SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER [2650.01]
"GATHERING DATA ON RESULTS OF NEWLY REQUIRED ANNUAL AND TRIENNIAL TESTING TO EVALUATE THE IMPACTS OF U.S. EPA'S 2015 FEDERAL UNDERGROUND STORAGE TANK REGULATION"

2021

ICR SUPPORTING STATEMENT
Part A

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Section 1. Identification of the Information Collection

1(a) Title and Number of the Information Collection

Information Request for: "Gathering Data on Results of Newly Required Annual and Triennial Testing to Evaluate the Impacts of U.S. E.P.A.'s 2015 Federal Underground Storage Tank Regulation," EPA ICR Number 2650.01.

1(b) Abstract

This information collection request will allow U.S. E.P.A. to employ a contractor to compile data from private companies providing compliance testing[1] to owners of federally regulated underground storage tank systems (USTs). The completed dataset of test results will allow EPA to evaluate the effectiveness of several of the newly required measures to prevent fuel releases included in the 2015 federal UST regulation: spill containment liquid tightness testing, containment sump liquid tightness testing (for containment sumps used for interstitial monitoring of piping of single-wall construction), overfill equipment inspections, and two types of annual leak detection equipment testing. EPA is interested in quantitatively assessing if passing rates improve between initial and subsequent rounds of testing in the 15 states from which data will be collected. EPA will use the data to identify if, and by how much, testing required by the regulation impacts equipment performance over time. EPA will use this information to enhance national UST program performance.

The data gathered will be pass/fail results from four categories of newly required testing measures, taken from contractors performing the testing across facilities in the 15 states whose required updated state regulations went into effect soonest after the 2015 federal UST regulation was published. The contractor will collect and assimilate testing data from a census of the 119 UST servicing companies who typically perform the regulatory testing and other inspection requirements for UST owners and operators in these 15 states. The contractor's deliverable will be a database of the performance results for newly required UST testing procedures in various states across the country over a period of approximately six years. The facilities in these states were all required by their respective state regulations to achieve a passing test result for each category of testing prior to December 31, 2018[2], (or approximately three years after the 2015 federal regulation passed). They were then to achieve another passing test result for each category three years after the initial deadline, according to their state regulations (none later than December 31, 2021); we are referring to this as the second round of triennial required testing. Annually required leak detection equipment testing was first required no later than December 31, 2018, and annually by that date thereafter. Data will be compiled from UST servicing companies from tests performed from 2015 until the initial testing deadline, and from test results for

[1] Overfill inspections are technically not referred to as "tests" because the only way to *test* the overfill equipment when installed in an UST system could result in an actual release of fuel if the equipment failed the test. So the federal UST regulation requires overfill equipment be *inspected* and found meet several criteria (moving parts function properly, equipment is in proper position, no other impediments to working properly) to be in compliance. The use of the term "test" throughout this document will refer to equipment that is tested, as well as overfill equipment that it is inspected.

[2] The federal regulation became effective October 13, 2015. The 15 earliest states set their own deadlines for the first and subsequent rounds of testing, but generally all had initial deadlines between October 2018 and December 31, 2018.

regulatory compliance for the second test required either within one year or three years after the initial test (depending on the test requirements).

The possible outcomes of the data collection and analysis may range across four general results:

1. No significant improvement – no statistically significant difference in passing rates between baseline and subsequent tests.
2. Mixed results, with some types of tests in some states showing improvement and others showing no improvement or decline.
3. Statistically significant improvements in passing rates across all three tests across the 15 states surveyed after baseline testing.
4. Statistically significant decline in passing rates across all three tests across the 15 states surveyed after baseline testing.

EPA will use the information collected with the authority of this ICR to learn about the effectiveness of UST testing requirements, which could influence future EPA regulations, policy, guidance, and UST facility practices. EPA will share the information gathered from this collection with all state implementing agencies, who could use the results to better inform their future regulations, policies, and guidance for preventing UST releases. Many of these states have different environmental challenges that impact UST operations and legislative flexibility or requirements in how they implement their UST programs. States responsible for implementing the federal regulation must do so at least as stringently as the federal regulation, but many have requirements more stringent than the federal regulation, or have requirements beginning at a later date than other states. Sharing this information will help states implement their programs better, which will help EPA execute national UST program goals and better protect human health and the environment.

