

U.S. Environmental Protection Agency

Information Collection Request

Title: Registration of Fuels and Fuel Additives: Requirements for Manufacturers (40 CFR Part 79)

OMB Control Number: 2060-0150

EPA ICR Number: 0309.17

Abstract: In accordance with the regulations at 40 CFR Part 79, Subparts A, B, C, and D, Registration of Fuels and Fuel Additives, manufacturers of (1) motor vehicle gasoline, (2) motor vehicle diesel fuel, and (3) additives for those fuels, are required to have their products registered by the Environmental Protection Agency (EPA) prior to their introduction into commerce. Registration involves providing (1) a chemical description of the fuel or additive, (2) certain technical and marketing information, and (3) any health-effects information in company files. Manufacturers are also required to submit annual reports on production and related information. The program is run by the Compliance Division, Office of Transportation and Air Quality, Office of Air and Radiation. The information is used to (1) identify products whose evaporative or exhaust emissions may pose a particular threat to public health, thus meriting further investigation and/or regulation, (2) ensure that EPA compositional requirements are met before a product is registered and introduced into commerce, and (3) maintain a comprehensive data base of motor vehicle fuel and additive composition. Most of the compositional information has been claimed by the manufacturers as confidential business information (CBI). Lists of registered fuels and additives are available at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/registered-fuels-fuel-additives-under-part-79>. The information is collected and stored electronically. There are approximately 625 fuel manufacturers, 1,350 additive manufacturers, 1,000 registered fuels, and 9,000 registered additives. These numbers change daily. The annual cost to industry is estimated at \$2.2 million. The annual cost to the government is estimated at \$0.6 million.

Supporting Statement A

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.

Motor vehicles comprise the major source of air pollution in most urban areas, and account for about half the toxic air emissions in the United States. Congress demonstrated its strong concern for the protection of public health by providing broad legislative authority to monitor and regulate fuels, fuel additives, and their emissions. This registration program was established by the Air Quality Act of 1967, carried forward into the Clean Air Act (Act) of 1970, and strengthened in the Act's 1977 and 1990 reauthorizations.

Section 211(a) of the Act provides EPA with the authority to designate any mobile source fuel or additive for registration. Any fuel or additive with the potential for a significant emissions impact on the public would be an appropriate candidate. Once designated, it may not be introduced into commerce until it has been registered by EPA. Section 211(b) requires, for the purpose of registration, that the manufacturer provide certain compositional and related information, and available health-effects data. Section 211(b) also provides EPA with the authority to require health-effects testing. The original regulations were promulgated by the Department of Health, Education, and Welfare in 1970, and transferred to the EPA shortly thereafter. They ultimately resided at 40 CFR Part 79, and were revised in 1975, 1976, 1978, 2014, and 2020. Due to their broad public emissions exposure, motor vehicle gasolines and diesel fuels, and their additives, were designated.

Another objective of the program is the review of an additive's composition for compliance with EPA restrictions. To protect catalytic converters and other emission control devices, there are compositional limitations. On a number of occasions, the EPA has informed a manufacturer that its additive could not be registered until the formulation was modified to comply with those requirements. An added benefit of the program has been the development of a comprehensive data base of gasoline and diesel fuel/additive composition. These data have proven useful for certain fuels issues, such as the identification of additives with a high sulfur content.

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.

The lists of registered fuels and additives are available to the public at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/registered-fuels-fuel-additives-under-part-79>. The fuel, additive, and motor vehicle industries are well aware that gasolines, diesel fuels, and their additives, must be registered before they may be introduced into commerce for use in motor vehicles. A separate list of registered gasoline detergent additives is also available. These lists are frequently reviewed by consumers and the manufacturers in order to maintain an awareness of competing products. In accordance with regulations promulgated by the Mine Safety and Health Administration, only registered diesel additives may be used in diesel-powered equipment for underground coal mining.

The fuel/additive data base has proven useful in the analysis of other fuels issues. For example, the data have been used to assess the development and use of gasoline detergent additives.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of 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.

