

ICR SUPPORTING STATEMENT – PART A

Control of Evaporative Emissions from New and In-Use Portable Gasoline Containers (Renewal)

EPA ICR No.: 2213.07

OMB Control No.: 2060-0597.

ABSTRACT

Under regulations promulgated on February 26, 2007 (72 FR 8428; 40 CFR Part 59, Subpart F), manufacturers of new portable gasoline containers (also “portable fuel container” or “PFC”) from 0.25 to 10.0 gallons in capacity are required to obtain certificates of conformity with the Clean Air Act. The rule applies to containers manufactured on or after January 1, 2009 (manufacturers and importers were given until June 30, 2009 and wholesale distributors until December 31, 2009 to dispose of stocks manufactured before January 1, 2009). Certificates are valid from the effective date until the end of the production period, a maximum of five years. This ICR covers the burdens associated with filing applications for certification, required annual compliance reporting, and warranty claims, based on experience during the prior three years of the program on an annual basis. The applications are processed by the Compliance Division (CD), Office of Transportation and Air Quality, EPA. In essence, an application is in support of an emission limitation of 0.3 grams per gallon per day of hydrocarbons for the mandated five-year useful life of the container. Applicants submit test results conducted in accordance with the regulations, maintenance instructions and warranty information given to the purchasers, copies of the labels, and other information listed in section 4(b). Applications are submitted in no fixed format, although EPA did work with the PFC industry informally on application questions and provided non-confidential versions of acceptable received applications (“FOIA applications”) as examples to other potential applicants. Applications are submitted electronically to the EPA’s engine and vehicle compliance information system (EV-CIS).

The previous ICR authorization was based on an estimated eight respondents for 249.65 hours and \$27,902 in costs, including \$14,010 for capital and O&M costs, including the costs of conducting tests, annually

The burdens in this ICR are based on experience administering the program from January 1, 2019, through December 2022. Currently, there are 14 active EPA certificates of conformity issued to nine different companies. All certificates were issued for five years. Annual warranty reports are due July 1 for the previous calendar year. The portable fuel container (PFC) companies have experienced few emission-related warranty claims, so we are estimating only one warranty report annually for this collection period. The main changes from the previous ICR authorization are the following: updating the agency burden estimate, labor costs, and the number of respondents and responses. The current request estimates nine respondents for 240 hours and \$ 29,855.51 in costs, including \$21,613.67 for capital and O&M costs, including the costs of conducting tests, annually.

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Statutory authority for the PFC controls is found in Sections 183(e) and 111 of the Clean Air Act, 42 U.S.C. sections 7511b(e) and 7414. The EPA is required under Section 183(e) of the Clean Air Act (Act) to regulate Volatile Organic Compound (VOC) emissions from the use of consumer and commercial products. Pursuant to Section 183(e)(3), the EPA published a list of consumer and commercial products and a schedule for their regulation on March 23, 1995 (60 FR 15264). Consumer products were included in Group I of the list, and standards were promulgated on September 11, 1998. In the Administrator's judgment, VOC emissions from the use of consumer products contribute to ground-level ozone formation in ozone non-attainment areas. PFCs are a consumer product which has been shown to be deficient in preventing VOCs in the form of fuel vapors from being emitted into the air. The certification program for PFCs was promulgated in 2007 (72 FR 8533; February 26, 2007). The regulations appear in 40 CFR Part 59, Subpart F (40 CFR §§ 59.600 - 59.699).

The information in a manufacturer's application for certification is needed to ensure that the VOC emission standard will be met during the useful life of the container and that certified containers comply with the labeling, warranty, and other requirements of the regulations. Manufacturers may aggregate containers of like design into one emission family. This saves the manufacturer the expense of testing models of similar but not identical design. The regulations also allow subsequent recertification when a certificate has expired ("carry over"), where design and emissions characteristics are virtually unchanged.

The record keeping requirements are likewise in support of a demonstration that the emissions family certified will meet the emissions standard in the regulation. The records specified are to be provided to EPA upon request.

