

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal),
EPA ICR Number 0664.13, OMB Control Number 2060-0006.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) were proposed December 17, 1980; promulgated on August 18, 1983; and amended on December 19, 2003. These regulations apply to the total of all loading racks at bulk gasoline terminals, which deliver liquid product into gasoline tank trucks, and for which construction, modification, or reconstruction commenced after the date of proposal. A bulk gasoline terminal is any gasoline facility which receives gasoline by pipeline, ship, or barge, and has a gasoline throughput greater than 75,700 liters per day. The affected facility includes the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tank trucks. New facilities include those that commenced either construction, or modification, or reconstruction after the date of proposal. These standards set initial notification, initial performance test, and ongoing recordkeeping requirements. This information is being collected to assure compliance with 40 CFR Part 60, Subpart XX.

In general, all NSPS standards require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of both the occurrence and duration of any startup, 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 affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain this file for at least two years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 214 bulk gasoline terminal facilities, which are owned and operated by the bulk gasoline terminal industry (aka: the "Affected Public"). None of the 214 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all privately-owned, for-profit businesses. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal). The Federal Government's "burden" is

attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal). We assume that they will all respond.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 214 existing respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. The number of existing respondents in this ICR has been adjusted based on data collected from EPA's Enforcement and Compliance History Online (ECHO) database, and accounts for growth within the oil and gas industry since the rule's promulgation.

The Office of Management and Budget (OMB) approved the currently-active 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).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

In addition, 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.

In the Administrator's judgment, volatile organic compounds (VOC) emissions from bulk gasoline terminals either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart XX.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standards are used to inform the Agency or its delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

The required monthly leak detection inspections and recordkeeping are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

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

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

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (85 FR 28003) on May 12, 2020. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities 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. Approximately 214 existing respondents, and no new respondents per year, will be subject to these same standards over the three-year period covered by this ICR. The number of existing respondents in this ICR has been adjusted based on data collected from EPA's Enforcement and Compliance History Online (ECHO) database, which included a review of active facilities under North American Industry Classification System (NAICS) code 424710 (Petroleum Bulk Stations and Terminals) and with Emission Inventory System IDs that are subject to 40 CFR Part 60, Subpart XX, as reported to ICIS.¹

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: the American Petroleum Institute, at (202) 682-8000; the American Fuel and Petrochemical Manufacturers, at (202) 457-0480; and the Oil Price Information Service, at (301) 284-2000.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that

¹ To confirm the increase in the number of respondents, this estimate was also compared to the number of active facilities under NAICS code 424710 subject to reporting under similar EPA regulations that apply to bulk gasoline terminals, including 40 CFR Part 63, Subparts R (Gasoline Distribution Facilities) and BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities), as well as other resources, such as the Department of Homeland Security's Homeland Infrastructure Foundation-Level Data (HIFLD) for petroleum terminals. The number of new respondents per year has not been adjusted due to uncertainty in current industry trends.

facilities are continuing to meet these 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 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 do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are bulk gasoline terminals. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 5171 which corresponds to the North American Industry Classification System (NAICS) 424710 for petroleum bulk stations and terminals.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX).

A source must make the following reports:

Notifications and Reports	
Notification of construction/reconstruction	§60.7(a)(1)

Notifications and Reports	
Notification of actual startup	§60.7(a)(3)
Notification of physical or operational change	§60.7(a)(4)
Notification of performance test	§60.8(d)
Notification of compliance status	§60.8(g)
Notifying the owner or operator of each non-vapor-tight gasoline truck loaded	§60.502(e)(4)
Report of performance test results	§60.8(a)

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, or malfunction period where the continuous monitoring system is inoperative	§60.7(b)
Record of documentations for tank trucks vapor tightness – kept on permanent record	§60.502(e)(1), §60.505(a)
Record the tank identification number as each gasoline tank truck is loaded	§60.502(e)(2)
Record each leak detected during each calendar month inspection of control equipment during loading operations	§60.502(j)
Annual update of records of tank truck vapor tightness	§60.505(b)
Record of monthly leak inspections of control equipment for loading operations required for 2 years	§60.505(c)
Record of notification under §60.502(e)(4) for 2 years	§60.505(d)
Records of replacement parts or additions of components performed on an existing vapor processing system for 3 years	§60.505(f)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.

Respondent Activities
Install, maintain, and operate a continuous vapor collection system and liquid loading equipment designed to collect the vapors displaced from tank trucks, and maintain a pressure measurement device.
Perform initial performance test, Reference Method 2A, 2B, 18, 21, 25A or 25B, and 27 tests, and repeat performance tests if necessary.
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions 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 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 standards and to 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 startup, shutdown, and malfunction records and leak detection records 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The 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

The 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. 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. 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

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 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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 70,900 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulation, 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:

Managerial	\$148.45 (\$70.69 + 110%)
Technical	\$121.46 (\$57.84 + 110%)
Clerical	\$60.23 (\$28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, “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.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in these regulations are labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 average annual Agency cost during the three years of the ICR is estimated to be \$0.

This cost is based on the average hourly labor rate as follows:

Managerial	\$68.37 (GS-13, Step 5, \$42.73 + 60%)
Technical	\$50.72 (GS-12, Step 1, \$31.70 + 60%)

Clerical \$27.46 (GS-6, Step 3, \$17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

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, an average of 214 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 214 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	214	0	0	214
2	0	214	0	0	214
3	0	214	0	0	214
Average	0	214	0	0	214

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 three-year period of this ICR is 214.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notifications	0	1	N/A	0
Report of performance test	0	1.1	N/A	0
Periodic reports	0	1	N/A	0
Records of operations	214	0	214	214
			Total	214

The number of Total Annual Responses is 214.