Section 2. Need for and Use of the Collection

2(a) Authority for the Collection

EPA's Underground Storage Tanks program regulates facilities under 40 CFR 280 and 281 under the authority of sections 2002, 9001, 9002, 9003, 9004, 9005, 9006, 9007, 9010, and 9012 of the Solid Waste Disposal Act (SWDA) of 1965, as amended (commonly known as the Resource Conservation and Recovery Act (RCRA)) [42 U.S.C. 6912, 6991, 6991(a), 6991(b), 6991(c), 6991(d), 6991(e), 6991(f), 6991(i), and 6991(k)].

2(b) Need for the Collection

EPA updated the federal underground storage tank regulation in 40 CFR 280 and 281 in 2015 for the first time since initially promulgating the rule in 1988. The update imposed several new operation and maintenance requirements for owners and operators of underground storage tank systems. These requirements were developed to better prevent releases from UST systems, based on technological changes to fuels, equipment, and other industry changes. They were developed with input from EPA and the regulated community based on decades of operational experience.

Some of the updated requirements included new testing for UST release prevention equipment. The regulation required owners and operators to begin testing their equipment regularly and present evidence of a passing test result in the preceding three years for:

- Spill containment liquid tightness testing
- Containment sump liquid tightness testing (for containment sumps used for interstitial monitoring of piping of single-wall construction)
- Overfill equipment inspections

Regulations also included modifications to annual leak detection equipment testing requirements:

- Line leak detectors
- Interstitial sensors

Other requirements in the 2015 UST regulation are specific to unique situations such as USTs specially designed for airports and are not widely applicable to most of the UST universe, or have requirements that are not applicable to measurement through data collection.

EPA has chosen to collect data on these four categories of equipment testing requirements which are both widely applicable to most UST systems, and have pass requirements that are quantifiable. We believe collecting the information only from these requirements from the 2015 UST regulation has the highest chance of being both practical to collect and operational for the UST program to make improvements once data is in hand.

This ICR is needed for EPA to collect information on passing rates for new requirements to help EPA understand the effectiveness and impact of the new regulation. Owners and operators are required by regulation to report at least one passing test result by the initial deadline and then again either three years or one year later, respectively. If equipment fails a required test, owners and operators must repeat tests until a passing result is achieved in order to be in compliance. In this study, passing rate is calculated by dividing the number of passing tests by the total number of tests performed. Owners are not required to report the number of failing equipment tests or

total tests required to achieve a passing result, so EPA is not able to assess how often installed UST release prevention equipment fails without this information collection.

This one-time information collection will allow EPA to collect data to better understand how owners and operators are meeting compliance requirements. The data collected will help EPA, and the states where regulated facilities are located, identify areas of deficiency in maintaining intended performance standards for UST systems that cannot be identified through the regulatory reporting and documentation requirements.

2(c) Practical Utility and Users of the Data

EPA will use the information collected with the authority of this ICR to learn about the effectiveness of UST testing requirements, which could influence future EPA regulations, policy, guidance, and UST facility practices. This will help EPA execute national UST program goals and better protect human health and the environment.

Additionally, EPA relies on state agencies to implement the national UST program. Most states have state program approval, where state regulations legally act as the federal regulation. EPA will share the information gathered from this collection with all state implementing agencies, who could use the results to better inform their future regulations, policies, and guidance for preventing UST releases. This information collection targets 15 states that have earliest compliance testing deadlines (prior to December 31, 2018). The results could be useful to these 15 early adopters in a retrospective capacity, enabling state agencies to better understand recent historical trends in compliance and how they may adjust program operations. The remaining states with later testing deadlines may use the information in a predictive capacity to anticipate future compliance testing outcomes in their states and better target resources to improve results.

Finally, UST owners and operators could use the results to modify their existing UST operations and management practices, to better prevent future UST releases and avoid the associated environmental and financial costs required to clean up a release.

Section 3. Non-Duplication, Consultations, and Other Collection Criteria

3(a) Non-Duplication

All information requested from respondents under this ICR is not available from other sources. This collection will be the first opportunity for the government to collect such data because the requirements for testing are being implemented for the first time. EPA has not consulted other databases or directories because we know the specific information we are collecting relates only to these new requirements. Respondents may have collected similar information in the past for other business reasons, but we specifically are looking for newly collected data driven by the new EPA regulation, so past collected information is irrelevant to this effort.

In addition to being newly developed information, it is new information that is not or will not be required to be reported to EPA or UST implementing agencies, so other agencies will not have this information.