The annual warranty reports are needed to assure that the containers survive normal use and provide EPA important information on the success of its certification program, weaknesses therein, or examples or patterns of noncompliance. Containers showing excessive warranty claims could be candidates for in-use testing by EPA. Although EPA does not have the authority to recall PFCs, the warranty information along with possible in-use testing by EPA could be used as grounds to withhold subsequent certification or to enter into an enforcement action under the Clean Air Act.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

Agency personnel will use the information collected to:

- Determine if a manufacturer's PFCs meet the VOC emission standard when new;
- Issue a certificate of conformity to the manufacturer so that it can market the covered containers;

- Issue carry-over certificates of conformity from a previous production period instead of requiring the manufacturer to perform new tests, but only if the emission data from the previous production period remains the appropriate emission-data unit;
- Determine whether the PFCs are meeting the VOC emission standard in-use; and
- Reject a manufacturer's application if a PFC design is not meeting the VOC emission standard in use or take other appropriate action.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involved the use of automated, electronic, mechanical, or other forms of technological collection techniques or information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Applicants submit their applications for certification in the document module of EPA's EV-CIS. All system users go through an initial registration process that includes submission of basic information and assignment of a manufacturer code. Warranty reports must also be submitted through the EV-CIS document module, with no set format.

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described above.

The information collected includes product and manufacturing specifications, testing documentation, and successful warranty claims. Similar information is collected by the State of California and approximately 13 other states that have adopted the California Portable Gasoline Container regulation¹. However, the California regulation is different from the federal program in the following areas such that the information is unsuitable for information collection required by the federal rule:

- The test fuel and the temperature cycles used in the federal program represent nationwide ambient temperatures and fuels, while those required in the California regulation reflect California fuels and ambient conditions.
- The federal rule requires the reporting of successful warranty claims concerning fuel containers sold as certified under the rule. While the California regulation also requires that the manufacturer issue warranties, it does not require them to report on the outcomes of successful claims against them.

5. MINIMIZING BURDEN ON SMALL ENTITIES

¹ "Certification Procedure for Portable Fuel Containers and Spill-Proof Spouts", California Air Resources Board July 22, 2005

If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

There are several provisions available for small and larger entity flexibility in the regulations. Hardship deadline extensions for compliance with the standard are available where, due to circumstances neither foreseeable nor preventable, compliance would jeopardize the solvency of the company. Exemptions are for up to one year and are renewable. There are also exemptions for containers intended only for export, used for the sole purpose of testing, competition, or for national security. As with other certification programs, small as well as larger manufacturers have recourse to carry over emission data from a previous production year. They may also request to use alternative testing methods or emissions data already collected using other procedures. The PFC program currently collects no certification fees.

6. EFFECTS OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Certificates of conformity are issued for the production period of the models covered in the emissions family, not to exceed five years. All certificates to date have been issued for five years. However, when a gasoline container design is “carried over” or a new design of a container that is substantially similar to a current container, the amount of new information required is substantially reduced. Warranty reports are required by regulation to be submitted annually.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

This ICR adheres to the guidelines for federal data requesters, as provided at 5 CFR 1320.5(d)(2), with the exception that the regulation requires that records concerning the application for certification be maintained for five years (except for routine testing data for one year). The five-year requirement is consistent with the maximum production period and the consequent five-year duration of certificates. The retention is necessary to allow the agency to adequately monitor compliance. Information on successful warranty claims is required for each model by July 1 of the following year. There is no requirement to report unsuccessful claims against container warranties. There is no requirement by EPA for the manufactures to retain that information beyond the extent necessary to report it annually.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the

information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement soliciting public comment on this ICR was published in the Federal Register on November 3, 2023 (88 FR 75589). A copy of the draft ICR was placed in the docket. No comments were received.

8b. CONSULTATIONS

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

These manufacturers and testing laboratories have been consulted in previous renewals for PFCs. For example, Testing Services Group has previously commented on contract costs for testing and application preparation that was particularly helpful.

