

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**Standards of Performance for Volatile Organic Liquid Storage Vessels (Including
Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or
Modification Commenced After July 23, 1984 (40 CFR Part 60, Subpart Kb)
(Proposed Amendments)
August 2020**

1. Identification of the Information Collection

1(a) Title of the Information Collection

Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR Part 60, Subpart Kb) (Proposed Amendments), EPA ICR Number 1854.12, OMB Control Number 2060-0443.

1(b) Short Characterization/Abstract

On July 23, 1984, the U.S. Environmental Protection Agency (EPA) proposed updated new source performance standards (NSPS) to reduce volatile organic compound (VOC) emissions from storage vessels as 40 CFR Part 60, Subpart Kb. These standards were promulgated on April 8, 1987 (see 52, FR 11429), amended several times, and last amended on October 15, 2003. These standards apply to storage vessels constructed after July 23, 1984, that have capacity greater than or equal to 75 cubic meters (20,000 gallons) used to store volatile organic liquids (including petroleum liquids) with a true vapor pressure greater than or equal to 3.5 kilopascals (kPa) [or 0.5 pounds per square inch absolute (psia)]. The NSPS also applies to organic liquid storage vessels between 20,000 and 40,000 gallons capacity for which the true vapor pressure of the stored liquid is greater than or equal to 15 kPa (2.2 psia). The NSPS specifies monitoring requirements for all affected storage vessels. For storage vessels with a capacity of 20,000 gallons or more that store organic liquids with a true vapor pressure over 27.6 kPa (4.0 psia) and for storage vessels with a capacity of 40,000 gallons or more that store organic liquids with a true vapor pressure over 5.2 kPa (0.75 psia), NSPS Kb requires the use of either an internal floating roof (IFR), an external floating roof (EFR), or a closed vent system to a control device.¹ The NSPS specifies inspection requirements for each control scenario.

Additional amendments to the NSPS are being proposed to reduce burden on storage vessel owners or operators. The proposed revisions apply only to affected storage vessels that have IFRs or EFRs. However, the anticipated reduction in burden is anticipated to be realized only by vessels with an IFR. For IFR storage vessels with a liquid-mounted or mechanical shoe primary seal, visual inspections of the floating roof conducted through manholes and roof hatches on the fixed roof (referred to as “top-side inspections”) are required at least every 12 months. Inspection of the floating roof from within the fixed roof storage vessel (referred to as “internal inspections”) is required every time the storage vessel is emptied and degassed, but at

¹ All affected storage vessels storing organic liquids with a true vapor pressure of 76.6 kPa (11.1 psia) or more must use a closed vent system to a control device.

no time at intervals greater than once every 10 years. IFR storage vessels with double (vapor mounted) seals must either comply with the annual top-side inspection and an internal inspection (as described above) at least once every 10 years, or alternatively conduct internal inspection of the floating roof every time the storage vessel is emptied and degassed, but at no time at intervals greater than once every 5 years. The proposed revisions will remove the time period thresholds for emptying and degassing events, so internal inspections are only required when the storage vessel is emptied and degassed regardless of the interval between degassing events. Other portions of the NSPS remain unchanged. For a full description of the proposed alternative standard, see the preamble for the proposed rule.

In general, all NSPS require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner/operator subject to the provisions of this NSPS shall maintain a file containing these documents and retain the file for at least two years (except control device operating plan, which is required for the life of the control device). All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

The “Affected Public” are owners or operators of facilities that have volatile organic liquid storage vessels that meet the size and vapor pressure thresholds in the NSPS. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. These are all privately-owned, for-profit businesses. The burden to the Affected Public for the proposed amendments may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) (Proposed Amendments). The burden to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. There is no change in burden to the Federal Government as a result of the proposed amendments.

The EPA estimated that there are currently 3,500 IFR storage vessels subject to the NSPS that may be impacted by the proposed amendments. The EPA further estimates that 10 percent or 350 of these IFR storage vessels would be subject to mandated internal inspections every 5 years and the remainder (3,150) would be subject to mandated internal inspections every 10 years. These estimates are based on the research conducted by the EPA during various rulemaking efforts, particularly the Refinery Sector Rule risk and technology review (40 CFR Part 63 Subparts CC and UUU) and the Consolidated Air Rule (CAR) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) (40 CFR Part 65). While new storage vessels may become subject to the standard over the 3-year period covered by this ICR, none of the new storage vessels are expected to be empty and degassed in the first three years of service. As such, owners or operators of these new storage vessels would not have revised impacts as a result of the proposed technical amendments in the 3-year period of this ICR. The EPA estimates that approximately 385 sources per year ($350/5 + 3,150/10$) will be subject to a revised burden as a

result of the proposed amendments.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance”.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

“. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.” Section 111(a)(1).

