

<b>Summary</b>			
Type of Respondent	Total Responses per Year	Total Hours per Year	Total Cost per Year (Labor and Non-Labor)
I-Biogas Producers	16,093	32,068	\$4,347,787
II-RNG Producers	15,620	30,807	\$4,114,902
III-RNG Importers	240	357	\$28,998
IV-SFW	1,076	4,231	\$399,188
V-Biogas Closed Distribution System RIN Generators	2,713	3,211	\$323,012
VI-QAP Providers	81	1,057	\$150,236
VII-RNG RIN separators	21,800	10,700	\$1,887,840
VIII-Third Parties	10	0	\$0
IX-Producers of Renewable Fuel from Biogas used as biointermediate or RNG used as feedstock	721	962	\$151,984
<b>GRAND TOTAL</b>	<b>58,354</b>	<b>83,393</b>	<b>\$11,403,948</b>

NOTE: QAP Providers perform third party services, are separate from other Third Parties because of they incur R&R burden directly.

NOTE: The 0 values are correct - hours and \$ are billed to their clients in these estimates and are Purchased Services to them.

<b>TOTAL NUMBER of Respondents:</b>	<b>7,835</b>
<b>Non-Labor Costs* Only:</b>	<b>\$5,684,472</b>

\*Non-Labor Costs include capital, O&M, and purchased services.

These costs are reflected in the "OMB Inventory."

Of the total, \$5,659,472 is purchased services and \$25,000 is capital, O&M.

Annual Respondent Burden and Cost by Type of Party												
Table I - Biogas Producers - assumes 176 domestic and 20 foreign respondents, for a total of 196: General Requirements in 40 CFR 80.105												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (ALL PURCHASED SERVICES)
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year (Labor and Non-Labor)		
40 CFR Part 80												
§80.105, 80.135, 80.1450, and 40 CFR part 1090 subpart I	Reporting: Registration by Biogas Producers; set up initial system accounts with EPA	1.00	0.00	0.00	92.00	196.00	1.00	196.00	196.00	18032.00	OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0.00
§80.105, 80.135, 80.1450, and 40 CFR part 1090, subpart I	Reporting: Registration by Biogas Producers; submit company and facility program registration information under 80.135 and 1090.805 and perform necessary association with third parties (auditor) following forms & procedures	1.00	0.00	0.00	92.00	196.00	1.00	196.00	196.00	18032.00	OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0.00
§80.105, 80.135, 80.1450, and 40 CFR part 1090, subpart I	Reporting: Registration by Biogas Producers; providing all detail information in 80.135	12.00	0.00	0.00	1104.00	196.00	1.00	196.00	2352.00	216384.00	OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR.	0.00
§80.105, 80.135, 80.1450, and 40 CFR part 1090, subpart I	Reporting: Registration by Biogas Producers; Third Party Engineering Review	0.00	0.00	16.00	3680.00	196.00	1.00	196.00	3136.00	721280.00	OTAQREG; assumes 48 hours, divided by 3, to annualize for ICR. All purchased services.	\$ 721,280.00
§80.105, 80.135, 80.1450, 40 CFR part 1090 subpart I	Reporting: Update registration as needed to reflect changes in information, etc.	0.50	0.00	0.00	46.00	20.00	1.00	1.00	0.50	46.00	OTAQREG; assumes 10% of respondents do this each year of this ICR.	0.00
§80.105, 80.140, 80.1451, 80.1452	Reporting: monthly batch reports that include detailed information about each batch of biogas, such as production date, volume, designation, etc.	0.50	0.00	0.00	46.00	196.00	12.00	2352.00	1176.00	108192.00	monthly RFS4100	0.00
§80.105, 80.140, 80.1451, 80.1452	Reporting: monthly batch reports that include detailed information about each batch of biogas, such as production date, volume, designation, etc.; all items listed in 80.140(b); RIN retirement for process heat	1.00	0.00	0.00	92.00	196.00	4.00	784.00	784.00	72128.00	quarterly RFS0107, RFS1701, RFS4000, RFS5400, as applicable	0.00
§80.105, 80.145, 80.1454	Recordkeeping: Internal systems updates (e.g. to program PTDS and batch number generation)	8.00	0.00	0.00	736.00	196.00	1.00	196.00	1568.00	144256.00	One time burden; 24 hours divided by 3 years to annualize	0.00
§ 80.105, 80.145, 80.1454	Recordkeeping: Assign batch numbers to volumes	1.00	0.00	0.00	92.00	196.00	12.00	2352.00	2352.00	216384.00	Assumes one batch per month and a somewhat automated process.	0.00