<u>Organization</u>	<u>Name</u>	<u>Phone Number</u>
Scepter USA.	Sergio Garza	918.544.2140
No Spill, LLC	Michael Major	414-699-5404
Testing Services Group	Brian Campbell	810-358-0565

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. PROVISIONS FOR PROTECTION OF INFORMATION

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Any information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA regulations at 40 CFR 2.201 Part 2, as stated explicitly in the regulations (40 CFR §59.695). Section 2.201 sets forth how to make confidentiality claims and how documents raising confidentiality issues will be handled by the EPA.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This collection does not involve matters of a sensitive nature.

12. ESTIMATE OF RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

12a. Respondents/NAICS Codes

Respondents to this information collection are manufacturers of PFCs. They fall within standard industrial classification (SIC) 3411 and within the North American Industrial Classification System (NAICS) code of 332431 (metal can manufacturing) or SIC 3089, NAICS 326199 (all other plastic product manufacturing).

The following assumptions were used to estimate the respondent universe and total burden and costs for industry to comply with the various requirements of the rule.

- We estimate nine manufactures of gasoline containers for the domestic market. This manufacturer estimation is consistent with the prior ICR renewal.

- We conservatively anticipate 14 applications in the next five years, or about three applications a year.
- We expect the majority of the applications we receive over the next five years to require PFC testing. We, therefore, anticipate a moderate level of testing for each manufacturer over the next five years. This estimate may be reduced in the next ICR if updated information reduces the expected testing we anticipate for PFCs.
- Manufacturers will continue to contract for testing services and most certificate application preparation.

12b. Information Requested

The required data items are specifically enumerated in the regulations (40 CFR §59.623):

- Describe the emission family's specifications and other basic parameters of the emission controls. List each distinguishable configuration in the emission family. Include descriptions and part numbers for all detachable components such as spouts and caps.
- Describe and explain the method of emission control.
- Describe the products you selected for testing and the reasons for selecting them.
- Describe the test equipment and procedures that you used, including any special or alternate test procedures you used (see §59.650).
- List the specifications of the test fuel to show that it falls within the required ranges specified in §59.650.
- Include the maintenance and use instructions and warranty information you will give to the ultimate purchaser of each new PFC (see §59.613).
- Describe your emission control information label (see §59.615).
- State that your product was tested as described in the application (including the test procedures, test parameters, and test fuels) to show you meet the requirements of this subpart.
- Present emission data to show your products meet the applicable emission standards. Where applicable, §§59.626 and 59.627 may allow you to submit an application in certain cases without new emission data.
- Report all test results, including those from invalid tests or from any other tests, whether or not they were conducted according to the test procedures of §§59.650 through 59.653. We may ask you to send other information to confirm that your tests were valid under the requirements of this subpart.
- Unconditionally certify that all the products in the emission family comply with the requirements of this subpart, other referenced parts of the CFR, and the Clean Air Act.
- Include estimates of U.S.-directed production volumes.
- Include the information required by other sections of this subpart.
- Include other relevant information, including any additional information requested by EPA.
- Name an agent for service located in the United States. Service on this agent constitutes service on you or any of your officers or employees for any action by EPA or otherwise by the United States related to the requirements of this subpart.

An additional reporting requirement is listed in 40 CFR §59.628(e):

- p) Send us an annual warranty report summarizing successful warranty claims by emission family under §59.612, including the reason for the claim. You must submit the report by July 1 for the preceding calendar year.

There is also a one-to-one correspondence between the recordkeeping requirements and the requirements listed in the regulations (40 CFR §59.628):

- a) Organize and maintain the following records:
1. A copy of all applications and any other information you send us.
 2. Any of the information we specify in §59.623 that you were not required to include in your application.
 3. A detailed history of each emission-data unit. For each emission-data unit, include all of the following:
 - i. The emission-data unit's construction, including its origin and buildup, steps you took to ensure that it represents production containers, any components you built specially for it, and all the components you include in your application for certification.
 - ii. All your emission tests, including documentation on routine and standard tests, as specified in §§59.650 through 59.653, and the date and purpose of each test.
 - iii. All tests to diagnose emission-control performance, giving the date and time of each and the reasons for the test.
 - iv. Any other relevant events or information.
 4. Production figures for each emission family divided by assembly plant.
 5. If you identify your PFCs by lot number or other identification numbers, keep a record of these numbers for all the containers you produce under each certificate of conformity.
- b) Keep data from routine emission tests (such as test cell temperatures and relative humidity readings) for one year after we issue the associated certificate of conformity. Keep all other information specified in paragraph (a) of this section for five years after we issue your certificate.
- c) Store these records in any format and on any media, as long as you can promptly send us organized, written records in English if we ask for them. You must keep these records readily available. We may review them at any time.
- d) Send us copies of any maintenance instructions or explanations if we ask for them.
- e) Send us an annual warranty report summarizing successful warranty claims by emission family under §59.612, including the reason for the claim. You must submit the report by July 1 for the preceding calendar year.