. In the Administrator’s judgment, volatile organic compounds (VOC) emissions from storage vessels cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category initially at 40 CFR Part 60, Subpart K, then Subpart Ka, and most recently Subpart Kb.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NSPSP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 60 NSPS General Provisions (40 CFR Part 60, Subpart A). CAA Section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

2(b) Practical Utility/Users of the Data

Initial and subsequent periodic inspections are required in order to ensure the control

systems are properly installed and operating effectively.

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated.

The recordkeeping and reporting requirements are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections and is of sufficient quality to be used as evidence in court.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart Kb.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

The ICR will be available for public review during the public comment period following publication of the proposed amendments to 40 CFR Part 60, Subpart Kb, in the *Federal Register*. The ICR for the final rule will respond to any comments received on the ICR.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected sources and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Stakeholder outreach occurred with industry groups under previous related rulemaking activities. Further stakeholder and public input are expected through public comment following publication of the proposed amendments to 40 CFR Part 60, Subpart Kb in the *Federal Register* and follow-up meetings with interested stakeholders.

3(d) Effects of Less-Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards and the proposed amendments was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements and the proposed amendments do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least two years. The retention of records allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. In addition, the EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of a records maintenance requirement.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements or the proposed amendments contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements and the proposed

amendments are owners or operators of volatile organic liquid storage vessels. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for facilities likely to have volatile organic liquid storage vessels are provided in the following table.

All Referenced Subparts	SIC Codes	NAICS Codes
Plastics Material and Resin Manufacturing	2821	325211
Artificial and Synthetic Fibers and Filaments Manufacturing	2824	325220
Paint and Coating Manufacturing	2851	325510
Petrochemical Manufacturing	2865, 2869	325110
Synthetic Dye and Pigment Manufacturing	2865	325130
Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing	2865	325194
Ethyl Alcohol Manufacturing	2869	325193
Other Basic Organic Chemical Manufacturing	2869, 2899	325199
Petroleum Refineries	2911	324110
Asphalt Paving Mixture and Block Manufacturing	2951	324121
Asphalt Shingle and Coating Materials Manufacturing	2952	324122
Petroleum Lubricating Oil and Grease Manufacturing	2992	324191
All Other Petroleum and Coal Products Manufacturing	2999	324199
Specialized Freight (except Used Goods) Trucking, Local	4212, 4214	48422
General Freight Trucking, Long-Distance, Truckload	4213	484121
General Freight Trucking, Long-Distance, Less Than Truckload	4213	484122
Specialized Freight (except Used Goods) Trucking, Long-Distance	4213	48423
Refrigerated Warehousing and Storage	4222, 4226	49312

All Referenced Subparts	SIC Codes	NAICS Codes
General Warehousing and Storage	4225, 4226	49311
Other Warehousing and Storage	4226	49319
Other Support Activities for Road Transportation	4231, 4785	48849
Deep Sea Freight Transportation	4412	483111
Coastal and Great Lakes Freight Transportation	4424, 4432	483113
Inland Water Freight Transportation	4449	483211
Deep Sea Passenger Transportation	4481	483112
Coastal and Great Lakes Passenger Transportation	4481, 4482	483114
Inland Water Passenger Transportation	4482, 4489	483212
Scenic and Sightseeing Transportation, Water	4489	48721
Port and Harbor Operations	4491	48831
Marine Cargo Handling	4491	48832
Navigational Services to Shipping	4492, 4499	48833
Marinas	4493	71393
Commercial Air, Rail, and Water Transportation Equipment Rental and Leasing	4499, 4741	532411
Other Support Activities for Water Transportation	4499, 4785	48839
Pipeline Transportation of Refined Petroleum Products	4613	486910
Support Activities for Rail Transportation	4741, 4789	48821
Petroleum Bulk Stations and Terminals	5171	424710
Fuel Dealers	5171	454310

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by the NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) or would be required under the proposed amendments. The specific requirements relevant to the proposed amendments include:

Requirement	Regulation Reference (40 CFR Part 60)
Inspection Requirements	
Visual, external IFR inspection	§60.113b(a)(2)
Internal IFR inspection	§60.113b(a)(4)
Notifications	
Notifications for request for inspection to repair IFR	§60.113b(a)(2)
Reports	
Inspection report if IFR failure/defect observed	§60.115b(a)(3) and (4)
Recordkeeping	
Records of inspections	§60.115b(a)(2)
Records retention policy (two years)	§60.115b

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Perform initial and ongoing inspections.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.

