

Table 1: Annual Respondent Burden and Cost – NSPS for Volatile Organic Liquid Storage Vessels

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
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
a. Familiarize with regulatory requirements ^c	No change			
b. Required activities ^d				
i. Additional top-side inspections ^a	8	1	8	385
ii. Additional internal inspections ^a	12	1	12	-385
iii. Emptying/Degassing ^e	18.4	1	18.4	-210
c. Create information ^f	No change			
d. Gather existing information ^f	No change			
e. Write report ^f	No change			
Subtotal for Reporting Requirements				
4. Recordkeeping requirements ^f	No change			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ^g				
CAPITAL AND O&M COST (rounded) ^g				
GRAND TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that the average number of respondents that will be subject to revised requirements will be 385 per year for 385 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. We have assumed that there will be no change in impacts for any new sources during the 5-year period. The 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 professional rates are taken from the May 2019 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 (Coal Products Manufacturing). The technical rates are further blended between environmental engineer (20 percent) and maintenance technician (80 percent) and increased by 110 percent to account for the benefit packages available to those employed by private industry. Fully burdened 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 new sources.

^d We have listed only those activities that are impacted by the proposed amendments. There are other required activities related to the NSPS that are not impacted.

^e We assumed degassing would occur every 20 years for maintenance in the absence of the internal inspection requirement. There are 175 degassing and emptying events per year ($3500/20$). Therefore, the change in the number of degassing and emptying events is $175 - 175 = 0$.

^f We assumed there would be no changes in these requirements as a result of the proposed amendments.

^g Totals burden and costs have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Foundries

gov/oes/current/naics4_331500.htm

110%

Mean Hourly Rate	Overhead	Estimated Total Pay with Benefits
68.9	75.79	144.69
35.12	38.63	73.75
22.9	25.19	48.09
51.14		107.39
31.11		65.33

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B x C)	Annual O&M Costs for One Respondent
Degassing Controls	\$0	0	\$0	\$7,400
Total ^b			\$0	

^a Assumes 30 % or 63 controlled degassing events are avoided per year.

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

Costs

(F)	(G)
Number of Respondents with O&M	Total O&M, (E x F)
-63	(\$466,200)
	(\$466,000)

Information Collection Activity	Number of Respondents	Number of Responses
Initial Notification	0	0
Notification of Compliance Status	0	0
Notification of Foundry Reclassification	0	0
Notification of Performance Test for PM ^a	0	0
Inspection reports	0	0
Semiannual compliance reports	0	0
Total	385	

Average

Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
	E=(BxC)+D
0	0
0	0
0	0
0	0
385	385
0	0
	385

3500	0.02	70
3500	0.09	315

ge response burden -16.14 hrs