ICR Summary Information (Subpart GGG)

Hours per Response	560
Number of Respondents	116
Total Estimated Burden Hours	130,000
Total Estimated Costs	$15,600,000
Annualized Capital O&M	$0
Total Annual Responses	232

ICR Summary Information (Subpart GGGa)

Hours per Response	584
Number of Respondents	46
Total Estimated Burden Hours	53,700
Total Estimated Costs	$6,440,000
Annualized Capital O&M	$0
Total Annual Responses	92

Table 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Total Labor Costs per Year [b]
1. Applications	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Surveys and Studies	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements	1	1	1	116	116	5.8	11.6	$16,016.41
B. Required Activities								
i. Initial performance tests	24	1	24	0	0	0	0	$0
ii. Repeat performance tests[c]	24	1	24	0	0	0	0	$0
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write Report								
i. Notification of Construction/Reconstruction [d]	2	1	2	0	0	0	0	$0
ii. Notification of Anticipated Startup [d]	2	1	2	0	0	0	0	$0
iii. Notification of Actual Startup [e]	2	1	2	0	0	0	0	$0
iv. Notification of Initial Performance Test [d]	2	1	2	0	0	0	0	$0
v. Report of Performance Test	See 3B							
vi. Semiannual Work Practice Reports [e, f]	30	2	60	116	6,960	348	696	$960,984.60
Subtotal for Reporting Requirements					***8,137***			***$977,001***
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 3A							
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							
D. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information								

i. Records of Operating Parameters [f, g]	2.5	365	912.5	116	105,850	5,292.5	10,585	$14,614,974.13
F. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Subtotal for Recordkeeping Requirements					**121,728**			**$14,614,974**
Total Labor Burden and Costs (rounded) [h]					**130,000**			**$15,600,000**
Total Capital and O&M Costs (rounded) [h]								**$0**
Grand Total (rounded) [h]					**130,000**			**$15,600,000**

Table 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petrol Subpart GGGa) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (E=C x D)
1. Applications	N/A	N/A	N/A	N/A	N/A
2. Surveys and studies	N/A	N/A	N/A	N/A	N/A
3. Reporting Requirements					
A. Familiarization with Regulatory Requirements	1	1	1	46	46
B. Required Activities					
i. Initial Performance Tests	24	1	24	0	0
ii. Repeat performance tests [c]	24	1	24	0	0
C. Create Information	See 3B				
D. Gather Existing Information	See 3E				
E. Write Report					
i. Notification of Construction/Reconstruction [d]	2	1	2	0	0
ii. Notification of Anticipated Startup [d]	2	1	2	0	0
iii. Notification of Actual Startup [d]	2	1	2	0	0
iv. Notification of Initial Performance Test [d]	2	1	2	0	0
v. Report of Performance Test	See 3B				
vi. Semiannual Work Practice Reports at Large Refineries [e, f]	30	2	60	34.5	2,070
vii. Semiannual Work Practice Reports at Small Refineries [e, f]	8	2	16	11.5	184
Subtotal for Reporting Requirements					
4. Recordkeeping Requirements					
A. Familiarization with Regulatory Requirements	See 3A				
B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information					
i. Records of Operating Parameters at Large Refineries [g, h]	2.64	365	964	40.25	38,785
ii. Records of Operating Parameters at Small Refineries [g, h]	2.66	365	971	5.75	5,583
F. Train Personnel	N/A	N/A	N/A	N/A	N/A
G. Audits	N/A	N/A	N/A	N/A	N/A
Subtotal for Recordkeeping Requirements					

Total Labor Burden and Costs (rounded) [i]					
Total Capital and O&M Costs (rounded) [i]					
Grand Total (rounded) [i]					

Assumptions

[a] We assume that an average of 46 refineries per year will be subject to the requirements of NSPS Subpart GGGa and that rule during the three-year period of this ICR. All facilities that commence construction, reconstruction, or modification aft GGGa.

[b] This ICR uses the following labor rates: $157.61 ($75.05 + 110%) for managerial, $123.94 ($59.02 + 110%) for technic labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2 industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to acc additional overhead business costs of employing workers beyond their wages and benefits, including business expenses as their employees.

