

Summary			
<i>Type of Respondent</i>	<i>Total Responses per Year</i>	<i>Total Hours per Year</i>	<i>Total Cost per Year (Labor and Non-Labor)</i>
Biointermediate Producers	33,305	34,657	\$3,434,074
RIN Generators (Renewable Fuel Producers)	21,542	11,566	\$1,298,692
Biointermediate Importer	1,360	1,765	\$250,460
Third Parties	0	0	\$0
GRAND TOTAL	56,207	47,988	\$4,983,226

* Third parties are counted as respondents, but their responses/hours/\$ are assigned to the party for whom they do the work. (Purchased service providers.)

TOTAL NUMBER of Respondents:	1,670.00
Non-Labor Costs* Only - Used for OMB Inventory:	2,828,180.00

*Non-Labor Costs include capital, O&M, and purchased services. For this collection, all are purchased services. These costs are reflected in the "OMB Inventory."

Annual Respondent Burden and Cost by Type of Party												
Table 1 -Biointermediate Producers* - assumes 60 total foreign and domestic												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	\$ Non-Labor Costs (Purchased Services)
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year**	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year (Labor and Non-Labor)		
	Reporting Activities											
80.1416	Pathways Petition: new renewable fuels/feedstocks by biointermediate producers (any party can petition, but we anticipate biointermediate producers will be petitioners) - 52 hours total/ 3 years to annualize	14.00	0.00	0.00	1148.00	2.00	1.00	2.00	28.00	2296.00	Screening tool at https://www.epa.gov/renewable-fuel-standard-program/renewable-fuel-pathway-screening-tool ; actual submission is CBP and sent via CDX.	0.00
80.1450(b) and 40 CFR 1090.805	Registration: Initial registration of new biointermediate producers - company and facility information	2.00	0.00	0.00	164.00	60.00	1.00	60.00	120.00	9840.00	TeRRA (OTAQREG)	0.00
80.1450(b) and 40 CFR 1090.805	Registration: Initial registration of new biointermediate producers - detailed description of biointermediates and processes from registrant - 12 hours total / 3 years to annualize	4.00	0.00	0.00	328.00	60.00	1.00	60.00	240.00	19680.00	TeRRA (OTAQREG)	0.00
80.1450(b) and 40 CFR 1090.805	Registration: Initial registration of new biointermediate producers - engineering review - 52 hours total / 3 years to annualize	0.00	0.00	14.00	2296.00	60.00	1.00	60.00	840.00	137760.00	TeRRA (OTAQREG) - refer to Table IV as well, as these are submitted by third party engineers on behalf of the respondents.	137760.00
80.1450(d) and 40 CFR 1090.805	Registration: Update to existing registrations (should be uncommon since these are new registrants, in case of error, change of address)	1.00	0.00	0.00	82.00	3.00	1.00	3.00	3.00	246.00	TeRRA (OTAQREG)	0.00
80.1450(b) and 80 CFR 1090.805	Registration: Set up account in CDX - new biointermediate producer registrants	1.00	0.00	0.00	82.00	60.00	1.00	60.00	60.00	4920.00	TeRRA (OTAQREG)	0.00
80.1450 and 80 CFR 1090.805, 80.1476, 80.1479	Registration: Updates to existing registrations to associate with third party auditor	0.50	0.00	0.00	41.00	60.00	1.00	60.00	30.00	2460.00	TeRRA (OTAQREG)	0.00
80.1450 and 80 CFR 1090.805, 80.1476, 80.1479	Registration: Updates to existing registrations to associate with QAP provider	0.50	0.00	0.00	41.00	60.00	1.00	60.00	30.00	2460.00	TeRRA (OTAQREG)	0.00
80.1451	Reporting: RFS0702 quarterly Co-Products reports for biointermediate producers	4.00	0.00	0.00	328.00	60.00	4.00	240.00	960.00	78720.00	RFS0702	0.00
80.1451	Reporting: RFS0801 quarterly Renewable Biomass Report for biointermediate producers	4.00	0.00	0.00	328.00	60.00	4.00	240.00	960.00	78720.00	RFS0802	0.00