The total annual labor costs are \$8,320,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

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 shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 70,900 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

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 reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 331 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be zero labor hours at a cost of \$00.00; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

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 reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred because of an increase in the number of existing respondents. The number of existing respondents in this ICR has been adjusted based on data collected from EPA's Enforcement and Compliance History Online (ECHO) database. A review of the ECHO data based on NAICS code 424710 (Petroleum Bulk Stations and Terminals), availability of EIS ID, identification as subject to Subpart XX, and reported to the National Emissions Inventory identified approximately 214 active sources. This ICR reflects a more accurate estimate of the number of existing respondents. The number of new respondents per year has not been adjusted due to uncertainty in current industry trends. The overall result is an increase in burden hours and costs. There is also an increase in costs due to the use of updated labor rates. This ICR uses labor rates from a more- recent Bureau of Labor Statistics report (March 2020) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 331 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0027. 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. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. 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, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2014-0027 and OMB Control Number 2060-0006 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 Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

Burden item	(A) Person hours per occurrence	(B) No. of occurrence s per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondent s per year ^a	(E) Technical person- hours per year (C x D)	(F) Managemen t person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements ^c								
Existing sources	2	1	2	214	428	21	43	\$57,739.55
New Sources	8	1	8	0	0	0	0	\$0
B. Required activities								
Initial performance tests ^d	60	1	60	0	0	0	0	\$0
Repeat of performance tests ^d	60	0.1	6	0	0	0	0	\$0
Monitoring of operations and equipment ^e	See 4E							
C. Gather existing information	See 3B and 4E							
D. Write Report								
Notification of compliance status ^{d, f}	2	1	2	0	0	0	0	\$0
Notification of actual startup ^f	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^f	2	1	2	0	0	0	0	\$0
Report of performance test results ^d	See 3B							
Operation and maintenance reports	N/A							
Annual/Semiannual reports ^g	N/A							
Subtotal for Reporting Requirements						492		\$57,740
4. Recordkeeping requirements								

A. Familiarization with Regulatory Requirements	See 3A							
B. Plan Activities	See 3A							
C. Implement Activities	See 3A							
D. Develop record system	N/A							
E. Time to enter information								
Records of startup, shutdown, malfunction ^h	1.5	50	75	214	16,050	803	1,605	\$2,165,233.28
Record of tank identification numbers ⁱ	0.1	2,100	210	214	44,940	2,247	4,494	\$6,062,653.17
Leak detection records of monthly control equipment inspections ^j	0.1	12	1.2	214	257	13	26	\$34,643.73
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						70,434		\$8,262,530
Total Labor Burden and Costs (rounded)^k						70,900		\$8,320,000
Total Capital and O&M Cost (rounded)^k								\$0
GRAND TOTAL (rounded)^k								\$8,320,000

Assumptions:

^a We assume that there are an average of 214 existing sources that are subject to the standard over the three-year period of this ICR. We assume that there will be no new or reconstructed or modified sources per year over the three-year period of this ICR.

^b This ICR uses the following labor rates for privately-owned sources: \$148.45 for managerial, \$121.46 for technical, and \$60.23 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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.

^c We assume that all existing respondents will take 2 hours each year to re-familiarize with the rule. We assume that all new respondents will take 8 hours to familiarize with the rule.

^d We have assumed that it will take 60 hours for each new respondent to perform initial performance tests and submit the report. We assume that 10 percent of new sources will need to repeat the test due to failure.

^e Monitoring of operations includes: implementation of Standards Operating Procedures (SOP) for operation and maintenance of control equipment; records of tank identification numbers and monthly leak detection inspection of control equipment.

^f Per §60.8(g), compliance status is determined by the permitting authority on examination of the performance test results. §60.7(a)(1) requires notification of the date of construction/reconstruction. §60.7(a)(3) requires notification of the date of actual startup.

^g NSPS Subpart XX does not require annual or semiannual reporting.

^h We assume that it will take 1.5 hours, fifty times per year, for each respondent to maintain SSM records.

ⁱ We assume that each respondent will take 0.1 hour or 6 minutes to enter each tank identification number. We assume an average of six tank truck loadings each day for 350 days a year. (6 loadings/day x 350 days/year = 2,100 loadings/year)

^j We assume that each respondent will take 6 minutes to record leak detection information twelve times per year.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX) (Renewal).

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Initial notifications ^c	2	1	2	0	0	0	0	\$0
Report of performance test results ^d	8	1	8	0	0	0	0	\$0
Semiannual reports ^e	N/A							
TOTAL (rounded)^f						0		\$0

Assumptions:

^a We assume that there are an average of 214 existing sources that are subject to the standard over the three-year period of this ICR. We assume that there will be no new or reconstructed or modified sources per year over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$68.37 for managerial, \$50.72 for technical, and \$27.46 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 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.

^c New /modified/reconstructed sources are required to submit notifications of construction/reconstruction, actual startup, and compliance status.

^d New sources are required to submit performance test results. We assume 10 percent of new sources will repeat the test due to failure. (10 + 10 x 0.1 = 11)

^e The rule does not require periodic reporting.

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