

# ATTACHMENT A

## Part A – Consultation Notes

### 1. SCS Engineers Response

1. The interviewee indicated that her firm provides engineering or technical support to facilities subject to SPCC regulation.
2. The interviewee is a project manager at SCS Engineers.
3. The interviewee did not need to be reminded of what the SPCC regulation was.
4. The interviewee has worked on 100 SPCC Plans over last 5 years.
5. SCS Engineers develops and certifies plans for all types of facilities, from small to large, except for farms. SCS Engineers mainly works on plans for oil storage, oil distribution, and oil production facilities.
6. SCS Engineers prices their SPCC plan services based on both T&M (time and materials) and fixed price, depending on the nature of the project.
7. **STORAGE FACILITIES**– Hours estimates provided by EPA were lower than what SCS provided.
  - a. The interviewee had prepared a new Plan for a new facility.
  - b. See Table 2 for total hours estimates.
  - c. See Table 2 for percentage hours estimates by labor category.

**Table 1: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	10-20%	60%	10%	10%	30-40
	Category II	10-20%	60%	10%	10%	35-45
	Category III	10%	60%	20%	10%	50-60
	Category IV	10%	60%	20%	10%	60-80

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 3 for total hours estimates and percentages by labor category.
- f. In general, EPA's number of hours were high.

**Table 2: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	10%	70%	10%	10%	10-15
	Category II	10%	70%	10%	10%	15-20
	Category III	10%	60%	20%	10%	20-25
	Category IV	10%	60%	20%	10%	20-25

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. See Table 4 for total hours estimates and percentages by labor category.
- i. Hours estimates appeared reasonable to SCS but they would include hours for drafters.

**Table 3: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	10%	70%	10%	10%	5-10
	Category II	10%	70%	10%	10%	10-15
	Category III	10%	60%	20%	10%	20
	Category IV	10%	60%	20%	10%	20-30

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for total hours estimates.
- l. See Table 5 for hours estimates by labor category.

**Table 4: Hours for creating facility diagram**

		Annual Hours Burden				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	10%	25%	65%	-	5-10
	Category II	10%	25%	65%	-	10-15
	Category III	10%	25%	65%	-	30
	Category IV	10%	25%	65%	-	40-60

- 8. The interviewee had not worked on SPCC plans for production companies.

**2. Yorke Engineers Response**

- 1. The interviewees indicated that his firm provides engineering or technical support to facilities subject to SPCC regulation.
- 2. The interviewees are Senior Engineers at Yorke Engineers.
- 3. The interviewees did not need to be reminded of what the SPCC regulation was.
- 4. The interviewees have worked on more than 300 SPCC Plans over the last five years.
- 5. The interviewees have worked on a variety of facilities except for farms. They work mainly with manufacturing facilities but provide services to facilities of all sizes and types.
- 6. Yorke Engineers prices SPCC Plan development as T&M and fixed prices. The smaller the project more likely to use fixed price, i.e., Tier I plans.
- 7. **STORAGE FACILITIES**– Hours estimates provided by EPA were lower than what Yorke Engineers provided.
  - a. The interviewee had prepared a new Plan for a new facility.
  - b. See Table 2 for total hours estimates.
  - c. See Table 2 for hours estimates by labor category.

**Table 5: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	16	2	1	20
	Category II	2.5	40	5	2.5	50
	Category III	3	48	6	3	60
	Category IV	5-6	80-100	10-12.5	5-6	100 - 125

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 3 for total hours estimates.
- f. See Table 3 for hours estimates by labor category.

**Table 6: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	.5	6	1	.5	8
	Category II	1-2	9-12	2-3	1-2	12 - 20
	Category III	2	12-16	3-4	2	16 - 24
	Category IV	2-3	35	4	2-3	44

- g. The interviewee had prepared a five-year review of an existing Plan
- h. See Table 4 for total hours estimates.
- i. See Table 4 for hours estimates by labor category.

**Table 7: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	3	0	0	4
	Category II	2	6	0	0	8
	Category III	3-4	9-12	0	0	12-16
	Category IV	3-4	9-12	0	0	12-16

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for total hours estimates.
- l. See Table 5 for hours estimates by labor category.

**Table 8: Hours for creating facility diagram**

		Annual Hours Burden				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	0	0	0	0	0
	Category II	.5	1.5	2	0	4
	Category III	1	1.5-3	2.5-4	0	5 - 8
	Category IV	3	9	12	0	24

8. **PRODUCTION FACILITIES**– Hours estimates provided by EPA were lower than what Yorke Engineers provided.