EPA Forms 3520-12, for the registration of a new fuel, and 3520-13, for the registration of a new fuel additive, have been replaced with on-line registration at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/register-or-update-fuel-or-fuel-additive-request>. EPA Forms for annual reports, 3520-12A, 3520-12Q, 3520-13A, and 3520-13B, are available at: <https://www.epa.gov/fuels->

registration-reporting-and-compliance-help/how-report-annually-fuel-and-fuel-additive and may be submitted on-line.

The manufacturers are completing formats which are very straightforward and whose basic structure dates back to 1975. We have not had complaints on the design of the formats.

Much of the information is maintained in the normal course of business, such as the chemical composition of an additive and its annual production. For information which may not normally be maintained, such as mechanisms of reaction, the manufacturer is not required to search beyond its company files. EPA and its contractor review the forms and in some cases the manufacturer must be contacted for clarification or additional information. Since most of the information is claimed as CBI, the data are handled in a secure environment. Data are input and reports generated on workstations located entirely within the locked facility and connected to the network through direct connections. EPA personnel routinely review the data that have been entered into the database. The facility is protected by an advanced security system. All of the formats and instructions are available online.

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 in Item 2 above.

To our knowledge, this is the only program which requires additive manufacturers to report the composition of their additives, and gasoline and diesel fuel manufacturers to report the usage of additives in their fuels. It is the only program under which these manufacturers must develop information on the emissions health effects of their products. Production volumes for additives are not reported elsewhere. Nowhere else are the production volumes for gasoline and diesel fuels reported in conjunction with additive usage in those fuels. Such data are necessary in order to gauge the extent of public exposure to the emissions of a fuel, additive, or particular fuel/additive combinations.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

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

The reporting requirements have been kept as simple as possible to minimize the burden on all manufacturers. EPA is not aware of any simpler format to provide the chemical descriptions and related information. Changes to the regulations in 1997 removed many small businesses from the program, by excluding those who only add oxygenates or small amounts of additives to fuels, from the definition of a fuel manufacturer. For manufacturers who merely relabel additives, which are usually small businesses, the one-time notification is very simple, and there are no annual reporting requirements.

6. CONSEQUENCES 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.

Registration of a designated fuel or additive is required only once, although the manufacturer is required to notify EPA if changes occur in the information provided. The annual reports for manufacturers are appropriate in order to monitor patterns of fuel and additive usage in a timely manner. Should the

health-effects data indicate that certain fuel/additive combinations are of concern, their history of usage would be necessary in order to assess the extent of public exposure. If these fuel/additive combinations were to experience a significant increase in usage, it would be important to know that on an annual basis.

With refiners and importers reporting their usage of additives annually, the annual production report from the additive manufacturers remains adequate. If an additive were to experience a dramatic increase in production, it would be important to have that reported on at least an annual basis.

7. GENERAL GUIDELINES

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

This collection does not exceed any of the provisions established in 5 CFR 1320.5(d)(2).

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.

A Federal Register notice (88 FR 42938) requesting public comment on this ICR was published on July 5, 2023. There were no comments on the burden statement. However, there were three recommendations made for collecting and providing access to data.

The respondent stated his objective was to balance the benefits of the Clean Air Act (CAA) statute against the costs of compliance. The respondent made three recommendations to reach the right balance between robust regulation and reasonable administrative burden, in line with the intent of the CAA.

1. Conduct a comprehensive survey to gauge manufacturers' experiences and insights into the true extent of the administrative burden they face.
2. Develop an intelligent, user-friendly online portal to further streamline the data submission process by including auto-fill fields, real-time data verification, and tooltips.
3. Provide public access to data without compromising Confidential Business Information (CBI) by developing an anonymized, aggregated database.

The EPA response to the recommendations is as follows:

1. The purpose of this ICR renewal process is to solicit input from manufacturers on the reporting burdens. Manufacturers are well-aware of this opportunity as it has been occurring approximately every three years for over thirty years. This is in essence a survey for those manufacturers that choose to participate.

