

**Annual Respondent Burden and Cost**

*Table 1 - Retailers, Wholesale Purchase-Consumers - Assuming 115K gas stations\* t*

Information Collection Activity		Hours and Cost			
<i>Citation</i>	<i>Activity</i>	<i>Standard Industry Mix Hours/Response</i>	<i>Clerical Only Hours/Response</i>	<i>Purchased Services Hours/Response</i>	<i>Total Cost/Response (dollars)</i>
40 CFR part 80, Subpart N - §80.1501	<b>Reporting:</b> Acquire (in some cases, purchase) and affix fuel label required for E15	0.00	0.01	0.01	2.08
40 CFR part 80, Subpart N - §80.1501	<b>Reporting:</b> Request alternative label	0.50	0.00	0.00	41.00
<b>GRAND TOTAL</b>					

Notes to the Table:

\* Source: MarketWatch: "How Many Gas Stations are there in the the U.S.? How Many Will There Be in 10 ?" <https://www.marketwatch.com/story/how-many-gas-stations-are-in-us-how-many-will-there-be-in-10-years-2020-09-16> Accessed September 16, 2020.

\*\* Source: Email from Growth Energy to EPA, October 9, 2019, "Growth Energy Higher Blend Infrastructure

List by Type of Party						
that sell fuel (retail and wp-c) and 1,800 retail outlets selling E15**						
Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/ Year	Total Cost/Year		
1,800	1	1,800	36	3,744	No Form; format of label is specified. Assumed all 1,800 E15 stations change label, assumed a 1% subset of 115K retail stations add E15 each year. Assumes label cost equivalent to 0.01 PS.	2,952
1	1	1	0.5	41	Request for alternative labels are expected to be very rare, we assume one per year. Assumes this is a labor cost only.	0
<b>1,801</b>		<b>1,801</b>	<b>37</b>	<b>3,785</b>		<b>2,952</b>

Years?"

020-02-16

Available in the docket for this action.

<b>Labor Costs</b>				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour<sup>a</sup></i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial (CEO - 11-1011)	104.23	209	0.05	10.45
Professional/Technical (Refinery Operators - 51-8093)	38.29	77	0.7	53.9
Clerical (Administrative Assistants 43-6010)	21.75	44	0.2	8.8
Legal (Lawyer 23-1011)	83.03	167	0.05	8.35
<b>Total Employer Cost/hour</b>				<b>82</b>
<b>Purchased Services<sup>b</sup></b>				<b>164</b>

<sup>a</sup> Overhead is calculated to be equal to the cost of labor.

<sup>b</sup> The cost of purchased services (for example, cost of attest auditors) is calculated at twice the Employer Cost.

These estimates use Bureau of Labor Statistics figures from the "National Industry-Specific Occ Employment Estimate - Petroleum and Coal Products Manufacturing - May 2019" (March 2020 (Updated from NPRM to FRM to reflect newer BLS figures now available.)

Median hourly wage is used.

Total

Operational Wage and  
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