12c. Respondent Activities

The applications are in no set format but generally follow the enumerated application requirements specified in §59.623 (see 4(b)(i) above). The respondent will have to document gasoline container specifications in detail, such as physical size, shapes, materials, quality of component fit, and production methods, in submitting its application(s) for certification. The

respondent will also perform tests and keep records on them. The respondent must collect and keep information on successful warranty claims for annual reporting. The respondent must also retain records on the units produced, apply serial numbers to individual containers, and track the serial numbers to their certificates of conformity. Many of these activities are performed in the production of any modern consumer product, but clearly some of the information is uniquely required by the gasoline container regulation.

The PFC regulation applies to all gasoline containers as defined in the regulations manufactured on or after January 1, 2009. Information collections are on a production period basis, five years in all cases so far. Warranty reports are on a calendar year basis, with reports due July 1 for the previous calendar year.

12d. Respondent Hour and Labor Burden

The previous ICR authorization was based on an estimated eight respondents for 206.9 hours and \$22,028.90 in costs, including \$12,552 for capital and O&M costs, which also includes the costs of conducting tests annually. This ICR estimates 240 total hours from nine manufacturers. This figure primarily reflects the following adjustments: we conservatively ask authorization to cover three applications per year. The EPA has started to conduct testing programs for PFC containers. Our initial testing has revealed some discrepancies between data submitted for certification and EPA test results. We have alerted manufacturers to EPA's testing for this industry and have requested new data, on occasion, to verify test results for the current model year periods applicable to this ICR. As a result, manufacturers have engaged in more testing and many have switched their testing services to fall more in line with EPA testing in the context of certification. Therefore, we have assumed manufacturers are doing new testing for each family, not relying on carryover data. One additional manufacturer and more accurate testing has resulted in a slight increase in EPA's estimate of compliance with the PFC program. However, this increase is still in line with past ICR's EPA has issued for PFC's.

This ICR does not include the costs of developing products that comply with the Clean Air Act, only the burdens of making the showing to EPA that they do. SGS, formerly Testing Services Group, which had done nearly all of the contract work, previously stated that it charges under \$2,000 for application preparation and submission and under \$5,000 for testing work. Because the facility had done a wide variety of testing, including for these respondents, it is difficult to allocate these contracted costs among labor, capital, and O&M. We have made adjustments based on a smaller sampling of the expected burden from respondents.

This ICR uses \$6,000 per application to conduct contract testing to demonstrate compliance with the PFC evaporative standard, allocated to O&M costs. Carry-over applications only require labor costs, with no testing (O&M) costs. However, in this ICR we are assuming manufacturers will be conducting new testing for their emissions families rather than relying on carrying over data from previous certification(s).

Estimating Respondent Cost

Rates for managers, mechanical engineer technicians, and administrative staff are from the May 2022 National Industry-Specific Occupational Employment and Wage Estimates https://www.bls.gov/oes/current/naics4_3330A1.htm. With an overhead multiplier of 1.31, these are \$87.47 for Managerial, \$38.12 for Engineering/Technician, and \$31.41 for Administrative hourly labor. Applying these figures to the application, warranty, and record keeping labor totals above, the total labor cost is \$10,139.44 (approximately 55 hours per family) .