§80.105, 80.145, 80.1454	Recordkeeping: keep copies of registration, reporting, and other compliance records, PTDs under 80.155(a) and keep records specific to biogas production under 80.155(b), including contracts, affidavits, etc.	4.00	0.10	0.00	373.40	196.00	12.00	2352.00	9643.20	878236.80	Assumes monthly and a customary business practice (CBP) process. Assumes a minimal amount of clerical oversight daily to ensure proper filing/retention throughout the compliance period.	0.00
§80.105, 80.150 and §80.1453 or 40 CFR part 1090, subpart L, as applicable	Recordkeeping: PTD requirements	1.00	0.00	0.00	92.00	196.00	12.00	2352.00	2352.00	216384.00	Assumes monthly frequency and a somewhat automated process; PTDs are CBP.	0.00
§80.105, 80.155, and see 80.1426(f)(3)(vi)	Recordkeeping: perform/retain records of sampling, testing and measurement.	0.00	0.00	1.00	230.00	196.00	12.00	2352.00	2352.00	540,960.00	Estimate assumes a monthly frequency. Assumes all purchased services.	\$ 540,960.00
§80.105, 80.160	Reporting: additional requirements for Foreign Entities; letter from RCO, bond posting, English language translations, etc. requirements specific to foreign entities.	4.00	0.00	0.00	368.00	20.00	1.00	20.00	80.00	7360.00	CBP	0.00
§80.105, 80.165 and 80.1464; 1090.1800	Reporting: Attest Engagements (annual)	0.00	0.00	24.00	5520.00	196.00	1.00	196.00	4704.00	1,081,920.00	Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>	\$ 1,081,920.00
§80.105, 80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	46.00	196.00	12.00	2352.00	1176.00	108,192.00	We estimate all parties will participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab VI-QAP of this Appendix.	0.00
GRAND TOTAL						2,588		16,093	32,068	4,347,786.80		\$ 2,344,160.00

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-update-existing-companies-facilities-and-users>

Links to User Guides:

Engineering Review Submission Guide <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guide-engineering-review-web-forms-otaqreg>

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdcfuel-central-data-exchange-cdx>

RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moderated-transaction-system-ems>

Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements>

LIST OF NEW OR UPDATED RFS FORMS & INSTRUCTIONS ON TAB I - BIOGAS PRODUCERS: RFS0107, RFS1701, RFS4000, RFS4100, RFS5400

Annual Respondent Burden and Cost by Type of Party														
Table II - RNG Producers - assumes 100 currently registered domestic entities, plus 75 new across period covered by ICR; assumes 20 foreign, total of 195 parties. General requirements in 40 CFR 80.110.														
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (All Purchased Services)	Capital and O&M Costs	
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year				
40 CFR part 80														
\$80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; set up initial system accounts with EPA	1.00	0.00	0.00	92	95	1	95	95	8,740	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00		
\$80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: submit company and facility program registration information under 80.135 and 1090.805 and perform necessary association with third parties (auditor) following forms & procedures	1.00	0.00	0.00	92	95	1	95	95	8,740	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00		
\$80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; including the specific registration items applicable to these parties under 80.135	12.00	0.00	0.00	1,104	95	1	95	90	104,880	New registrants; OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00		
\$80.110, 80.135, 80.1450, subpart I	Reporting: Update registration as needed to reflect changes in information and changes needed due to new regulation.	12.00	0.00	0.00	1,104	100	1	100	1,200	110,400	OTAQREG; assumes 176 existing registrants will need to update registration.	0.00		
\$80.110, 80.140, 80.1451	RNG RIN-less producer report	0.33	0.00	0.00	30	195	12	2,340	772	71,042	monthly RFS4900	0.00		
\$80.110, 80.140, 80.1451, 80.1452	Reporting: EMTS (RIN generation/transactional reporting)	0.50	0.00	0.00	46	195	12	2,340	1,170	107,640	Assumes one EMTS report per month	0.00		
\$80.110, 80.140, 80.1451, 80.1452	Reporting: periodic submission of reports, as applicable: reporting parties who own RINs, RNG producer supplemental reporting, RNG RIN retirement reporting	1.00	0.00	0.00	92	195	4	780	780	71,760	quarterly RFS0107 and quarterly RFS4800, quarterly 5400	0.00		
\$80.110, 80.145, 80.1454	Recordkeeping: Internal systems updates	8.00	0.00	0.00	736	195	1	195	1,560	143,520	One time burden; 24 hours divided by 3 years to annualize	0.00		
\$80.110, 80.145, 80.1454	Recordkeeping: keep copies of registration, reporting, and other compliance records, PTDS under 80.155(a) and keep records specific to generation and assignment of RINs under 80.155(d), including contracts, affidavits, etc.	4.00	0.00	0.00	368	195	12	2,340	9,360	861,120	Assumes weekly and a customary business practice (CBP) process. Since information to be retained is somewhat detailed related to RIN generation and assignment, assumes appropriate amount of time for weekly oversight.	0.00		
\$80.110, 80.155, and see 80.1426	Recordkeeping: install meters and then perform/retain records of sampling, testing and measurement. 80.110(f) contains specific RNG producer sampling, testing, measurement in paragraphs (i)-(iii)	1.00	0.00	12.00	2,852	195	1	195	2,535	556,140	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate.	\$ 556,140.00	\$ 25,000.00	

\$80.110, 80.150 and \$80.1453 or 40 CFR part 1090, subpart L, as applicable	Recordkeeping: PTD requirements, including custodial PTDs	1.50	0.00	0.00	138	195	12	2,340	3,510	322,920	Assumes monthly frequency and a somewhat automated process; PTDs are CBP.	0.00
\$ 80.110, 80.145, 80.1454	Recordkeeping: Assign batch numbers	1.00	0.00	0.00	92	195	12	2,340	2,340	215,280	Assumes monthly and a somewhat automated process.	0.00
\$80.110, 80.160	Reporting: additional requirements for foreign RNG producers	4.00	0.00	0.00	368	20	1	20	80	7,360	CBP	0.00
\$80.165 and 80.1464	Reporting: Attest Engagements (annual)	0.00	0.00	32.00	7,360	195	1	195	6,240	1,435,200	Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>	\$ 1,435,200.00
\$80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	46	195	12	2,340	1,170	107,640	We estimate all parties will participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab VI-QAP of this Appendix.	0.00
GRAND TOTAL						2,355		15,620	30,807	4,114,902		\$ 1,991,340.00

Notes to Table: Many of these respondents are already registered/performing recordkeeping and reporting under 2060-0725, 2060-0731, 2060-0740

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-update-existing-companies-facilities-and-users>

Links to User Guides:

Engineering Review Submission Guide <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guide-engineering-review-web-forms-otaqreg>

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdcfuel-central-data-exchange-cdx>

RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moderated-transaction-system-emts>

Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements>

LIST OF NEW OR UPDATED RFS FORMS & INSTRUCTIONS ON TAB II -RNG PRODUCERS: RFS0107, RFS4800, RFS4900, RFS5400

Annual Respondent Burden and Cost by Type of Party													
Table III - RNG Importers - assumes two respondents; one existing, one new; General requirements in 40 CFR 80.110.													
Citation	Information Collection Activity	Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (All Purchased Services)	
		Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year			
40 CFR part 80													
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; set up initial system accounts with EPA	1.00	0.00	0.00	92	1	1	1	1	92		New registrants: OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0.00
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: submit company and facility program registration information under 80.135 and 1090.805 and perform necessary association with third parties (auditor) following forms & procedures	1.00	0.00	0.00	92	1	1	1	1	92		New registrants: OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0.00
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; including the specific registration items applicable to these parties under 80.135	12.00	0.00	0.00	1,104	1	1	1	90	1,104		New registrants: OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR.	0.00
§80.110, 80.135, 80.1450, subpart I	Reporting: Update registration as needed to reflect changes in information and changes needed due to new regulation.	12.00	0.00	0.00	1,104	1	1	1	12	1,104		Existing registrants: OTAQREG	0.00
§80.80.110, 80.140, 80.1452	Reporting: EMTS (RIN generation/transactional reporting)	1.00	0.00	0.00	92	2	12	24	24	2,208		Assumes one EMTS report per month; EMTS	0.00
§80.80.110, 80.140, 80.1452	Reporting: RNG importer who generates RINs for foreign producer	0.50	0.00	0.00	46	2	4	8	4	368		quarterly RFS0107	
§80.110, 80.145, 80.1454	Recordkeeping: Internal systems updates	8.00	0.00	0.00	736	2	1	2	16	1,472		One time burden; 24 hours divided by 3 years to annualize	0.00
§80.110, 80.145, 80.1454	Recordkeeping: keep copies of registration, reporting, and other compliance records, PTDs under 80.155(a) and keep records specific to generation and assignment of RINs under 80.153(d), including contracts, affidavits, etc.	1.00	0.00	0.00	92	2	12	24	24	2,208		Assumes monthly and a customary business practice (CBP) process. Since information to be retained is somewhat detailed related to RIN generation and assignment, assumes appropriate amount of time for weekly oversight.	0.00
§80.110, 80.150 and 80.1453 or 40 CFR part 1090, subpart I, as applicable	Recordkeeping: PTD requirements	0.05	0.00	0.00	5	2	52	104	5	478		Assumes weekly frequency and a somewhat automated process; PTDs are CBP	0.00
§ 80.110, 80.145, 80.1454	Recordkeeping: Assign batch numbers	2.00	0.00	0.00	184	2	12	24	48	4,416		Assumes one batch per month and a somewhat automated process.	0.00
§80.110, 80.160	Recordkeeping: Independent third party determination; third party gives report to the regulated party who keeps it; see detail in 80.160(h)	4.00	0.00	0.00	368	2	12	24	96	8,832		Assumes one instance per month.	\$ 8,832.00
§80.110, 80.165 and 80.1464	Reporting: Attest Engagements (annual)	0.00	0.00	12.00	2,760	2	1	2	24	5,520		Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>	\$ 5,520.00
§80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	46	2	12	24	12	1,104		We estimate all parties will participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab VI-QAP of this Appendix.	0.00
GRAND TOTAL						22		240	357	28,998			\$ 14,352.00

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-update-existing-companies-facilities-and-users>

Links to User Guides:

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdc-fuel-central-data-exchange-cdx>

RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moderated-transactional-system-emts>

Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements>

LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB III - BIOGAS IMPORTERS: RFS0107

Annual Respondent Burden and Cost by Type of Party												
Table IV - Parties who Use Alternative Recordkeeping for SFW: RF Producer or Biointermediate Producer who produces fuel from Separated yard waste, Separated food waste (SFW), or biogenic waste/fats/greases who uses feedstock aggregator; Alternative Recordkeeping provisions of 80.1479; assumes 35 RF Producers, 5 Biointermediate Producers, and 40 Feedstock Aggregators.												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
80.1454, 80.1479, 1090.805	Reporting: Registration of Feedstock Aggregator	4.00	0.00	0.00	368	40	1	40	160	14720	OTAQREG	0
80.1471(f), 80.1479	Recordkeeping: RF Producer or Biojoint Producer QAP; reports submitted by QAP provider, see Tab VI; recordkeeping only	0.00	0.00	2.00	460	35	1	35	70	16100	We estimate RF producers, since biointermediate producers already required to participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab VI-QAP of this Appendix.	16100.00
80.1454, 80.1479	Recordkeeping: feedstock aggregator to keep records for collection	4.00	0.00	0.00	368	40	1	40	160	14720	CBP	0
80.1453, 80.1479	Recordkeeping: PTD use	4.00	0.00	0.00	368	80	12	960	3840	353280	CBP; assumes one PTD per month	0
80.1453(f), 80.1479	Recordkeeping: PTD requirements; initial programming by feedstock aggregator	4.00	0.00	0.00	368	40	1	1	1	368	CBP; assumes 12 hour one-time burden divided by 3 years to annualize	0
GRAND TOTAL						235		1,076	4,231	399,188		\$ 16,100.00