[c] Assume 20% of initial performance tests must repeat due to failure.

[d] Owners or operators of the affected facilities must make one-time-only notifications.

[e] The time to prepare reports is estimated to be the same under both subparts because the information in the new records m to be reported.

[f] Assume that 25 percent of the process units are located at small refineries (25% x 46 = 11.5). The rest are large facilities leaks and deviations so they can complete reports in less time. Larger facilities require significantly more time to complete

[g] Although monitoring of the various components may be required on a weekly, monthly, quarterly, semiannual or annual must be monitored at any facility, monitoring overall occurs daily.

Assume that large facilities need an additional 0.14 hours per day to complete the tasks required by the new standards. Th recordkeeping time for each day's worth of monitoring for large facilities for Subpart GGGa is 2.64 hours and that monitc Footnote G for the calculation for the time for calibration.

Small facilities may record instrument readings manually, so an additional 0.02 hours per day are needed for small refiner readings. Therefore, it is assumed that the average recordkeeping time for each day's worth of monitoring for small facilit monitoring is done 365 days a year.

[h] Assume that 25 percent of the process units are located at small refineries and half of those use manual recordkeeping of and that 75 percent of the process units are located at large refineries (46 x 75% = 34.5) and thus the number of process ur recordkeeping is (5.75 + 34.5 = 40.25)

[i] Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

eum Refineries (40 CFR Part 60,

(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Total Labor Costs per Year [b]
N/A	N/A	N/A
N/A	N/A	N/A
2.3	4.6	$6,351.34
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
104	207	$285,810.08
9.2	18	$25,405.34
2,645		**$317,567**
N/A	N/A	N/A
1,939	3,878	$5,355,128.11
279	558	$770,813.89
N/A	N/A	N/A
N/A	N/A	N/A
51,023		**$6,125,942**

Labor Rates	
Management	$157.61
Technical	$123.94
Clerical	$62.52

53,700		**$6,440,000**
		$0
53,700		**$6,440,000**

hr/response

584

t no new refineries will become subject to the
ter November 7, 2006 are subject to Subpart

:al, and $62.52 ($29.77 + 110%) for clerical
. Civilian Workers, by occupational and
ount for varying industry wage rates and the
ssociated with hiring, training, and equipping

ıust be maintained on-site, but it does not have

(75% x 46 = 34.5). Small facilities have fewer
e reports.
l basis, given the number of components that

erefore, it is assumed that the average
›ring is done 365 days a year. See Table 1a,

ies with manual recordkeeping of instrument
ies for Subpart GGGa is 2.66 hours and that

instrument readings (46 x 25% x 0.5 = 5.75)
ıits that do not need additional time for manual

Table 2a: Annual Agency Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal)

Burden Item	(A) EPA Person-Hours per Occurrence	(B) Annual Occurrences per Respondent	(C) EPA Hours per Year (A x B)	(D) Plants per Year [a]	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Annual Cost [b]
Performance Test Report Review (New Plants)	4	1.2	4.8	0	0	0	0	$0
Notification of Construction	2	1	2	0	0	0	0	$0
Notification of Anticipated Startup	0.5	1	0.5	0	0	0	0	$0
Notification of Actual Startup	0.5	1	0.5	0	0	0	0	$0
Notification of Initial Test	0.5	1.2	0.6	0	0	0	0	$0
Review Test Results	8	1.2	9.6	0	0	0	0	$0
Report Review (Existing Plants)	4	2	8	116	928	46.4	92.8	$54,503.30
TOTAL (rounded) [c]					**1,070**			**$54,500**

Labor Rates	
Management	$70.56
Technical	$52.37
Clerical	$28.34

Assumptions

[a] We assume that 116 existing refineries per year will be subject to requirements of NSPS Subpart GGG during the three-year period of this ICR. This rule applies to facilities that commenced construction, reconstruction, or modification prior to November 7, 2006. All facilities that commence construction, reconstruction, or modification after November 7, 2006 are subject to Subpart GGGa.