Respondent Activities
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Observe initial and ongoing inspections if necessary.
Review notifications and reports required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of the startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The inspection reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the

impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. The NSPS does not apply to small storage vessels (less than 20,000 or 40,000 gallons capacity, depending on vapor pressure of vessel contents). The EPA expects that small entities will be more likely to have storage vessels below the size threshold, resulting in reduced burden. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities if they have affected sources. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) (Proposed Amendments).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart's proposed amendments included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Only the incremental burdens associated with the proposed amendments are included. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be -6,210 hours (a net burden reduction; see Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the NSPS amendments, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Industry Worker Category ^a	Labor Rates, \$/hr ^b	110% Overhead	Total, \$/hr
Managerial (11-0000)	\$68.90	\$75.49	\$144.69
Technical (17-2081; 49-0000) ^c	\$35.12	\$38.63	\$73.75
Clerical (43-0000)	\$22.90	\$25.19	\$48.09

^a Numbers in parenthesis are the specific BLS occupation codes used to estimate the hourly rates.

^b Rates are mean hourly rates for May 2019 and are averaged between chemical manufacturing (https://www.bls.gov/oes/current/naics3_325000.htm) and petroleum and coal products manufacturing (https://www.bls.gov/oes/current/naics3_324000.htm) rates.

^c Technical rates are blended rates between Environmental Engineer (BLS code 17-2081; 20 percent) and Installation, Maintenance, and Repair (BLS code 49-0000; 80 percent) segment NAICS 331500 as provided at https://www.bls.gov/oes/current/naics4_331500.htm.

Labor rates and associated costs are based on the Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the May 2019 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 (Chemical Manufacturing) and NAICS 326000 (Petroleum and Coal Products Manufacturing). The technical rates are further blended between environmental engineer (20 percent) and maintenance and repair staff (80 percent). The BLS rates represent base salaries and do not include the cost of fringe benefits and other overhead costs. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with operating and maintaining emission control and monitoring systems. The capital/startup costs are one-time costs when a facility becomes subject to these regulations, which are not proposed to be amended. The annual operation and maintenance costs are the ongoing costs to operate degassing control systems, if required by the local regulatory agency.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Operating and maintenance (O&M) costs are incurred when storage vessel degassing emissions must be controlled to comply with local agency requirements. Generally, control of degassing emissions is conducted by contracted services. The cost of degassing services is dependent on the size of the storage vessel. The EPA estimated the average cost for degassing services per storage vessel is \$7,400.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Control System	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (D=BxC)	(E) Annual O&M Cost for One Respondent	(F) Number of Respondents with O&M ^a	(G) Total O&M Cost (G=ExF)
Degassing control	\$0	0	\$0	\$7,400	-63	(\$466,200)
Total ^b			\$0			(\$466,000)

^a Assumes 30 percent of additional degassing events avoided or a total of 63 fewer storage vessels per year would be required to have controlled degassing emissions as a result of the proposed amendments.

^b Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$466,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$466,000. These costs are included in the grand total cost in Table 1.

6(c) Estimating Agency Burden and Cost

The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The proposed amendments are not expected to alter the Agency's burden.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 385 existing sources will be able to benefit from the alternative standard as a result of the

proposed amendments. It is estimated that no additional respondents per year will realize a reduction in burden as a result of the proposed amendments over the next three years. The overall average number of respondents, as shown in the table below, is 385 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	385	0	0	385
2	0	385	0	0	385
3	0	385	0	0	385
Average	0	385			385

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3-year period of this ICR is 385.

The total number of annual responses per year is not expected to change as a result of the proposed amendments. Owners and operators of affected storage vessels must provide an inspection report if damage or defects are detected in the IFR. As defects can be identified by either type of inspection, the number of defect reports is not expected to change. The change in the number of Total Annual Responses is 0.

The total annual labor cost savings are \$464,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) (Proposed Amendments).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are summarized below.