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

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register on November 5, 2020 (85 FR 70612) and provided a 60-day comment period. No significantly relevant comments were received.

3(c) Consultations

EPA consulted with the following national and regional companies during the period leading up to a formal public notice and request for comments to estimate burdens for our public comment request:

Table 1: UST Testing Companies Consulted

UST Servicing Company	**Name**	**Phone Number**
Tanknology	Brian Derge	800-964-1250
Crompco	Ed Kubinsky	800-646-3161
Protanic	Dawn Brooks	800-352-2011
Northwest Tank & Environmental	Bob Wiese	425-742-9622
US Tank Alliance	Kathy Pasternak	614-923-0154
7G	Jason Wiles	888-400-3511
Valley Tank Testing	antonella@valleytank.com	813-671-9065
MVI	Marie Broussard	615-320-7317

EPA then requested much broader public comment prior to the ICR submission to OMB in compliance with the 1995 PRA to determine if these burden estimates were realistic.

3(d) Effects of Less Frequent Collection

EPA or public will not be able to gain the benefit of the knowledge derived as a result of this effort without this data collection process. Regular requirements require evidence only of passing

annual and triennial tests. This does not allow EPA to know how often those tests are failed prior to repairs being performed and retests performed to obtain passing results.

3(e) General Guidelines

This collection follows OMB's general guidelines for information collections.

Requirement: Justify any provision under which respondents would:

Retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

Justification: EPA will direct the contractor to ask the UST servicing companies to provide testing data for both periods of testing, the first of which began on October 13, 2015. Given that some of the tests EPA is collecting data on are performed triennially, some data will necessarily have to have been retained for over three years for this collection, but often already is.

3(f) Confidentiality

EPA will collect information aggregated at the state level from each company participating in the collection. EPA will direct the contractor to aggregate the data collected at the state level to avoid disclosing, reporting, and including any identifiable information about the facilities, owners, or operators of the UST systems where the tests were performed. Only facility owners or managers and the petroleum equipment servicing companies performing the work for those companies have the ability to link specific results to specific units, facilities, or owners, which is a normal part of their business practices. EPA's contract terms for the contract awardee require they collect only generalized data from servicing companies, and not from site owners themselves. This prevents any accidental disclosure of site-specific test results or identifying information between the servicing company and the EPA.

3(g) Sensitive Questions

Neither the EPA nor the contractor performing the data collection will ask sensitive or private questions.

Section 4. The Respondents and the Information Requested

4(a) Respondents and NAICS Codes

Table 2 lists the North American Industry Classification System (NAICS) sectors associated with industries most likely affected by the information collection requirements covered in this information collection: UST testing and compliance companies, and UST facility owners and operators.

Other sectors anticipated to be affected by the information collection requirements not shown in Table 2 include local, state, and federal governments. This ICR does not include the burden on UST facilities owned by the federal government, in keeping with the Paperwork Reduction Act.

Table 2: NAICS Sectors of Affected Industries

NAICS Sector	NAICS Sector Description
213112	Support Activities for Oil and Gas Operations
4471	Gasoline Stations
561990	All Other Support Services

4(b) Information Requested

The data collected for the deliverable will be gathered from data collected by servicing companies on services performed. Owners and operators of gas stations are responsible for providing evidence of passing compliance testing results. Servicing companies typically retain records from both passing and failing tests performed as part of their normal business operations, although they are not required to report results to UST implementing agencies. EPA performed research in 2020 that found that of each of the companies they surveyed about record-keeping, all companies kept this data even if they varied the format or retention period for doing so. These companies provide a significant potential source of information for this study, and EPA anticipates the contractor will work with a large number of companies on a voluntarily basis to gather this data. The deliverable requires the EPA contractor work with the UST servicing companies to search this existing stored testing data by various parameters.

EPA will collect data from 15 states:

1. Maine
2. New Jersey
3. West Virginia
4. Florida
5. North Carolina
6. Illinois
7. Michigan
8. Ohio
9. Arkansas
10. Oklahoma
11. Utah
12. Wyoming
13. California

14. Nevada
15. Alaska

The data collected will be delivered in the form of testing results aggregated from all tests and all passing tests conducted by the UST compliance testing companies operating within 15 states, reported at the state level. These testing results will help EPA determine the impact of the 2015 UST regulation.

(i) Data items

All data items are reporting items.