2. Registration of a fuel or fuel additive is electronic and consistent with recommendation 2. The annual reports will also be converted to electronic formats, possibly by the next due date of March 31, 2024.
3. Just about all the data in this program are CBI for each manufacturer. Aggregate annual volumes for gasoline and diesel are available on other sites. General information on fuel additives is publicly available.

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.

The Agency consulted with a representative from Chevron and a representative from the fuel and fuel additive manufacturers. They generally agreed with the estimate of burden presented in the supporting statement.

The Mine Safety and Health Administration (MSHA), U. S. Department of Labor, views this program as beneficial in that it will provide information on the diesel emissions to which underground coal miners are exposed. MSHA regulations limit the diesel additives used in underground coal mining to those that have been registered by EPA.

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 made to respondents.

10. ASSURANCE OF CONFIDENTIALITY

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.

The availability to the public of information submitted for this program is governed by the Freedom of Information Act (FOIA) regulations for EPA at 40 CFR Part 2, with the exception that all health test data and other information concerning health and welfare effects, submitted pursuant to Subpart F, shall be public. Lists of the registered fuels and additives are publicly available.

The majority of the manufacturers consider, for competitive reasons, the compositional information for their fuels and additives to be confidential. Because most of the information has been claimed to be confidential, this program is housed in a separate office protected by a multi-sensor alarm system with 24-hour monitoring. Access is via a chip identification card for authorized personnel only. Paper files are secured in combination lock, fireproof cabinets with each cabinet requiring its own unique sequence to

be unlocked. Data processing is performed solely on computers in the secure area. High-level security is employed.

Contractor personnel handle routine administrative tasks, data input, data analysis, and routine registration activity. EPA personnel work closely with contractor personnel on certain technical issues and on questions involving regulatory interpretation.

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 information collection does not include any questions of a sensitive nature.

12. 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.*
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12a. Respondents/NAICS Codes

The fuel and fuel additive manufacturers are related to the following major group North American Industry Classification System (NAICS) codes:

324110 - Petroleum Refineries

324199 - All Other Petroleum and Coal Products Manufacturing

325110 - Petrochemical Manufacturing

325193 - Ethyl Alcohol Manufacturing

325199 - All Other Basic Organic Chemical Manufacturing

12b. Information Requested

The following definitions at 40 CFR 79.2 are important to the understanding of the reporting requirements:

“Fuel manufacturer” means any person who, for sale or introduction into commerce, produces, manufactures, or imports a fuel or causes or directs the alteration of the chemical composition of a bulk fuel, or the mixture of chemical compounds in a bulk fuel, by adding to it an additive, except:

(1) A party (other than a fuel refiner or importer) who adds a quantity of additive(s) amounting to less than 1.0 percent by volume of the resultant additive(s)/fuel mixture is not thereby considered a fuel manufacturer.

(2) A party (other than a fuel refiner or importer) who adds an oxygenate compound to fuel in any otherwise allowable amount is not thereby considered a fuel manufacturer.

“Additive” means any substance, other than one composed solely of carbon and/or hydrogen, that is intentionally added to a fuel named in the designation (including any added to a motor vehicle’s fuel system) and that is not intentionally removed prior to sale or use.

“Additive manufacturer” means any person who produces, manufactures, or imports an additive for use as an additive and/or sells or imports for sale such additive under the person’s own name.

Motor vehicle gasolines, motor vehicle diesel fuels, and additives to those fuels, have been designated at 40 CFR Part 79. For the purpose of registration, the following is required to be submitted by each manufacturer of a designated fuel (40 CFR 79.11): (See: How to Add a New Fuel or Fuel Additive Product on OTAQREG, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P1011OR4.pdf>. Previously this was EPA Form 3520-12, Fuel Manufacturer Notification for Motor Vehicle Fuel).