Note to Table: These parties are already registered and conducting recordkeeping under 2060-0725, 2060-0731, 2060-0740; table address alternative recordkeeping only for them.

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-update-existing-companies-facilities-and-users>

**LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB IV - SFW: RFS0107, RFS1701**

(However, note that RFS0107 and RFS1700 forms that may already applicable to these parties under 2060-0725, 2060-0740 have minor edits with no additional burden.)

Annual Respondent Burden and Cost by Type of Party												
Table 4 - BCDS RIN Generators* - assumes 25 existing plus 5 new; 30 total												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
40 CFR Part 80												
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; set up initial system accounts with EPA	1.00	0.00	0.00	92	5	1	5	5	460	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; updates registration as needed; for changes in information, address, etc.	1.00	0.00	0.00	92	3	1	3	3	276	Assumes 10% of total parties	0
§80.110, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: submit company and facility program registration information under 80.145(e)(1) and 1090.805 and perform necessary association with third parties (auditor) following forms & procedures	1.00	0.00	0.00	92	5	1	5	5	460	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.	0
§80.110, 80.140, 80.1451	Reporting: quarterly reports - biogas closed system under 80.140	0.50	0.00	0.00	46	30	12	360	180	16,560	monthly RFS5000	0
§80.110, 80.140, 80.1451	Reporting: quarterly reports - biogas closed system under 80.140 - dispensing report	0.50	0.00	0.00	46	30	12	360	180	16,560	monthly RFS5100	0
§80.110, 80.140, 80.1451, 80.1452	Reporting: EMTS (RIN generation/transactional reporting)	1.00	0.00	0.00	92	30	12	360	360	33,120	Assumes one EMTS report per week; EMTS; quarterly RFS0107; higher monthly frequency used to calculate.	0
§80.110, 80.145, 80.1454	Recordkeeping: Internal systems updates	8.00	0.00	0.00	736	30	1	30	240	22,080	One time burden; 24 hours divided by 3 years to annualize	0



§80.110, 80.145, 80.1454	Recordkeeping: keep copies of registration, reporting, and other compliance records, PTDs under 80.155(a) and keep records specific to generation and assignment of RINs under 80.155(d), including contracts, affidavits, etc.	4.00	0.00	0.00	368	30	12	360	1440	132,480	Assumes weekly and a customary business practice (CBP) process. Since information to be retained is somewhat detailed related to RIN generation and assignment, assumes appropriate amount of time for weekly oversight.	0
§80.110, 80.150 and §80.1	Recordkeeping: PTD requirements	0.05	0.00	0.00	5	30	12	360	18	1,656	Assumes monthly frequency and a somewhat automated process; PTDs are CBP.	0
§ 80.110, 80.145, 80.1454	Recordkeeping: Assign batch numbers	0.50	0.00	0.00	46	30	12	360	180	16,560	Assumes one batch per month and a somewhat automated process.	0
§80.110, 80.165, and 80.1464	Reporting: Attest Engagements (annual)	0.00	0.00	12.00	2760	30	1	30	360	82,800	Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>	82,800
§80.110, 80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	46	40	12	480	240	0.00	We estimate all parties will participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab VI-QAP of this Appendix.	0
GRAND TOTAL						293		2,713	3,211	323,012		82,800

Note to Table: Assumes most of these parties are already registered and performing recordkeeping/reporting under 2060-0725, 2060-0731, 2060-0740; new burden associated with final rule.

