

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (Renewal), EPA ICR Number 1797.09, OMB Control Number 2060-0442.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) were proposed on June 11, 1973, and promulgated on March 8, 1974. These regulations apply to existing facilities for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978, that store petroleum liquids in storage vessels with a storage capacity greater than 151,416 liters (40,000 gallons), including: storage vessels with capacity greater than 151,416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons). This information is being collected to assure compliance with 40 CFR Part 60, Subpart K.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or in 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 of these measurements and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The 'burden' to the "Affected Public" may be found below in Table 1: Annual

Respondent Burden and Cost – NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 1978 (40 CFR Part 60, Subpart K) (Renewal). The ‘burden’ to the Federal Government 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 Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (Renewal). There are approximately 281 facilities subject to the NSPS, Subpart K. None of the 281 facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are 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, approximately 281 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This ICR updates the number of facilities from the currently-approved ICR based on data from EPA's Enforcement Compliance History Online (ECHO) database, which tracks a total of 281 refineries, terminals, and other facilities that report information under 40 CFR Part 60, Subpart K. This estimate is a more-recent estimate of affected sources and reflects the Agency's best knowledge of actual subject entities based on data reported to EPA.

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 facilities with storage vessels sources 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 K.

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 in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 these standards are used to inform either 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.

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

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

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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* (86 FR 8634) on February 8, 2021. 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. This ICR updates the number of facilities from the currently-approved ICR based on data from EPA's ECHO database and reflects the Agency's best knowledge of actual subject entities based on data reported to EPA. Approximately 281 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Petroleum Institute, at 202-682-8000, and the American Fuel and Petrochemical Manufacturers, at 202-457-0480.

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 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 that 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 facilities that have petroleum liquid storage vessels meeting the rule criteria. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for such facilities can be found in the following table:

Standard (40 CFR Part 60, Subpart K)	SIC Codes	NAICS Codes
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

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (40 CFR Part 60, Subpart K).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction.	§60.7(a)(1)
Notification of actual date of initial startup	§60.7(a)(3)
Notification of physical or operational change.	§60.7(a)(4)

A source must keep the following records:

Recordkeeping	
Records are required to be retained for two years.	§60.7(f)
Owner/operator shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.	§60.113(a)
Maintain records of the occurrence and duration of any startup, shutdown, or malfunction.	§60.7(b)

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.
Install, calibrate, maintain, and operate a floating roof or vapor recovery system.
Perform initial performance test 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 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 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 notifications 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 these regulations. 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 Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (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 1,310 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(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 standard(s) 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 the regulations are labor costs. Again, 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 \$323.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (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, approximately 281 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 281 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	2.81	278.19	0	281
2	0	2.81	278.19	0	281
3	0	2.81	278.19	0	281
Average	0	2.81	278.19	0	281

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 281.

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
Notification of physical or operational change	2.81	1	278.19	281
			Total	281

The number of Total Annual Responses is 281.

The total annual labor costs are \$154,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (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 1,310 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (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 5 hours per response.

There are no total annual capital/startup and O&M costs to the regulated entity. 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 6 labor hours at a cost of \$323; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (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

The increase in burden from the most-recently approved ICR is due to an adjustment. The previously-approved ICRs (1797.08, 1797.07) relied on information from the 2011 Petroleum Refinery ICR for estimates of facilities with storage tanks subject to 40 CFR Part 60, Subpart K, which was the best source of information at that time. However, this ICR updates the number of facilities based on data from EPA's ECHO database, which tracks a total of 281 refineries, terminals, and other facilities that report information under 40 CFR Part 60, Subpart K. This estimate is a more recent estimate of affected sources and is similar to the estimates conducted in

prior ICRs (e.g., 1797.06) and reflects the Agency's best knowledge of actual subject entities. However, we expect this number may be lower as facilities that modify tanks initially subject to subpart K would become subject to other regulations, e.g., 40 CFR Part 60, Subpart Kb. There is no change in capital/startup and O&M costs compared to the prior ICR renewal.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 5 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, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2020-0647. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2020-0647 and OMB Control Number 2060-0442 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 Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (Renewal)

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical 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	1	1	1	281	281	14.05	28.1	\$38,224.01
B. Required activities:	See 3D							
i. Monitoring of operations and emissions ^d	See 3D							
C. Gather existing information	See 3D and 4E							
D. Write notification								
i. Notification of reconstruction/modification	N/A							
ii. Notification of physical or operational change ^e	4	1	4	2.81	11.24	0.562	1.124	\$1,528.96
Subtotal for Reporting Requirements					336			\$39,753
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements ^c	See 3A							
B. Plan activities	See 3E							

C. Implement activities	See 3E							
D. Develop record system	N/A							
E. Time to enter and transmit information:								
i. Records of startup, shutdown, or malfunction	1	1	1	281	281	14.05	28.1	\$38,224.01
ii. Record petroleum liquid stored	0.5	1	0.5	281	140.5	7.025	14.05	\$19,112.00
iii. Record of storage performance tests	0.5	1	0.5	281	140.5	7.025	14.05	\$19,112.00
iv. Record true vapor pressure of liquid stored	1	1	1	281	281	14.05	28.1	\$38,224.01
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						969		\$114,672
TOTAL ANNUAL BURDEN AND COST (rounded) ^f						1,310		\$154,000
TOTAL CAPITAL AND O&M COST (rounded) ^f								\$0
GRAND TOTAL (rounded) ^f								\$154,000

Assumptions:

^a We assume there are approximately 281 sources currently subject to the standard, and that there will be no new sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$122.20 for technical, \$153.55 for managerial, and \$61.51 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c This ICR assumes all respondents will take 1 hour to familiarize with regulatory requirements.

^d Monitoring and recordkeeping operations include maintaining records of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period, unless the affected facility is equipped with a vapor recovery and return or disposal system in accordance with the requirements in 40 CFR 60.112, or stores liquid with a Reid vapor pressure of less than 6.9 kPa (1.0 psia), provided the true vapor pressure does not exceed that value.

^e We assume only one percent of respondents (i.e., 0.01 of 281, or 2.81 respondents) will make physical or operational changes to their tanks in such way that will trigger reporting requirements under the standard.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR Part 60, Subpart K) (Renewal)

Burden Item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person- hours per respondent per year (C=AxB)	(D) Respondent s per year ^a	(E) Technica l person hours per year (E=CxD)	(F) Managemen t hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Total Cost per year (\$) ^b
Notification of reconstruction/modification	N/A							
Notification of physical or operational change ^c	2	1	2	2.81	5.62	0.281	0.562	\$322.90
TOTAL ANNUAL BURDEN AND COST (rounded) ^d						6		\$323

Assumptions:

^a We assume there are approximately 281 sources currently subject to the standard, and that there will be no new sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$51.23 for technical, \$69.04 for managerial, and \$27.73 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2021 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 We assume only one percent of respondents (i.e., 0.01 of 281, or 2.81 respondents) will make physical or operational changes to their tanks in such way that will trigger reporting requirements under the standard.

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