RESPONDENTS	9
BURDEN HOURS	240
LABOR COST	\$8,241.84
TOTAL COST	\$29,855.51

13. RESPONDENT ANNUAL COST (NON-LABOR)

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The current ICR no longer assumes a new manufacturer that would need to be burdened with startup cost. We assume \$6,000 in O&M costs for testing, for about three new applications or renewals per year, for a total O&M cost of \$ 21,613.67 per year for the industry.

RESPONDENTS	9
OPERATING COST	\$21,613.67
CAPITALIZED COST	\$ 0
TOTAL COST	\$29,855.51

14. AGENCY BURDEN ESTIMATES

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The program is now in place and the considerable startup efforts are in the past. Currently, we estimate that it will take one GS 13, Step 10 EPA employee advocating approximately 1.1 hours of review per PFC application. There are no secretarial or database management costs, as these applications are too small to differentiate from the much larger EV-CIS baseline as part of the motor vehicle certification information collection. The EPA employee cost is \$ 103.49 per hour per certification application review. The EPA labor estimate is based on Office of Personnel Management SALARY TABLE 2022-base (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DET_h.pdf). For an estimated three applications per year, the estimated annual Agency burden is \$ 341.51. We anticipate nominal effort in eliciting and reviewing warranty action reports. To date we have received only two warranty action reports over the preceding three-year reporting period. That averages to approximately one report a year requiring warranty action, and thus one warranty action per year requiring EPA review.

EMPLOYEES	1
STARTUP	\$0
EPA LABOR HOURS	3.30
EPA LABOR COST	\$ 341.51

15.CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The program is now mature and startup costs have largely already been incurred. One successful warranty violation report has been received on an annual basis, as reported above, so warranty report applications are expected to be less time consuming. The number of manufacturers certifying PFC's is nine (9) and we do not anticipate an increase in new entrants. The increase in anticipated costs is due to the adjustment in expected testing burden and an increase in overall wages across the industry from our previous ICR. We have adjusted the labor expected for respondents according to the U.S. Bureau of Labor Statistics (BLS) estimates for the 2022 model year and we are now using a labor cost modifier also offered by BLS (1.31). Finally, we have increased the anticipated cost of contracting a PFC emission test to reflect the estimated current market rate.

16. PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Collections results are not published.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

Table 6.1a: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2023-24

Burden Item ^c	Hours ^a and Costs ^b Per Respondents						(G) Total number of respondents	(H) Total hours/year (ExG)	(I) Total labor cost (FxG)
	(A) Clerical hours per occurrence	(B) Technical hours per occurrence	(C) Management hours per occurrence ([A+B]x0.05)	(D) Annual occurrences	(E) Annual person hours ([A+B+C]xD)	(F) Labor cost/year			
1. Review Requirements ^d	5	15	1	1	21	\$2,445.92	100	2100	\$244,592.00
2. Determine Monitoring Approach ^e									
A. Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$366.89	74	233.1	\$27,149.71
B. Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$122.30	134	140.7	\$16,387.66
3. Specify Monitoring Plan Elements ^e									
A. Units without existing monitoring	4	12	0.8	1	16.8	\$1,956.74	74	1243.2	\$144,798.46
B. Units with existing monitoring	2	6	0.4	1	8.4	\$978.37	134	1125.6	\$131,101.31
4. Design Documentation ^e									
A. Units without existing monitoring	0	4	0.2	1	4.2	\$553.75	74	310.8	\$40,977.80
B. Units with existing monitoring	0	2	0.1	1	2.1	\$276.88	134	281.4	\$37,101.52
5. CAM Renewal	1	2	0.15	1	3.15	\$350.75	4324	13620.6	\$1,516,623.54
6. Prepare QIP	5	20	1.25	1	26.25	\$3,138.11	9	229.2	\$27,399.49

7. Records of Corrective Actions									
A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.2	\$23.43
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.0	\$526.26
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs.