LIST OF NEW OR UPDATED RFS FORMS & INSTRUCTIONS ON TAB V - BCDS RIN GENERATORS: RFS0107, RFS5000, RFS100

Annual Respondent Burden and Cost by Type of Party												
Table 5 - QAP Providers* Based upon four registered QAP providers. There is not a change in burden for services already provided under 2060-0725, but the forms are modified and there may be additional clients for QAP providers.												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
40 CFR Part 80	Registration: initial or update to registration steps											
\$80.135		1	0	0	92	1	1	1	1	92	OTAQREG; assumes 3 hours divided by 3 to annualize burden	0
\$80.170, 80.1451	Reporting: Batch Verification (4x/year)	10.00	0.00	0.00	920	4	4	16	160	14,720	quarterly RFS2001	0
\$80.170, 80.1451	Reporting: Agreggate RIN Verification (4x/year)	5.00	0.00	0.00	460	4	4	16	80	7,360	quarterly RFS2101	0
\$ 80.170, 80.1451(g)	Reporting: On-Site Audit Report (4x/year)	10.00	0.00	0.00	920	4	4	16	160	14,720	quarterly RFS2201	0
\$80.170, 80.1451(g)	Reporting: Mass Balance	15.00	0.00	24.00	6,900	4	4	16	624	110,400	quarterly RFS2400	0
\$80.170, 80.185, 80.1474	Reporting: Potentially Invalid RINs (4x/year)	2.00	0.00	0.00	184	4	4	16	32	2,944	quarterly RFS2301	0
GRAND TOTAL						21		81	1,057	150,236		0

Notes to the Table:

Assumes no new registrants as a result of this proposed rule, but assumes additional reporting burden, as a result of new regulations.  
 QAP providers already perform recordkeeping and reporting under 2060-0725, 2060-0731, 2060-0740; table represents new activities based on final rule.

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>  
 How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-update-existing-companies-facilities-and-users>

Links to User Guides:

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdcfuel-central-data-exchange-cdx>

LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB VI - QAP PROVIDERS: RFS2001, RFS2101, RFS2201, RFS2301, RFS2400

I am not sure how many responses, 12 was a place holder.

Table 6 - RNG RIN Separators - estimate 200 new registran

Information Collection Activity		Hours and Cost			
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)
§80.115, 80.135, 80.1450, subpart I	Reporting: Registration; set up initial system accounts with EPA	1	0	0	92
§80.115, 80.135, 80.1450, subpart I	Reporting: submit company and facility program registration information and perform necessary association with third parties (auditor) following forms & procedures	1	0	0	92
§80.115, 80.135, 80.1450, subpart I	Reporting: Registration; including the specific registration items applicable to these parties under 80.135(e)	2	0	0	184
80.140, 80.1451, 80.1452	Reporting of RIN separations in EMTS	1	0	0	92
§80.140, 80.1451, 1452	Reporting: quarterly reporting by separators under 80.140, as applicable	1	0	0	92
§80.140, 80.1451, 1452	Reporting: monthly reporting by separators under 80.140	0.5	0	0	46
§80.140, 80.1451, 1452	Reporting: monthly reporting by separators under 80.140	0.5	0	0	46
§80.115, 80.145, 80.1454	Recordkeeping: Internal systems updates	8	0	0	736
§80.115, 80.155,	Recordkeeping: perform/retain records of sampling, testing and measurement related to continuous measurement of natural gas withdrawn from national gas commercial pipeline system.	0	0	1	230
§80.115, 80.150 and §80.1453 or 40 CFR part 1090, subpart L, as applicable	Recordkeeping: PTD requirements	0.05	0	0	4.6

§80.115, 80.165 and 80.1464	Reporting: Attest Engagements (annual)	0	0	12	2760
GRAND TOTAL					

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-to-register-a-new-company-in-otaqreg>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-to-update-existing-companies-facilities-and-users>

Links to User Guides:

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdc>

RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moderate>

Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-atte>

**LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB VII - RNG RIN SEPARATORS: RFS0107, RFS5200, RFS5300**

ist by Type of Party

ts; general requirements in 40 CFR 80.115.