80.1451	Reporting: quarterly RFS4000 Biointermediate Batch Reporting for biointermediate producers	8.00	0.00	0.00	656.00	60.00	4.00	240.00	1920.00	157440.00	RFS4000	0.00
80.1453	Generating product transfer documents related to biointermediates	1.00	0.00	0.00	82.00	60.00	260.00	15600.00	15600.00	1279200.00	CBP	0.00
80.1464	Attest Engagements for biointermediate producers - all purchased services	0.10	0.00	24.00	3944.20	60.00	1.00	60.00	1446.00	236652.00	ATT0100 - refer to Table IV - Third Parties as well - these are submitted by a third party auditors on behalf of these respondents	236652.00
80.1469	Participation in QAP program for biointermediate producers - all purchased services	0.00	0.00	120.00	19680.00	60.00	1.00	60.00	7200.00	1180800.00	QAP forms 2000, 2200, 2300, 2400 - refer to Table IV as well - these are submitted by QAP providers on behalf of these respondents	1180800.00
	Recordkeeping Activities											
80.1453	Initial programming of new PTD statements 24 hours total / 3 years to annualize cost	8.00	0.00	0.00	656.00	60.00	1.00	60.00	480.00	39360.00	CBP	0.00
80.1453	Retention of PTDs	0.00	0.25	0.00	11.00	60.00	260.00	15600.00	3900.00	171600.00	CBP	0.00
80.1454	General recordkeeping related to biointermediate production and transfers	0.00	1.00	0.00	44.00	60.00	12.00	720.00	720.00	31680.00	CBP	0.00
80.1478	Additional requirements for foreign biointermediate producers, including signed commitments/affirmations	0.00	1.00	0.00	2.00	10.00	12.00	120.00	120.00	240.00	TeRRA (OTAQREG) for submission of registration material and CBP	0.00
GRAND TOTAL												1,555,212.00

Notes to the Table:

*Respondent count is an estimate of the total at end of year 3 of the ICR, since these parties are not yet registered.
Assumes 60 respondents, total.