- a. The interviewee had prepared a new Plan for a new facility.
- b. See Table 2 for total hours estimates.
- c. See Table 2 for hours estimates by labor category.

**Table 6: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b> <b>e</b>	Category I	2	18	3	2	25
	Category II	3	46	7	3	60
	Category III	4.5	52	12	4.5	75
	Category IV	8	96-116	14-18	8	125 - 150

- d. The interviewee had prepared technical amendments to an existing SPCC Plan.
- e. See Table 3 for total hours estimates.
- f. See Table 3 for hours estimates by labor category.

**Table 7: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1	8	2	1	12
	Category II	2-3	9-15	3-4	2-3	16 - 25
	Category III	3-4	14-18	6	3-4	25 - 32
	Category IV	4-5	38	8	4-5	55

- g. The interviewee had prepared a five-year review of an existing Plan
- h. See Table 4 for total hours estimates.
- i. See Table 4 for hours estimates by labor category.

**Table 8: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	1.5	3.5	0	0	5
	Category II	3	7	0	0	10
	Category III	5-6	11-14	0	0	16-20
	Category IV	5-6	11-14	0	0	16-20

- j. The interviewee had developed a SPCC facility diagram.
- k. See Table 5 for total hours estimates.
- l. See Table 5 for hours estimates by labor category.

**Table 9: Hours for creating facility diagram**

		Annual Hours Burden				
		Management	Technical	Drafter	Clerical	Total
Storage	Category I	0	0	0	0	0
	Category II	.5-1	1.5-2	2.5	0	5
	Category III	1.5	2-3.5	3.5-5	0	7 - 10
	Category IV	5	10	15	0	30

**3. WithersRavenel Response**

1. The interviewee indicated that his firm provides engineering or technical support to facilities subject to SPCC regulation.
2. The interviewee is a senior environmental engineer at WithersRavenel.
3. The interviewee did not need to be reminded of what the SPCC regulation was.
4. The interviewee personally had worked on 50 SPCC Plans over the last 5 years.
5. The types of facilities WithersRavenel develops SPCC Plans for include mostly oil storage and equipment facilities, but they also prepare plans for concrete warehouses, ethanol storage facilities, water treatment and pumping facilities, airport and municipal facilities, and chemical plants. They do not work with farms or production facilities.
6. WithersRavenel prices SPCC Plan development as mostly time and materials but sometimes as fixed price. Pricing depends on client and scope.
7. **STORAGE FACILITIES** - Hours estimates provided by EPA largely the same as what WithersRavenel provided.
  - a. The interviewee had prepared a new Plan for a new facility (only Categories I and II).
  - b. The total number of hours required to prepare a new Plan are 48 (Category I) and 96 (Category II).
  - c. See Table 2 for hours estimates by labor category.

**Table 9: Hours for preparation of new SPCC Plan for new facilities**

		Management	Technical	Drafter	Clerical	Total
Storage	Category I	2	30	12	4	48
	Category II	4	60	24	8	96
	Category III	n/a	n/a	n/a	n/a	n/a
	Category IV	n/a	n/a	n/a	n/a	n/a

- d. The interviewee had done technical amendments to an existing SPCC Plan.
- e. The total number of hours required to amend an existing Plan are 22 (Category I) and 41 (Category II).
- f. See Table 3 for hours estimates by labor category.

**Table 10: Hours for Plan amendment for new and existing facilities**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	3	15	2	2	22
	Category II	5	30	2	4	41
	Category III	n/a	n/a	-	n/a	n/a
	Category IV	n/a	n/a	-	n/a	n/a

- g. The interviewee had prepared a five-year review of an existing Plan.
- h. The total number of hours required to conduct a five-year review are 19 (Category I) and 34 (Category II).
- i. See Table 4 for hours estimates by labor category.

**Table 11: Hours for five-year review for existing Plan**

		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	2	15	-	2	19
	Category II	2	30	-	2	34
	Category III	n/a	n/a	-	n/a	n/a
	Category IV	n/a	n/a	-	n/a	n/a

- j. The interviewee had developed an SPCC facility diagram.
- k. See Table 5 for hours estimates by labor category.

**Table 12: Hours for creating facility diagram**

		<u>Annual Hours Burden</u>				
		Management	Technical	Drafter	Clerical	Total
<b>Storage</b>	Category I	0.5	4	12	-	17
	Category II	1	8	24	-	33
	Category III	n/a	n/a	n/a	-	n/a
	Category IV	n/a	n/a	n/a	-	n/a

- 8. The interviewee had not worked on SPCC plans for production companies.