[b] This ICR uses the following labor rates: $70.56 (GS-13, Step 5, $44.10 + 60%) for managerial, $52.37 (GS-12, Step 1, $32.73 + 60%) for technical, and $28.34 (GS-6, Step 3, $17.71 + 60%) for clerical labor. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

[c] Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2b: Annual Agency Burden and Cost - NSPS for Equipment Leaks of VOC in Petrol GGGa) (Renewal)

Burden Item	(A) EPA Person-Hours per Occurrence	(B) Annual Occurrences per Respondent	(C) EPA Hours per Year (A x B)	(D) Plants per Year [a]
Performance Test Report Review (New Plants)	4	1.2	4.8	0
Notification of Construction	2	1	2	0
Notification of Anticipated Startup	0.50	1	0.5	0
Notification of Actual Startup	0.50	1	0.5	0
Notification of Initial Test	0.50	1.2	0.6	0
Review Test Results	8.00	1.2	9.6	0
Report Review (Existing Plants)	4	2	8	46
TOTAL (rounded) [c]				

Assumptions

[a] We assume that an average of 46 refineries per year will be subject to the requirements of NSPS Subpart GGGa ar during the three-year period of this ICR. All facilities that commence construction, reconstruction, or modification a

[b] This ICR uses the following labor rates: $70.56 (GS-13, Step 5, $44.10 + 60%) for managerial, $52.37 (GS-12, S 3, $17.71 + 60%) for clerical labor. These rates are from the Office of Personnel Management (OPM), 2022 General have been increased by 60 percent to account for the benefit packages available to government employees.

[c] Totals are rounded to three significant figures. Figures may not add exactly due to rounding.

eum Refineries (40 CFR Part 60, Subpart

(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Annual Cost [b]
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
368	18.4	36.8	$21,613.38
423			**$21,600**

Labor Rates	
Management	$70.56
Technical	$52.37
Clerical	$28.34

Total
$76,100

ıd that no new refineries will become subject to the rule
fter November 7, 2006 are subject to Subpart GGGa.

tep 1, $32.73 + 60%) for technical, and $28.34 (GS-6, Step
l Schedule, which excludes locality rates of pay. The rates

Capital/Startup vs. Operation and Maintenance			
(A)	**(B)**	**(C)**	**(D)**
Continuous Monitoring Device	**Capital/Startup Cost for One Respondent**	**Number of New Respondents**	**Total Capital/Startup Cost, (B X C)**
N/A [a]			

[a] The only costs to the regulated industry resulting from information collection activities required by these s
requirements of these same standards are consistent with industry practices. VOC monitors used for leak de
impose an additional cost to the respondents. Consequently, there are no capital/startup or operation and ma

: (O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	**Number of Respondents with O&M [b]**	**Total O&M, (E X F)**

$0

subject standards are labor costs. To the extent possible, the
tection are typically used in the industry for safety reasons and do not
aintenance costs.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents [a]	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Subpart GGG				
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Performance test report	0	1	0	0
Semiannual report	116	2	0	232
Subpart GGGa				
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Performance test report	0	1	0	0
Semiannual report	46	2	0	92
			Total	**324**

[a] We assume that 116 existing refineries per year will be subject to requirements of NSPS Subpart GGG during the three-year period of this ICR. This rule applies to facilities that commenced construction, reconstruction, or modification prior to November 7, 2006. We assume that an average of 46 refineries per year will be subject to the requirements of NSPS Subpart GGGa and that no new refineries will become subject to the rule during the three-year period of this ICR. All facilities that commence construction, reconstruction, or modification after November 7, 2006 are subject to Subpart GGGa.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents [a]	Number of Existing Respondents [b]	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	116	0	0
2	0	116	0	0
3	0	116	0	0
Average	0	116	0	0

[a] New respondents include sources with constructed, reconstructed, and modified affected facilities.

[b] Over the next three years, approximately 116 respondents per year will be subject to Subpart GGG. In addition, it is ass
116 refineries are also subject to Subpart GGGa.

(E)
Number of Respondents (E=A+B+C-D)
116
116
116
116

sumed that 46 of these