** Assumes 260 days for daily R&R activities.

Annual Respondent Burden and Cost by Type of Party												
Table 2 - RIN Generators - Renewable Fuels Producers that Use Biontermediates to Produce Renewable Fuel *												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	\$ Non-Labor Costs - Purchased Services
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year**	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
	Reporting Activities											
80.1449	RFS0901 - Quarterly Production Outlook Report - form amended to clarify biointermediates, but effort unchanged and number of responses unchanged (accounted for in 2060-0725)	0.00	0.00	0.00	0.00	40.00	0.00	0.00	0.00	0.00	RFS0902	0.00
80.1450(b) and 40 CFR 1090.805	Registration: Initial registration or update for renewable fuels producers - company and facility information	2.00	0.00	0.00	164.00	40.00	1.00	40.00	80.00	6560.00	TeRRA (OTAQREG)	0.00
80.1450(b)	Registration: Initial registration or update to detailed description of renewable fuels processes using biointermediates from registrant - 12 hours total / 3 years to annualize	4.00	0.00	0.00	328.00	40.00	1.00	40.00	160.00	13120.00	TeRRA (OTAQREG)	0.00
80.1450(b)	Registration: Initial registration or update for renewable fuels producers using biointermediates - engineering review - 52 hours total / 3 years to annualize	0.00	0.00	14.00	2296.00	40.00	1.00	40.00	560.00	91840.00	TeRRA (OTAQREG)	91840.00
80.1450(d)	Registration: Update to existing registrations (should be uncommon since these are new registrants, in case of error, change of address)	1.00	0.00	0.00	82.00	2.00	1.00	2.00	2.00	164.00	TeRRA (OTAQREG)	0.00
80.1450(b) and 80 CFR 1090.805	Registration: Set up account in CDX - new registrants only	1.00	0.00	0.00	82.00	20.00	1.00	20.00	20.00	1640.00	TeRRA (OTAQREG)	0.00
80.1450 and 80 CFR 1090.805	Registration: Updates to existing and new registrations to associate with third party auditor	0.50	0.00	0.00	41.00	40.00	1.00	40.00	20.00	1640.00	TeRRA (OTAQREG)	0.00
80.1450 and 80 CFR 1090.805	Registration: Updates to existing and new registrations to associate with QAP provider	0.50	0.00	0.00	41.00	40.00	1.00	40.00	20.00	1640.00	TeRRA (OTAQREG)	0.00
§80.1451(b)	Reporting: Quarterly RFS Activity Report (4x/yr.) - burden for new respondents	1.00	0.00	0.00	82.00	20.00	4.00	80.00	80.00	6560.00	RFS0105: RFS ACTIVITY REPORT/URF - approved under 2060-0723	0.00
§80.1451(b)	Reporting: Quarterly RFS Renewable Fuel Producer Supplemental Report (4x/year, as needed); producers only - burden for new respondents	0.50	0.00	0.00	41.00	20.00	4.00	80.00	40.00	3280.00	RFS0601: RFS RENEWABLE FUEL PRODUCER SUPPLEMENTAL REPORT/URF - approved under 2060-0725	0.00
§80.1451(b)	Reporting: Quarterly Co-Products Report (4x/year) - burden for new respondents	0.50	0.00	0.00	41.00	20.00	4.00	80.00	40.00	3280.00	RFS0702	0.00
§80.1451(b)	Reporting: Quarterly Renewable Biomass Report (4x/year) - burden for new respondents	0.50	0.00	0.00	41.00	20.00	4.00	80.00	40.00	3280.00	RFS0802	0.00
80.1452	Reporting: EMTS transactions for 20 new respondents	2.00	0.00	0.00	164.00	40.00	1.00	40.00	80.00	6560.00	TeRRA (EMTS) - approved under 2060-0725	0.00

80.1453	Reporting: Generated product transfer documents related to biointermediates (a)(11)(v)	2.00	0.00	0.00	164.00	40.00	1.00	40.00	80.00	6560.00	CBP	0.00
80.1464	Attest Engagements for renewable fuel producers who use biointermediates	0.10	0.00	24.00	3944.20	40.00	1.00	40.00	964.00	157768.00	ATT0100	157768.00
80.1469	Participation in QAP program for renewable fuel producers using biointermediate feedstocks - all purchased services	0.00	0.00	120.00	19680.00	40.00	1.00	40.00	4800.00	787200.00	QAP forms 2000, 2200, 2300, 2400 - refer to Table IV as well - these are submitted by QAP providers on behalf of these respondents	787200.00
	Recordkeeping Activities											
80.1453	Initial programming of new PTD statements	4.00	0.00	0.00	328.00	40.00	1.00	40.00	160.00	13120.00	CBP	0.00
80.1453	Retention of biointermediate PTDs**	0.00	0.25	0.00	11.00	40.00	260.00	10400.00	2600.00	114400.00	CBP	0.00
80.1453	Retention of general PTDs (20 new respondents)	0.00	0.25	0.00	11.00	20.00	260.00	5200.00	1300.00	57200.00	CBP	0.00
80.1454	General recordkeeping related to RF production and transfers (20 new respondents)**	0.00	0.10	0.00	4.40	20.00	260.00	5200.00	520.00	22880.00	CBP	0.00
GRAND TOTAL						622.00		21,542.00	11,566.00	1,298,692.00		1,036,808.00

* Assumes 40 RIN Generators, who are renewable fuels producers. Of these 20, are assumed to be new registrants.