1. Brand name(s) of the fuel;
2. Company name;
3. Company identification number (issued by EPA);
4. Address;
5. Type of fuel;
6. A list of additives the manufacturer intends to use, additive manufacturer names, purpose-in-use of each additive, and range of additive concentration;
7. To the extent known, information on analytical techniques that can be used to detect the presence of the additives listed above in the fuel;
8. To the extent known to the manufacturer, information on the mechanisms of action of the additives listed, reactions between the additives and the fuel, emission products, additive effects on emissions, health or welfare effects of additive emission products, and effects of additive emission products on emission controls;
9. Anticipated sales, in percent, by Petroleum Administration for Defense Districts;
10. Yes/no response on if fuel is derived only from conventional petroleum, heavy oil deposits, coal, tar sands, and/or oil sands:
11. If applying for a small business provision, annual sales revenue for the past three years and identification of any parent company;
12. If not applicable for a small business provision, identification of membership in a testing group;
13. Indication of which portions of the form are confidential;
14. List of attachments;
15. Assurances that the information is correct, EPA will be notified in writing if certain information were to change, and that registration will not be used in advertising to imply government approval;
16. Sign electronically, certify, and submit.

Note that in item 15 above the manufacturer is required to notify EPA if certain information, listed in the regulations, were to change. This usually involves updating the list of additives being used and is accomplished electronically via the instructions at: <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1011OSF.pdf>. This will be referred to later in this ICR as a “fuel update.”

For the purpose of registration, the following is required to be submitted by each manufacturer of a designated fuel additive (40 CFR 79.21): (See: How to Add a New Fuel or Fuel Additive Product in OTAQREG, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1011OR4.pdf>. Previously this was EPA Form 3520-13, Fuel Additive Manufacturer Notification.)

1. Commercial name(s) of the additive;
2. Company name and company identification number (issued by EPA);
3. Address;
4. Method of use (bulk and/or aftermarket);
5. Fuels for which the additive is recommended and range of concentration;
6. Recommended purpose-in-use of the additive;
7. Chemical composition of the additive;
8. Chemical structure of the additive;
9. To the extent known, impurities at greater 0.1% by weight;
10. To the extent known, information on analytical techniques that can be used to detect the additive in fuel;
11. To the extent known to the manufacturer, information on additive mechanisms of action, reactions between the additive and fuel, identification and measurement of additive emission products, effects of the additive on emissions, toxicity or any other health effects of the additive emission products, and effects on emission controls;
12. Yes/no response on if the additive is a relabel of a currently registered additive;
13. Estimated annual production during the third year of production;
14. Estimated market distribution for the third year of production;
15. Yes/no response on if the additive is derived only from conventional petroleum, heavy oil deposits, coal, tar sands, and/or oil sands;
16. If applying for a small business provision, annual sales revenue for the past three years and identification of any parent company;
17. Yes/no response on if the additive is an aerosol, and if so, if applying for the aerosol provision;
18. If not applicable for a small business or aerosol provision, identification of membership in a testing group;
19. Indication of which portions of the form are claimed as CBI;
20. List of attachments;
21. Assurances that the information is correct, EPA will be notified in writing if certain information were to change, and that registration will not be used in advertising to imply government approval;
22. Signature, date, printed name, title, phone number, fax number, and e-mail address of signer and contact person, if not the same.

Note that in item 21 above, the EPA would be notified in writing if certain information, listed in the regulations, were to change. This is accomplished via the instructions at:

<https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1011OSF.pdf>. It typically involves minor issues such as an additional name under which the additive will be sold or a small change in composition. This will be referred to later in this ICR as an “additive update.”

Additive manufacturers are also required to report annually the following information for each registered additive (40 CFR Part 79.5(b)):

1. Company name and company identification number;
2. Report year;
3. Type of report (original or resubmission);
4. Impurities, if greater than 0.1% by weight, to the extent known;
5. Any information known to the manufacturer and not previously reported on mechanisms of action, reactions with fuels, emission products, or emission effects;
6. Production (volume or weight) and market for the year for the additive(s);
7. Indication of which portions of the form are confidential;
8. Signature, date, printed name, title, phone, fax, e-mail;
9. Indication if a supplemental report is attached. (If one marks “Yes” for item 4 or 5, that indicates that a supplemental report is attached.)