(i) Respondent Tally

The total annual labor hours are -6,210 hours. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NSPS for Volatile Organic

Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) (Proposed Amendments).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve compliance activities. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to support technical staff needs, make copies and maintain records.

The total annual capital/startup and O&M costs to the regulated entities are \$466,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

There is no change in the average annual Agency burden and cost over next three years as a result of the proposed amendments.

6(f) Reasons for Change in Burden

This ICR is prepared for proposed amendments to the NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb). The proposed amendments would allow owners or operators of storage vessels subject to NSPS Kb, and equipped with either an EFR or IFR, to elect to comply with the requirements specified in NESHAP WW as an alternative standard, in lieu of the requirements specified in NSPS Kb. Among other things, the proposed alternative will allow owners or operators of storage vessels subject to NSPS Kb that are equipped with an IFR, and that can meet the visual access requirement of NESHAP WW, to conduct the top-side visual inspection pursuant to NESHAP WW, thereby avoiding the need to empty and degas the vessel for the sole purpose of conducting the inspection. For a full description of the proposed alternative standard, see the preamble for the proposed rule. Where applicable, adjustments for these proposed amendments are reflected in Table 1 of this ICR.

6(g) Burden Statement

The annual change in the monitoring, reporting and recordkeeping burden for this collection of information is estimated to average -16.1 hours per respondent. "Burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a

collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2020-0372. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. Out of an abundance of caution for members of the public and our staff, the EPA Docket Center and Reading Room are closed to the public, with limited exceptions, to reduce the risk of transmitting COVID-19. Our Docket Center staff will continue to provide remote customer service via email, phone, and webform. We encourage the public to submit comments via <https://www.regulations.gov/> or email, as there may be a delay in processing mail and faxes. For further information on EPA Docket Center services and the current status, please visit us online at <https://www.epa.gov/dockets>. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2020-0372 and OMB Control Number 2060-0443 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NSPS for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) (Proposed Amendments)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per year, (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Familiarize with regulatory requirements ^c	No change							\$0
b. Required activities ^d								
i. Additional top-side inspections ^a	8	1	8	385	3080	154	208	\$264,244
ii. Additional internal inspections ^a	12	1	12	-385	-4620	-231	-462	(\$331,506)
iii. Emptying/Degassing ^e	18.4	1	18.4	-210	-3864	-193.2	-386.4	(\$396,366)
c. Create information ^f	No change							\$0
d. Gather existing information ^f	No change							\$0
e. Write report ^f	No change							\$0
Subtotal for Reporting Requirements						-6,214.6		(\$463,628)
4. Recordkeeping requirements ^f	No change							\$0
Subtotal for Recordkeeping Requirements						0		\$0
TOTAL LABOR BURDEN AND COST (rounded) ^g						-6,210		(\$464,000)
CAPITAL AND O&M COST (rounded) ^g								(\$466,000)
GRAND TOTAL (rounded) ^g								(\$930,000)

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to revised requirements will be 385 per year. This is based on our estimate of 3,500 existing IFR storage vessels subject to the NSPS. We have assumed 10 percent or 350 storage vessels would be subject to the 5-year internal inspection requirement and the remainder (3,150) subject to the 5-year internal inspection requirement. We have assumed that there will be no change in impacts for any new sources during the next three years of this ICR. Therefore, the annual number of impacted inspections is $350/5 + 3150/10 = 385/\text{year}$
- ^b This ICR uses the following labor rates based on the Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the May 2019 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 (Chemical Manufacturing) and NAICS 326000 (Petroleum and Coal Products Manufacturing). The technical rates are further blended between environmental engineer (20 percent) and maintenance and repair staff (80 percent). The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Fully burdened hourly rates are: \$144.69 for management; \$73.75 for technical; and \$48.09 for clerical.
- ^c The previous ICR assumed that all respondents will have to familiarize with regulatory requirements each year. There are no changes in this burden.
- ^d We have listed only those activities that are impacted by the proposed amendments. There are other required activities required by the NSPS.
- ^e We assumed degassing would occur every 20 years for maintenance in the absence of the internal inspection requirement. Without the internal inspection requirement, there would be 175 degassing and emptying events per year ($3500/20$). Therefore, the change in the number of degassing and emptying events is 210 per year ($385-175$).
- ^f We assumed there would be no changes in these requirements as a result of the proposed amendments.
- ^g Total burden and costs have been rounded to 3 significant digits. Figures may not add exactly due to rounding.