Averaged data

- Triennial requirements: The total number of passing tests and the total number of tests performed for each spill containment liquid tightness test, sump liquid tightness test, and overfill equipment inspection driven by triennial testing requirements. Tests reported are those performed by each participating company in all the states in which it performed such tests and reported in aggregated form at the state level, for each period: initial testing between October 13, 2015 and December 31, 2018, and second round testing between January 1, 2019 and December 31, 2021.
    - Note: Owners and operators regulated under 40 CFR 280.35 must have evidence of passing test results for spill containment liquid tightness testing, containment sump liquid tightness testing (for containment sumps used for interstitial monitoring of piping if of single-wall construction), and overfill equipment inspections conducted within the last three years.
- Annual requirements: The total number of passing tests and total number of tests performed for all line leak detector and interstitial sensor tests. Tests reported are those performed by each participating company in all the states in which it performed such tests and reported in aggregated form at the state level, for each year: 2016-2021.

(ii) Respondent activities

This information collection involves two groups of respondents: UST testing companies, who collect and maintain the data sought by EPA, and UST owners and operators, who represent the data items sought. For this information collection request, each UST testing company surveyed by the EPA research contractor will conduct the following only once over the information collection period (this is not a repeat data collection).

UST Testing Companies:

1. Consult with EPA research contractor on a voluntary agreement regarding the voluntary submission of aggregated data from their data storage tool and the process by which to submit this data, including format, timeline, and protocol for protecting identifying information.
2. Extract the data from their data storage tool by running the appropriate queries.

3. Review the data to ensure they have removed any identifying information and prepare it for submission to the EPA research contractor.
4. When complete, submit the data to the research contractor and maintain data records internally for at least three years.
5. Keep electronic records of passing and failing test results provided in this collection for three years from the date of collection for information provided, including for initial testing and second round testing for each spill containment liquid tightness test, sump liquid tightness test, and overfill equipment inspection driven by triennial testing requirements and leak detection equipment testing and inspection results from annual requirements.

Gas station owners and operators:

- There are no additional activities required for UST owners and operators for this information collection beyond those regulatory requirements to have evidence of passing test results; therefore, this group faces no additional burden for this information collection under the 1995 PRA definition of "burden" and burden described in OMB 5 CFR §1320.3(b)(1).

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

5(a) Agency Activities

Agency activities associated with this information collection consist of the following:

1. Manage the contract under which the research contractor to the agency will gather the requested information from private companies, including providing direction and guidance to the contractor during the data collection period.
2. Analyze the data presented in the requested database and any other deliverables.
    a. EPA may share the database and the agency's interpretation of the results of the collection through written or verbal channels.

EPA will employ a research contractor to perform the work needed to collect and organize the data sought. Contractor activities will consist of the following:

1. Consult with EPA regarding expectations for the data sought, research methodology, and the format of the database deliverable.
2. Participate in ongoing communications with EPA regarding the research progress.
3. Contact selected UST testing companies within a group of 15 states to request the testing data sought.
4. Compile cleaned and anonymized data into a database deliverable for EPA. Provide a summary guide for using the deliverable and the research process used to compile the data, including written records of communications with UST testing companies, where applicable.

5(b) Collection Methodology and Management

EPA will task the contractor with collecting testing data from participating companies. All data will be provided voluntarily by the companies and will be in the form of aggregated testing data. The contractor will be tasked to contact 119 UST testing companies via email, using a template provided by EPA. The contractor will be tasked to follow up with companies that have not responded to the email via a follow-up email. The contractor will attempt to contact any companies that have not responded to two emails via phone. The companies will be asked to submit data electronically using a standardized reporting form that the contractor will build. The companies will also have the option of electronically submitting raw data for the contractor to compile in the appropriate form.

The data will be delivered in a database to EPA, which can be accessed through any public records request. All information will be collected by the contractor from servicing companies in a digital format, and EPA will receive a clean database as the deliverable in a database format. No machine or processing technology will be used other than a computer and database programs. Electronic collection and processing is the most efficient use of time for all parties involved.

5(c) Small Entity Flexibility

EPA will not offer different information collection flexibilities under this project because all participation is voluntary. All businesses involved are likely collecting this information as part of normal business practices. Additional work to respond is IT work related to data management and review.

5(d) Collection Schedule

EPA will direct the research contractor to collect this information in early 2022. EPA anticipates a collection timeline of 180 days, after which the research contractor will submit the database of collected information to the agency for review.