Submit your Part 79 fuel additive registration, registration updates, or fuel and fuel additive report forms through the DC Fuels application in CDX, EPA's secure portal for parties to submit data to the Agency. This methodology has electronic versions of EPA Form 3520-13A, Fuel Additive Manufacturer Annual Report, and instructions, and, if reporting for more than 16 additives, EPA Form 3520-13B, Supplemental Additive Manufacturer Annual Report. Submission is via the instructions at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/epas-fuel-programs-mailing-addresses>.

Additive manufacturers who are merely relabeling a registered additive or blend of registered additives are not required to submit an annual report, since the information would be covered by the original manufacturer(s).

Fuel manufacturers are also required to report annually the following information for each registered gasoline and diesel fuel (40 CFR 79.5(a)(1)): (See EPA Form 3520-12Q, Fuel Manufacturer Quarterly Report for Motor Vehicle Gasoline or Diesel Fuel, and instructions, via the instructions at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/epas-fuel-programs-mailing-addresses>. Note, pending revision, a fuel manufacturer should submit the 3520-12Q only once for the calendar year but check only for the fourth quarter.)

1. Company name and identification number;
2. Address;
3. Fuel identification number;
4. Report year;
5. Annual production volume;
6. Quarter (4th only indicated since submitted annually);
7. Brand name of the fuel;

8. Range of concentration during the quarter for each additive previously reported for use in the fuel;
9. Indication of which items are confidential;
10. Signature, date, printed name, title, phone, fax, e-mail.

Fuel manufacturers are also required to report annually via a separate report the following information for each registered gasoline and diesel fuel (40 CFR 79.5(a)(2)): (See EPA Form 3520-12A, Fuel Manufacturer Annual Report for Motor Vehicle Gasoline or Diesel Fuel, and instructions, via the instructions at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/epas-fuel-programs-mailing-addresses>.)

1. Company name and identification number;
2. Address;
3. Fuel identification number;
4. Report year;
5. Brand names(s);
6. If not previously reported, information known by the manufacturer on mechanisms of action, reactions between additives and fuels, emission products, and emission effects;
7. Indication of which items are confidential;
8. Signature, date, printed name, title, phone, fax, and e-mail.

12c. Respondent Activities

The following respondent activities are required:

1. Read or hear the regulations at 40 CFR Part 79 and the instructions for each of the applicable forms;
2. Gather information from company files;
3. Review the information;
4. Enter information onto the forms and sign;
5. If indicated on the forms that additional information is attached, copy such information;
6. Transmit the information.

For the manufacturer of a fuel, there is a one-time registration for the fuel, and an on-occasion requirement to inform the Agency if the information provided for registration were to change. There are also two annual reports that a fuel manufacturer is required to submit for the registered fuel.

For the manufacturer of a fuel additive, there is a one-time registration for the additive, and an on-occasion requirement to inform the Agency if the information provided for registration were to change. There is also an annual report that the additive manufacturer is required to submit for the registered additive.

In order to submit information electronically, a manufacturer must (1) create a Central Data Exchange (CDX) Account with an Electronic Signature Agreement, and (2) associate the account to the manufacturer's company. This requires providing identification and contact information and attesting to

its validity. Guidance is at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/register-or-update-fuel-or-fuel-additive-request>. Fuel manufacturers are required to meet the two requirements per the registration requirements at 40 CFR 80 and 40 CFR 1090 and they are covered by the ICRs for those programs. Existing fuel additive manufacturers have met the two requirements already. Thus, the two requirements would only apply to a fuel additive manufacturer seeking registration for the first time.