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

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

Table 6.1b: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2024-25

Burden Item ^c	Hours ^a and Costs ^b Per Respondents						(G) Total number of respondents	(H) Total hours/year (ExG)	(I) Total labor cost (FxG)
	(A) Clerical hours per occurrence	(B) Technical hours per occurrence	(C) Management hours per occurrence ([A+B]x0.05)	(D) Annual occurrences	(E) Annual person hours ([A+B+C]xD)	(F) Labor cost/year			
1. Review Requirements ^d	5	15	1	1	21	\$2,445.92	100	2100	\$244,592.00
2. Determine Monitoring Approach ^e									
A. Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$366.89	74	233.1	\$27,149.71
B. Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$122.30	134	140.7	\$16,387.66
3. Specify Monitoring Plan Elements ^e									
A. Units without existing monitoring	4	12	0.8	1	16.8	\$1,956.74	74	1243.2	\$144,798.46
B. Units with existing monitoring	2	6	0.4	1	8.4	\$978.37	134	1125.6	\$131,101.31
4. Design Documentation ^e									
A. Units without existing monitoring	0	4	0.2	1	4.2	\$553.75	74	310.8	\$40,977.80
B. Units with existing monitoring	0	2	0.1	1	2.1	\$276.88	134	281.4	\$37,101.52
5. CAM Renewal	1	2	0.15	1	3.15	\$350.75	4324	13620.6	\$1,516,623.54
6. Prepare QIP	5	20	1.25	1	26.25	\$3,138.11	9	231.378	\$27,660.58

7. Records of Corrective Actions									
A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.179865	\$23.71
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.02801	\$531.08
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

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

Table 6.1c: Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2025-26

A. PSEUs with instrumental systems	0	0.15	0.0075	1	0.1575	\$20.77	1	0.182007	\$24.00
B. PSEUs using work practices	0	0.5	0.025	1	0.525	\$69.22	8	4.06455	\$535.90
8. Reporting of Corrective Actions	0	0.5	0.025	2	1.05	\$138.44	9	9.45	\$1,245.95
9. Facility Certification ^f	0.7	0	0.035	1	0.735	\$51.71	0	0	\$0.00
Total Labor Burden and Costs (rounded) ^g								19,300	\$2,190,000
Total Capital and O&M Cost (rounded) ^g									\$0
GRAND TOTAL (rounded) ^g									\$2,190,000

Assumptions:

^a All hours are per PSEU unless otherwise noted.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 See section 4(b)(ii) for a description of these activities.

^d Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs

^e One-time activity.

^f 3 hours per facility converted to impact per PSEU by dividing by the average number of PSEUs per facility with at least one PSEU (4.27).

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

Table 6.2a: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2023-24

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
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	occurrence ^b		year (AxB)	year (Cx0.05)	
1. CAM Activities					
A. Rule familiarization ^d	12	117	1404	70.2	\$81,688.93
B. Determine applicability	0.67	208	139.36	6.968	\$8,108.38
2. Initial CAM Review					
A. Units without existing monitoring	2	74	148	7.4	\$8,611.08
B. Units with existing monitoring	1	134	134	6.7	\$7,796.52
3. Evaluate CAM Renewals	0.5	4324	2162	108.1	\$125,791.65
4. Review QIPs	1	9	9	0.44	\$508.01
5. Review Reports of Corrective Actions	0.5	18	9	0.45	\$523.65
6. Review Annual Facility Certifications	0.33	0	0	0	\$0.00
TOTAL (rounded) ^e			4,010	200	\$233,000

Assumptions:

^a See section 4(b)(ii) for a description of these activities.

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

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

Table 6.2b: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2024-25

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
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	occurrence ^b		year (AxB)	year (Cx0.05)	
1. CAM Activities					
A. Rule familiarization ^d	12	117	1404	70.2	\$81,688.93
B. Determine applicability	0.67	208	139.36	6.968	\$8,108.38
2. Initial CAM Review					
A. Units without existing monitoring	2	74	148	7.4	\$8,611.08
B. Units with existing monitoring	1	134	134	6.7	\$7,796.52
3. Evaluate CAM Renewals	0.5	4324	2162	108.1	\$125,791.65
4. Review QIPs	1	9	9	0.44	\$512.85
5. Review Reports of Corrective Actions	0.5	18	9	0.45	\$523.65
6. Review Annual Facility Certifications	0.33	0	0	0	\$0.00
TOTAL (rounded) ^h			4,010	200	\$233,000

Assumptions:

^a See section 4(b)(ii) for a description of these activities.