Section 6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

To estimate burden hours and rates, EPA conducted informal interviews with 8 UST testing companies (see Table 1). Note that while UST owners and operators are considered to be respondents in this information collection, they were not included in the burden calculations because the information will be sought only from UST testing companies and is collected as part of routine business operations.

Table 1: UST Testing Companies Consulted

UST Servicing Company	**Name**	**Phone Number**
Tanknology	Brian Derge	800-964-1250
Crompco	Ed Kubinsky	800-646-3161
Protanic	Dawn Brooks	800-352-2011
Northwest Tank & Environmental	Bob Wiese	425-742-9622
US Tank Alliance	Kathy Pasternak	614-923-0154
7G	Jason Wiles	888-400-3511
Valley Tank Testing	antonella@valleytank.com	813-671-9065
MVI	Marie Broussard	615-320-7317

Email correspondence with the 8 companies surveyed can be found in Exhibit 4. Based on their feedback, the information collection would require three separate activities: (1) consultation with the EPA research contractor, (2) data mining from a database or other data management tool, and (3) data manipulation, as appropriate, and submission to the research contractor. Based on conversations with testing companies, EPA estimates 8 hours at the managerial level for activity (1); 8.75 hours at the managerial level for activity (2); and 4.5 hours at the technical level for activity (3).

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

To estimate hourly rates, EPA used information collected during informal interviews to estimate an average hourly rate (labor plus overhead) of $139.25/hour for managerial staff conducting activities (1) and (2), and an average hourly rate of $75/hour for technical staff conducting activity (3). These hourly rate estimates were taken by averaging the wage rate given by companies surveyed for completing each respective activity. EPA found these estimates to be high in comparison with Labor Department estimates; however, since these rates reflect the estimates of industry experts, EPA believes them to be a reliable representation of the opportunity cost of labor and the compensation rates of professionals in this field.

Based on conversations with UST testing companies, no legal or clerical staff are expected to be involved in this information collection and are therefore not included in the burden estimate table.

Based on EPA's estimates of average burden hours per respondent, EPA estimates a labor cost of $2,669.94 per respondent. Since this is a one-time information collection activity, this represents the total cost to the respondent over the three-year information collection period.

EPA will collect information from a census of 119 companies operating in the 15 states examined in this information collection. EPA estimates a participation rate of 50% based on three elements: the results of previous EPA censuses; prior EPA engagements with the underground storage tanks industry on other research or outreach efforts; and EPA's survey of 9 companies in 2020 related to the effort in this data collection. Based on this estimated response rate, this burden estimate was calculated assuming 60 total companies participate.

The table below shows the overall respondent burden and costs. Based on these estimates, EPA estimates the overall private cost and burden over the three-year lifetime of the information collection to be $160,196.25.

Respondent Burden and Cost

	Hours and costs per respondent						Total hours and costs			
Information Collection Activity	Managerial $139.25/hr	Technical $75/hr	Respondent hours	Labor cost	Capital/startup cost	O&M cost	Number of respondents	Total hours	Total cost	Annualized cost
Consultation with EPA research contractor	8	0	8	$1,114	0	0	60	480	$66,840.00	$22,280.00
Pulling data from database	8.75	0	8.75	$1,218.44	0	0	60	525	$73,106.25	$24,368.75
Data manipulation and submission	0	4.5	4.5	$337.50	0	0	60	270	$20,250.00	$6,750.00
Subtotal	**16.75**	**4.5**	**21.25**	**$2,669.94**	**0**	**0**	**60**	**1,275**	**$160,196.25**	**$53,398.75**

(ii) Estimating Capital and Operations and Maintenance Costs

Respondents incur no additional capital costs through this Information Collection Request. Operations and management costs are accounted for within the respondent burden hours estimates and are therefore omitted here to avoid double-counting.

(iii) Capital/Start-up Operating and Maintenance (O&M) Costs

EPA determined that there are no capital/start-up costs associated with this information collection request. UST testing companies surveyed already possess the technology, equipment, and training necessary to respond to the data collection as part of their routine operations. Operation and maintenance costs are accounted for within responded burden calculations as the information collection activities required under activity (3), submission of data to the research contractor. O&M costs are therefore not repeated to avoid double-counting labor hours.

(iv) Annualizing Capital Costs

Annualized capital costs cannot be included because no capital costs are anticipated.