12d. Respondent Burden Hours and Labor Costs

In discussions with fewer than 10 fuel and fuel additive manufacturers, four labor categories were identified as having involvement: managerial, legal, professional/technical (prof/tech), and clerical. According to the Bureau of Labor Statistics, May 2021 National Occupational Employment and Wage Estimates, mean wages were:

Wages

Managerial	\$59.31 per hour
Legal	\$54.38 per hour
Prof/Tech	\$44.10 per hour
Clerical	\$20.88 per hour

Doubling for company overhead and employing a 5% annual inflation factor to bring the rates to the year 2023, and, for convenience, rounding up to the nearest dollar, gives the follow rates that will be used in this ICR:

Total Employer Cost

Managerial	\$131 per hour
Legal	\$120 per hour
Prof/Tech	\$ 97 per hour
Clerical	\$ 46 per hour

The labor mix for the activities above will be about the same for each. It is estimated that for each hour of activity the mix will be about 0.05 hour managerial, 0.05 hour legal, 0.7 hour professional/technical, and 0.2 hour clerical. This gives an average labor cost of about \$90 per hour. However, due to continuing inflation it has been increased to \$100 per hour for this ICR. The burden estimates for each activity are the same as for the previous ICR except for replacement of the fuel manufacturer quarterly reports with an annual report. We believe that this consolidation will reduce the annual burden of twelve hours for the quarterly reports to ten hours for the new annual report. A fuel manufacturer registration will require eight hours on average to complete. Likewise, a fuel additive manufacturer registration will require eight hours to complete. The additive update, fuel update, and additive annual report each require one hour on average to complete. The fuel annual reports require three hours and ten hours on average to complete. The new requirement for a new additive manufacturer to setup a CDX account and associate it to the company is estimated at two hours.

Cost per Report

Fuel Registration - 8 hours @ \$100 = \$800

Fuel Update	- 1 hour @ \$100 = \$100
Additive CDX Account setup	- 2 hours @ \$100 = \$200
Fuel Additive Registration	- 8 hours @ \$100 = \$800
Additive Update	- 1 hour @ \$100 = \$100
Additive Manufacturer Annual Report	- 1 hour @ \$100 = \$100
Fuel Manufacturer Annual Report 1	- 3 hours @ \$100 = \$300
Fuel Manufacturer Annual Report 2	- 10 hours @ \$100 = \$1000

The following worksheet is based on an inventory of 1,000 registered fuels (up from 940 in the previous ICR) and 9,000 registered additives (up from 8,700 the previous ICR). Of the additives, about 3,500 are relabels or mixtures of registered additives, so only 9,000-3,500 = 5,500 additives will require annual reports. Recent data indicate that EPA is receiving approximately 50 new fuel registrations, 100 fuel updates, 200 new additive registrations, and 350 additive updates annually. For the previous ICR these values were 50, 100, 300, and 350 respectively. We estimate 20 CDX setups annually.

Worksheet 10: Annual Industry Burden

<u>Form</u>	<u>Number</u>	<u>Hours/Cost</u>	<u>Total Hours/Cost</u>
CDX setup	20	2.0/\$200	40/\$4,000
Additive			
Registration	200	8.0/\$800	1600/\$160,000
Additive Update	350	1.0/\$100	350/\$35,000
Additive Annual	5500	1.0/\$100	5500/\$550,000
Fuel Registration	50	8.0/\$800	400/\$40,000
Fuel Update	100	1.0/\$100	100/\$10,000
Fuel Annual 1	1000	3.0/\$300	3000/\$300,000
Fuel Annual 2 (Formerly Quarterly)	1000	10.0/\$1000	10000/\$1,000,000
Totals	8,220		20990/\$2,099,000

Thus, the net burden to industry is 20,990 hours and \$2,099,000, plus 8,220 submissions x \$25.00 each or \$205,500+\$2,099,000=\$2,304,500. (The net burden for the previous ICR was \$2,308,500.) The burden is gauged per form. Some manufacturers have hundreds of products, some have only one or two. Per section 6(c), the annual burden to the government is 2808 hours and \$582,000. It is recommended that the above costs be increased 7% annually for inflation.

Estimating the burden is straightforward. For the most part, the manufacturer is collecting and reporting information that is available in the normal conduct of business, such as product composition and production volume. Other information, such as health-effects data, must be reported only if they reside in the company files. No searching beyond company files is required. There are no recordkeeping requirements. There are no third-party activities.

