounded) d								See Table G-13
GRAND TOTAL (rounded) <sup>d</sup>								\$6,190,000

<sup>&</sup>lt;sup>a</sup> Average hours per activity are back-calculated by dividing (C) by (B).

<sup>&</sup>lt;sup>b</sup> The number of new respondents (5) is from a previously approved ICR.

<sup>&</sup>lt;sup>c</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>&</sup>lt;sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. See Attachment I for assumptions and further description of activities.

Table G-13: Annual Respondent Burden and Cost for Existing Sources Subject to the HON

					\$120.27	\$141.06	\$58.67	
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Burden item	Average hours per activity <sup>a</sup>	Number of activities per year per respondent <sup>a</sup>	Technical hours per year per respondent <sup>a, b</sup>	Technical hours per year per respondent for wastewater	technical	Estimated manageria I hours per year (F=Ex0.05	clerical hours per	Total cost per year (\$) <sup>d</sup>
1. Familiarize with regulatory requirements	3.61	23	69	14	9,945	497	995	\$1,324,574.55
2. Plan activities	6.08	13	61	18	9,045	452	905	\$1,204,703.55
3. Training	5.25	4	17	4	2,475	124	248	\$329,645.25
4. Creation, testing, research, and development	17.85	99	1,617	150	225,045	11,252	22,505	\$29,973,743.55
5. Gather information, monitor/inspect	2.5	677	1,693	0	228,555	11,428	22,856	\$30,441,240.45
6. Process/compile and review	20	1	20	0	2,700	135	270	\$359,613.00
7. Complete reports	81.2	5	388	18	53,190	2,660	5,319	\$7,084,376.10
8. Record/disclose	17.46	26	442	12	60,210	3,011	6,021	\$8,019,369.90
9. Store/file	6.77	35	222	15	30,645	1,532	3,065	\$4,081,607.55
TOTAL LABOR BURDEN AND COST (rounded) °						720,000		\$82,800,000
TOTAL CAPITAL AND O&M COST (rounded) °								\$50,100,000
GRAND TOTAL (rounded) <sup>e</sup>								\$133,000,000

- <sup>a</sup> Average Hours per Activity (A) is back-calculated: (A) = ((C) + (D))/(B).
- $^{\mathrm{b}}\,$  There are 135 existing sources out of the 180 total that will continue to comply with the HON.
- <sup>c</sup> The 45 facilities complying with the CAR will still be required to comply with HON requirements for wastewater.

<sup>&</sup>lt;sup>d</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>&</sup>lt;sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. See Attachment I for assumptions and further description of activities.

# **Capital and O&M Costs for Referencing Subparts**

(A)	(B)	(C)	(D)	(E)	<b>(F)</b>	(G)
Subpart	Capital/ Startup Cost for One Respondent	Number of New Respondents with Capital/ Startup Costs	Total Capital/ Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
NSPS Ka	\$0	0	\$0	\$0	10	\$0
Subtotal	•					\$0
NSPS Kb a	\$13,500	1	\$13,500	\$1,350	234	\$316,366
Subtotal						\$330,000
NSPS VV	\$0	0	\$0	\$0	170	\$0
Subtotal	•			•		\$0
NSPS Vva <sup>b</sup>	\$1,400	1	\$1,400	\$0	65	\$0
Subtotal						\$1,400
NSPS DDD	\$30,000	5	\$150,000	\$7,000	78	\$546,000
Subtotal	•			•		\$696,000
NSPS III	\$13,500	1	\$13,500	\$1,350	39	\$52,650
Subtotal	•					\$66,200
NSPS NNN	\$13,500	9	\$121,500	\$1,350	127	\$171,450
Subtotal						\$293,000
NSPS RRR	\$25,000	5	\$125,000	\$500	69	\$34,500
Subtotal						\$160,000
NESHAP BB	\$0	0	\$0	\$0	54	\$0
Subtotal						\$0
NESHAP Y	\$0	0	\$0	\$0	4	\$0
Subtotal						\$0
NESHAP V	\$0	0	\$0	\$0	67	\$0
Subtotal						\$0
NESHAP F	\$0	0	\$0	\$0	0	\$0
Subtotal						\$0
NESHAP G	\$25,000	2	\$50,000	\$275,000	182	\$50,050,000
Subtotal						\$50,100,000
NESHAP H <sup>c</sup>	\$1,400	3	\$9,800	\$0	0	\$0
Subtotal						\$9,800
NESHAP I	\$0	0	\$0	\$0	0	\$0
Subtotal						\$0
CAR	\$0	0	\$0	\$275,000	45	\$12,375,000
Subtotal						\$12,400,000
CAR Revisions	\$0	0	\$0	\$0	6	\$0
Subtotal						\$0
Total for CAR and	\$64,000,000					

- <sup>a</sup> We assume that 5% of the 19 new respondents use a CVS as control, and that 5% of all existing storage tanks use a CVS as control. (413 existing respondents x 11.3 tanks per respondent x 5% tanks with CVS = 233)
- <sup>b</sup> We assume that 5 new process units are subject to NSPS Subpart VVa each year, and that 15 percent of all new sources are area sources, and that only area sources that construct new process units might purchase a monitoring instrument. (5 new respondents x 15% = 1 (rounded))
- $^{\rm c}$  We estimate that 80 percent of new facilities contract out LDAR services, and 20 percent perform in-house. The 2 facilities (rounded) which contract out will purchase one unit as backup. The 1 remaining facility (rounded) performing LDAR in-house will purchase 5 units to support the program. The total annual capital/startup cost is 7 units x 1,400 = 9,800.

For capital, these are tanks with CVS as control. Revised from 19 to 1.  For O&M, these are the 5% of existing and new tanks using CVS as control. Revised from 413 to 234.
Revised from 5 to 1. Only 15% of new sources purchase monitoring equipment.
Revised from 73 to 78
Revised from 38 to 39
Revised from 118 to 127
Revised from 64 to 69

Revised from 180 to 182

#### **Labor Rates**

Private					
Technical	Clerical				
\$120.27	\$141.06	\$58.67			

b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Agency					
Technical Managerial Clerical					
\$49.44	\$66.62	\$26.75			

<sup>&</sup>lt;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.