** Assumes 260 business days for daily R&R activities.

Annual Respondent Burden and Cost by Type of Party												
Table III - Recordkeeping by Biointermediate Importers*												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	\$ Non-Labor Costs - Purchased Services
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year**	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
	Reporting Activity											
None.	None for these respondents.											
	Recordkeeping Activity											
80.1453	Retain product transfer documents from biointermediate producer	0.00	0.25	0.00	11.00	5.00	260.00	1300.00	325.00	14300.00	CBP	0.00
80.1478	Acquire independent volume certification, retain and give to RF producer and biointermediate producer - assume two instances per month, all purchased service	0.00	0.00	24.00	3936.00	5.00	12.00	60.00	1440.00	236160.00	CBP	236160.00
GRAND TOTAL						10.00		1360.00	1765.00	250460.00		236160.00

Notes to the Table:

* Assumes 15 existing importers who will import biointermediates.

** Assumes X instances for Y R&R.

Annual Respondent Burden and Cost b

Table 4 - 20 Auditors, 10 Third Party Engineers and Two (2) QAF

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>
	<i>Reporting Activities</i>				
80.1450 and subpart I of 40 CFR part 1090	Overhead, basic information - new registrants - assumes most already registered; cost of registration is borne by primary party as part of the purchase of services - all third parties - cost and hours attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
80.1450 and subpart I of 40 CFR part 1090	Set up account in CDX, EMTS - new registrants only, assumes 10% of total new	0.00	0.00	0.00	0.00
80.1450(b) and 40 CFR 1090.805	Registration: Initial registration of new biointermediate producers - engineering review - submitted on behalf of respondents on Tables I and II - costs and hours attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
80.1464 and Subpart S of 40 CFR part 1090	Reporting: perform and submit attest engagement on behalf of clients - submitted on behalf of respondents on Tables I and II - costs and hours are attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
	Reporting: perform QAP function on behalf of clients - submitted on behalf of respondents on Tables I and II - costs and hours are attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
	<i>Recordkeeping Activities</i>				
80.1454	Retain records related to registration and engineering review - costs and hours are attributed to parties on Tables I & II	0.00	0.00	0.00	0.00

80.1464	Retain records related to attest engagement - costs and hours are attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
80.1469	Retain records related to QAP - costs and hours are attributed to parties on Tables I & II	0.00	0.00	0.00	0.00
80.1478	Independent third parties who do volume certification for biointermediate importer - costs and hours attributed to parties on Table III	0.00	0.00	0.00	0.00
GRAND TOTAL					

Notes to the Table:

The cost, hours, and submissions associated with third party registrants and attest engagements fully passed or This table adds up the number of third parties to count respondents, but the hours and \$ are already counted or

by Type of Party						
Providers, for a total of 32 Third Parties						
Total Hours and Cost					Forms & Notes	\$ Non-Labor Only Portion of Column K - All Purchased Services for this Table
Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
32.00	0.00	0.00	0.00	0.00	OTAQREG INSTRUCTIONS	0.00
3.00	0.00	0.00	0.00	0.00	OTAQREG INSTRUCTIONS	0.00
10.00	0.00	0.00	0.00	0.00	TeRRA (OTAQREG)	0.00
20.00	0.00	0.00	0.00	0.00	ATT0100 and "free form report" (CBP)	0.00
2.00	0.00	0.00	0.00	0.00	QAP forms RFS 2000, 2200, 2300, 2400	0.00
32.00	0.00	0.00	0.00	0.00	CBP	0.00

20.00	0.00	0.00	0.00	0.00	CBP	0.00
2.00	0.00	0.00	0.00	0.00	CBP	0.00
2.00	0.00	0.00	0.00	0.00	CBP	0.00
123		0	0	0		0.00

1 to the parties in Tables I-III as purchased services.

1 the parties in Tables I-III using these purchased services.

Labor Costs				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour^a</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
Total Employer Cost/hour				82
Purchased Services^b				164

^a Overhead is calculated to be equal to the cost of labor.

^b 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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