Total Hours and Cost					Forms & Notes
Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year	
200	1	200	200	18400	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.
200	1	200	200	18400	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.
200	1	200	90	36800	New registrants; OTAQREG; assumes 6 hours, divided by 3, to annualize for ICR.
200	12	2400	90	220800	EMTS
200	4	800	800	73600	quarterly RFS0107
200	12	2400	1200	110400	monthly RFS5200
200	12	2400	1200	110400	monthly RFS5300
200	1	200	1600	147200	One time burden; 24 hours divided by 3 years to annualize
200	12	2400	2400	552000	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate. Assumes all purchased services.
200	52	10400	520	47840	Assumes weekly frequency and a somewhat automated process; PTDs are CBP.

200	1	200	2400	552,000.00	Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>
2,200		21,800	10,700	1,887,840	

[w-register-new-company-facility-or-user-part-80](#)  
[-help/how-update-existing-companies-facilities-and-users](#)

[fuel-central-data-exchange-cdx](#)  
[-based-transaction-system-emts](#)  
[-attest-attest-engagements](#)

Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
0
0
0
0
0
0
0
0
0
0
\$ 552,000.00
0

552,000.00

1,104,000.00



**Table 7 - Third Party Auditors, 3PEngineers\* who register and associate with respondents for whom they sub**

Information Collection Activity		Hours and Cost			
<i>Citation</i>	<i>Activity</i>	<i>Standard Industry Mix Hours/Response</i>	<i>Clerical Only Hours/Response</i>	<i>Purchased Services Hours/Response</i>	<i>Total Cost/Response (dollars)</i>
80.1450 & 1090 subpart I	Registration by attest auditor or engineer for RFS program only	0.00	0.00	0.00	0
80.1450 & 40 CFR part 1090 subpart I	Association "handshake" within registration with client	0.00	0.00	0.00	0
GRAND TOTAL					

**Notes to the Table:**

The cost, hours, and submissions associated with third party registrants and attest engagements fully passed  
 This table exists to get an accurate respondent count, because these auditors do register with EPA .  
 Many of these parties would already be registered and performing recordkeeping and reporting under 2060-

**Helpful Registration Links - new registrants and updates:**

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>

How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>

**Links to User Guides:**

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-ota>

RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moc>

Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit>

**LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB VIII - Third Parties: none, forms appear on tabs w/ resp**

y Type of Party						
mit reports. Assumes 5 new of each. Reports appear on individual respondents' tabs.						
Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
5	1	5	0	0	OTAQ REG USER GUIDE	0
5	1	5	0	0	OTAQ REG USER GUIDE	0
10		10	0	0		0

on to regulated parties as purchased services.

0725, 2060-0731, 2060-0740.

[/how-register-new-company-facility-or-user-part-80](#)  
[ince-help/how-update-existing-companies-facilities-and-users](#)

[qdcfuel-central-data-exchange-cdx](#)  
[lerated-transaction-system-emts](#)  
[-attest-engagements](#)

**ondents for whom services are performed.**

## Annual Respondent Burden and Cost by Type of Party

**Table IX - Producers of RF from Biogas used as Biointermediate or RNG used as a feedstock - see 80.120; assumes 10 r**

Information Collection Activity		Hours and Cost				Total Hc	
Citation	Activity	Standard Industry Mix Hours/Response	Clerical Only Hours/Response	Purchased Services Hours/Response	Total Cost/Response (dollars)	Number of Respondents	Number of Responses per party/year
80.120, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; set up initial system accounts with EPA	1.00	0.00	0.00	92	10	1
80.120, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: submit company and facility program registration information under 80.135 and 1090.805 and perform necessary association with third parties (auditor) following forms & procedures	1.00	0.00	0.00	92	10	1
80.120, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Registration; including the specific registration items applicable to these parties under 80.135(g), including biogas producer and RF producer connection documentation	12.00	0.00	0.00	1,104	10	1
80.120, 80.135, 80.1450, 40 CFR part 1090, subpart I	Reporting: Update registration as needed to reflect changes in information and changes needed due to new regulation.	12.00	0.00	0.00	1,104	1	1
80.120, 80.140, 80.1451, 80.1452	Reporting: RIN retirements in EMTS.	1.00	0.00	0.00	92	10	12