6(c) Estimating Agency Burden and Cost

EPA estimates an average hourly labor cost of $110 for legal staff (GS-15, Step 1), $79 for managerial staff (GS-13, Step 1), $55 for technical staff (GS-11, Step 1), and $37 for clerical staff (GS-7, Step 1). To derive these hourly estimates, EPA referred the General Schedule Salary Table for 2020, published by the U.S. Office of Personnel Management, for the Washington-Baltimore-Arlington Locality Pay Area. EPA then applied the standard government loading factor of 60 percent, which includes fringe benefits and overhead.

The table below shows the agency burden estimate table, which includes managing the research contract and reviewing deliverables from the research contractor. EPA estimates 8 total hours at the legal level, 18 total hours at the managerial level, and 74 hours at the technical level for this information collection. The total agency burden is estimated to be $1,845.33 annually over a three-year period, and $5,563 over the lifetime of this ICR.

Agency Burden Estimate

	Hours and costs per respondent								Total hours and costs			
Information Collection Activity	Legal $110/hour	Managerial $79/hour	Technical $55/hour	Clerical $37/hour	Respondent hours/year	Labor cost/year	Capital/startup cost	O&M cost	Number of respondents	Total hours	Total cost	Annualized cost
Manage Research Contract	6	12	58	0	76	$4,798	0	0	1	76	$4,798.00	$1,599.33
Review Deliverables	2	6	16	0	24	$765.00	0	0	1	24	$765.00	$255.00
Subtotal	8	18	74	0	100	$5,563.00	0	0	1	100	**$5,563.00**	**$1,854.33**

The table below shows the estimated labor and cost breakdown for the research contractor EPA may employ for this information collection process. EPA derived these cost estimates using hourly rate information available from the most recent contract used by the Office of Underground Storage Tanks. EPA estimates a total cost to the Agency of $96,437.60 to employ a contractor to collect the data sought in this information collection.

Research Contractor Cost Estimate

Labor Category	Average Hourly Rate	General Support	Task 1 (hours) Statement of Work	Task 2 (hours) Review Plan and Propose QAPP	Task 3 (hours) Develop data collection tool	Task 4 (hours) Outreach Package	Task 5 (hours) Recruit Participants	Task 6a (hours) Collect primary study data	Task 6b (hours) Collect secondary study data	Task 7a (hours) Create compiled primary database	Task 7b (hours) Create compiled secondary database	Task 7c (hours) Create accompanying procedural report	Total Labor Hours	Total Labor Cost per Labor Category
Program Manager	$ 182.87		2	6	6	6	20	20	10	5	5	3	83	$ 15,178.21
Project Manager	$ 160.35		4	8	8	8	30	40	20	10	5	6	139	$ 22,288.65
Analyst 2	$ 99.35		6	8	8	16	60	60	60	10	5	10	243	$ 24,142.05
Analyst 1	$ 62.17		12	13	20	32	60	200	100	15	10	15	477	$ 29,655.09
Quality Assurance Specialist	$ 144.30		2	2	2	2	2	2	2	2	2	2	20	$ 2,886.00
Administrative/Clerical	$ 57.19		4	4	4	4	4	4	4	4	4	4	40	$ 2,287.60
Total Labor Hours by Task			30	41	48	68	176	326	196	46	31	40	1002	
Total Labor Cost by Task			1709.22	2560	2981.68	4463.68	12894.7	21911.4	13802.4	2895	1827.8	$2,478.00		**$ 96,437.60**

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

EPA estimates that 119 testing companies within 15 states will be surveyed by a contractor and asked to provide compliance testing results for the time period from 2015 to 2021. EPA conducted preliminary research to identify the 119 UST testing companies operating in the 15 states examined in this information collection.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

This table displays the bottom-line respondent annual cost and burden estimates.

Total Estimated Respondent Burden and Cost Summary	Number of Respondents	Number of Activities	Total Hours Per Year	Total Labor Cost Per Year	Total Annual Capital Costs	Total Annual O&M Costs
UST Testing Companies	60	300	425	$53,398.75	0	0
TOTAL	**60**	300	0	**$53,398.75**	**0**	**0**

(ii) The Agency Tally

This table displays the bottom-line Agency cost estimates for this information collection. Please note that while costs have been annualized, EPA anticipates that all research contractor activities will occur in 2022 rather than over a three-year collection period.