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

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

Table 6.2c: Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2025-26

Burden item ^a	(A) Technical hours per	(B) Occurrences per year	(C) Technical hours per	(D) Management hours per	(E) Total cost per year ^c
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		occurrence ^b		year (AxB)	year (Cx0.05)				
Table 4.3A: Estimated Labor Hours and Costs for All "Large" and "Other" Sources - All Pollutants, 2024-26									
A. Rule familiarization ^d		12		117	1404	70.2	\$81,688.93	Three Year Total	
CAM Activities		Annual Burden							
B. Determine applicability		0.67		208	139.36	6,968	\$8,108.38		
		Technical	Management	Total Hours	Annual Cost ^b	Technical	Management	Total Hours	Annual Cost
2. Initial CAM Review		Hours	Hours			Hours	Hours		
A. Units without existing monitoring		114	6 2	74	148	7.4	\$8,611.08	359	\$19,899
a				120	\$6,633	342	17		
B. Units with existing monitoring			1	134	134	6.7	\$7,796.52		
3. Review CAM Plans ^a		1786	94 0.5	1880	\$104,260	108.58	\$25,791.65	5640	\$312,780
4. Review QIPs			1	9	9	0.44	\$517.69	5999	\$333,000
Total Cost and Burden (rounded) ^c		1900	100	2000	\$111,000	5700	299		
5. Review Reports of Corrective Actions			0.5	18	9	0.45	\$523.65		
6. Review Annual Facility Certifications			0.33	0	0	0	\$0.00		
^a We assumed 0.1 FTEs, or 200 hours per region per year; 200 hours/region * 10 regions = 2,000 hours/yr. We assumed the majority of the time is spent reviewing CAM Plans, so ^b was allocated to Rule familiarization for new staff.					4,010	200	\$233,000		

^b The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

^a See section 4(b)(ii) for a description of these activities.

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

^b All hours are per PSEU unless otherwise noted.

^c The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%) and Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

^d Burden for Rule Familiarization is per Permitting Authority (PA), of which there are 117. Because this is a mature program, PAs are generally familiar with the CAM Rule, but we include 12 hours/year per PA for new staff to become familiar with the rule.

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

Table 6.4: Average Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual Total Hours	Annual Labor Cost	Annual Capital & O&M Cost	Total Annual Cost
2023 - 24	19,300	\$2,190,000	\$0	\$2,190,000
2024 - 25	19,300	\$2,190,000	\$0	\$2,190,000
2025 - 26	19,300	\$2,190,000	\$0	\$2,190,000
Total	57,900	\$6,570,000	\$0	\$6,570,000
Average	19,300	\$2,190,000	\$0	\$2,190,000

Year	# PSEUs Subject to CAM	Annual Total Hours	Hours per PSEU	Hours per Facility ^a
2023 - 24	21,828	19300	1	4
2024 - 25	22,036	19300	1	4
2025 - 26	22,244	19300	1	4
Total	66,108	57900	3	11
Average	22,036	19300	1	4

^a Assumes 4.27 PSEUs per facility

Table 6.5: Average Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual Total Hours	Total Annual Cost
2023 - 24	4,210	\$233,000
2024 - 25	4,210	\$233,000
2025 - 26	4,210	\$233,000
Total	12,631	\$699,000
Average	4,210	\$233,000

Table 6.6: Total Estimated Respondent Burden and Cost Summary

Type of respondent	Average annual number of respondents	Average annual labor hours	Average annual labor cost	Average annual capital and O&M cost	Average total annual cost	Average annual labor hours per respondent	Average annual cost per respondent
Sources ^a	22,036	19,300	\$2,190,000	\$0	\$2,190,000	1	\$99
PAs	117	4,210	\$233,000	\$0	\$233,000	36	\$1,991
Total (rounded) ^b	22,200	23,500	\$2,420,000	\$0	\$2,420,000		

^a For sources, the number of respondents is the number of PSEUs subject to the CAM Rule. There are an average of 4.27 affected PSEUs per facility with at least one PSEU.

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