80.120, 80.140, 80.1451, 80.1452	Reporting: RIN activity report, as applicable	0.50	0.00	0.00	46	10	4
80.120, 80.140, 80.1451	Reporting: quarterly reporting of retirement of RINs for RNG used as a feedstock or process heat	0.50	0.00	0.00	46	10	4
80.120, 80.145, 80.1454	Recordkeeping: create and retain records	1.00	0.00	0.00	92	10	12
80.120, 80.145, 80.1453	Recordkeeping: PTD requirements	0.50	0.00	0.00	46	10	12
80.120(f), 80.155	Recordkeeping: perform and retain continuous measurements	0.00	0.00	1.00	230	10	12
80.120, 80.165, 80.1464, 40 CFR 1090.1800, 1090,1805	Reporting: Attest Engagements (annual)	0.00	0.00	32.00	7,360	10	1
80.120, 80.170	Recordkeeping: QAP	0.50	0.00	0.00	46	10	12
GRAND TOTAL						111	

Helpful Registration Links - new registrants and updates:

How to Register a New Company in OTAQREG <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-to-register-a-new-company-in-otaqreg>  
How to Update Existing Companies Facilities and Users <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-to-update-existing-companies-facilities-and-users>

Links to User Guides:

OTAQ DC FUEL User Guides <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdcfu>  
RFS EMTS User Guide: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/users-guide-epa-moderate>  
Attest Engagement Instructions: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest>

<b>LIST OF NEW OR UPDATED FORMS &amp; INSTRUCTIONS ON TAB IX - PRODUCERS OF RF BIOGAS..</b>	<b>RFS0107, RFS5400</b>
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New respondents registering new pathways under 2060-0725.				
Hours and Cost			Forms & Notes	Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		
10	10	920	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00
10	10	920	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00
10	90	11,040	New registrants; OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR.	0.00
1	12	1,104	OTAQREG	0.00
120	120	11,040	EMTS	0.00

40	20	1,840	quarterly RFS0107	0.00
40	20	1,840	quarterly RFS5400	0.00
120	120	11,040	CBP	0.00
120	60	5,520	CBP	0.00
120	120	27,600	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate. Assumes all purchased services.	27600.00
10	320	73,600	Within system. Follow directions at <a href="https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements">https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements</a>	\$ 73,600.00
120	60	5,520	We estimate all parties will participate in QAP. QAP reports are submitted by QAP providers and are shown on Tab V-QAP of this Appendix.	5520.00
721	962	151,984		\$ 106,720.00

-register-new-company-facility-or-user-part-80  
 help/how-update-existing-companies-facilities-and-users

el-central-data-exchange-cdx  
 id-transaction-system-emts  
 t-engagements

<b>Labor Costs</b>				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour<sup>a</sup></i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial (CEO - 11-1011)	126.33	253.00	0.05	12.65
Professional/Technical (Refinery Operators - 51-8093)	41.32	83.00	0.7	58.10
Clerical (Secretaries and Administrative Assistants 43-6010)	26.88	54.00	0.2	10.80
Legal (Lawyer 23-1011)	98.36	197.00	0.05	9.85
Total Employer Cost/hour				92.00
Purchased Services <sup>b</sup>				230.00

<sup>a</sup> Overhead is calculated to be equal to the cost of labor; i.e. 2x labor cost, rounded up.

<sup>b</sup> The cost of purchased services (for example, cost of attest auditors) is calculated at 2.5 times the Total Cost. Increased from 2 times (as a result of industry consultation/comment on RFS ICR 2060-0725).

"May 2021 National Industry-Specific Occupational Employment and Wage Estimates for NAIC: US Bureau of Labor Statistics

See: [https://www.bls.gov/oes/current/naics3\\_324000.htm](https://www.bls.gov/oes/current/naics3_324000.htm) (accessed May 2, 2022).

For each labor category, mean hourly wage was selected.

I Employer

S 324000 - Petroleum and Coal Products Manufacturing”