Total Estimated Agency Burden and Cost Summary	Number of Respondents	Number of Activities	Total Hours Per Year	Total Annual Labor Cost
Agency Activities	1	2	33.3	$1,854.33
Research Contractor Activities	1	4	193	$13,748.73
TOTAL	**1**	**6**	**226.3**	**$15,603.06**

(iii) Variations in the Annual Bottom Line

As stated above, EPA annualized costs for this information collection over a three-year period; however, the contractor costs are expected to occur in 2022.

6(f) Reasons for Change in Burden

No changes have been made to this burden estimate.

6(g) Burden Statement

For respondents, defined in this information collection as UST testing companies and UST owners and operators, annual burden and cost is estimated to be $53,398.75/year over a three-year period. Burden and cost over the lifetime of the ICR is estimated to be $160,196.25. For the Agency, annual burden is estimated to be $1,854.33 for Agency staff and $5,563 total over a three-year period. The Agency will also incur an additional $96,437.60 in research contractor costs over the three-year period, with the contractor work expected to occur in 2022 only.

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 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. The OMB control numbers for EPA's regulations are listed in 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-OLEM-2020-0354], which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Underground Storage Tanks Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 “Gathering Data on Results of Newly Required Annual and Triennial Testing to Evaluate the Impacts of U.S. E.P.A.’s 2015 Federal Underground Storage Tank Regulation” is (202) 564-0663. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OLEM-2020-0354 and OMB Control Number 2050-NEW in any correspondence.

Exhibits

Exhibit 1. Respondent Burden and Cost

	Hours and costs per respondent						Total hours and costs			
Information Collection Activity	Managerial $139.25/hr	Technical $75/hr	Respondent hours	Labor cost	Capital/startup cost	O&M cost	Number of respondents	Total hours	Total cost	Annualized cost
Consultation with EPA research contractor	8	0	8	$1,114	0	0	60	480	$66,840.00	$22,280.00
Pulling data from database	8.75	0	8.75	$1,218.44	0	0	60	525	$73,106.25	$24,368.75
Data manipulation and submission	0	4.5	4.5	$337.50	0	0	60	270	$20,250.00	$6,750.00
Subtotal	**16.75**	**4.5**	**21.25**	**$2,669.94**	**0**	**0**	**60**	**1,275**	**$160,196.25**	**$53,398.75**

Exhibit 2. Agency Burden and Cost

	Hours and costs per respondent								Total hours and costs			
Information Collection Activity	Legal $110/hour	Managerial $79/hour	Technical $55/hour	Clerical $37/hour	Respondent hours/year	Labor cost/year	Capital/startup cost	O&M cost	Number of respondents	Total hours	Total cost	Annualized cost
Manage Research Contract	6	12	58	0	76	$4,798	0	0	1	76	$4,798.00	$1,599.33
Review Deliverables	2	6	16	0	24	$765.00	0	0	1	24	$765.00	$255.00
Subtotal	8	18	74	0	100	$5,563.00	0	0	1	100	**$5,563.00**	**$1,854.33**

Exhibit 3. Research Contractor Total Cost Estimate

Labor Category	Average Hourly Rate	General Support	Task 1 (hours) Statement of Work	Task 2 (hours) Review Plan and Propose QAPP	Task 3 (hours) Develop data collection tool	Task 4 (hours) Outreach Package	Task 5 (hours) Recruit Participants	Task 6a (hours) Collect primary study data	Task 6b (hours) Collect secondary study data	Task 7a (hours) Create compiled primary database	Task 7b (hours) Create compiled secondary database	Task 7c (hours) Create accompanying procedural report	Total Labor Hours	Total Labor Cost per Labor Category
Program Manager	$ 182.87		2	6	6	6	20	20	10	5	5	3	83	$ 15,178.21
Project Manager	$ 160.35		4	8	8	8	30	40	20	10	5	6	139	$ 22,288.65
Analyst 2	$ 99.35		6	8	8	16	60	60	60	10	5	10	243	$ 24,142.05
Analyst 1	$ 62.17		12	13	20	32	60	200	100	15	10	15	477	$ 29,655.09
Quality Assurance Specialist	$ 144.30		2	2	2	2	2	2	2	2	2	2	20	$ 2,886.00
Administrative/Clerical	$ 57.19		4	4	4	4	4	4	4	4	4	4	40	$ 2,287.60
Total Labor Hours by Task			30	41	48	68	176	326	196	46	31	40	1002	
Total Labor Cost by Task			1709.22	2560	2981.68	4463.68	12894.7	21911.4	13802.4	2895	1827.8	$2,478.00		**$ 96,437.60**