13. RESPONDENT CAPITAL AND O&M COSTS

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.

Thus, there are no capital/start-up costs. The only operating and maintenance (O&M) cost is for the submission of the applications for registration and the annual reports. Instead of including this in each burden table, a cost of \$25.00 per submission will be included in the total burden estimate.

14. AGENCY COSTS

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.

14a. Agency Activities

The following agency activities are required:

1. Respond to inquiries on the reporting requirements;
2. Mail copies of the forms/instructions, regulations, list of all registered additives, list of registered gasoline detergent additives, list of registered diesel additives, and/or list of registered fuels upon request;
3. Review the forms and other submitted data;
4. Contact the manufacturer when the information has not been submitted in accordance with the regulations and discuss how the problem can be resolved;
5. Store the information in hard copy;
6. Enter the data submitted on the forms into the database.
7. Issue a letter to the manufacturer for each fuel and additive that is registered;
8. Administer a contract for the day-to-day operation of the registration program;
9. Maintain rigorous security for the protection of confidential business information;
10. Maintain a record of all confidential business information provided to the contractor;
11. Maintain computer hardware and software;
12. Provide general program oversight.

14b. Agency Labor Cost

The Agency activities listed above are handled primarily by contractor personnel for about \$250,000 per year. A part time Senior Environmental Employee (SEE) is employed at \$15,000 per year for data entry. Portions of the following EPA personnel are involved (doubled to include overhead):

GS-14 Environmental Engineer (EE)	- \$130K x 2.0=\$260K
GS-13 Chemical Engineer (CE)	- \$110K x 2.0=\$220K
GS-13 Program Analyst (PA),	- \$110K x 2.0=\$220K
GS-13 Computer Specialist (CS)	- \$110K x 2.0=\$220K

Worksheet 9: Annual Agency Burden in Full Time Equivalents (FTE's)

activity	EE	CE	PA	CS
respond to inquiries	0.1/\$26000	0.1/\$22000	0	0
mail info	by contractor			
review data	0.1/\$26000	0.2/\$44000	0	0
contact manu.	0	0.1/\$22000	0	0
store info	by contractor			
enter data	by contractor and Senior Environmental Employee			
issue letters	by contractor			
contract ad.	0.1/\$26000	0	0.2/\$44000	0
security	0	0	0.1/\$22000	0
record CBI	division clerical support			
maintain computer	by contractor			0.05/\$11000
program oversight	0.2/\$52000	0.1/\$22000	0	0
Totals	0.5/\$130000	0.5/\$110000	0.3/66000	0.05/\$11000
Total	1.35 FTE/\$317,000			

Total Annual Cost to the Government

Contract	\$250,000
Part time SEE	\$ 15,000
FTE's	<u>\$317,000</u>
Total	\$582,000

Thus, the annual estimated cost to the government is \$582,000 - \$317,000 in direct labor cost and \$265,000 in non-labor/contract costs.

15) REASONS FOR CHANGE IN BURDEN

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

While there has been a slight decrease in new registration activity, the conversion of the quarterly report for fuel manufacturers to an annual report has also resulted in a small decrease in the cost and hour burdens. The change from quarterly to annual reports is found in 40 CFR 79.5(a). The following worksheet summarizes the changes in burden hours:

Worksheet 11: Changes in Burden - Hours

<u>Form</u>	<u>Previous</u>	<u>Requested</u>	<u>Change</u>	<u>Reason</u>
CDX setup	0	40	+40	new requirement
additive registration	2400	1600	-800	adjustment
additive update	350	350	zero	
additive annual	5200	5500	+300	adjustment

fuel registration	400	400	zero	
fuel annual 1	2820	3000	+180	adjustment
fuel update	100	100	zero	
fuel annual 2	11,200	10000	-1200	adjustment/no longer quarterly
<u>Totals</u>	<u>22,550</u>	<u>20,990</u>	<u>-1,510</u>	

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.

The results of this collection of information are not published.

17) DISPLAY OF EXPIRATION DATE

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

EPA will display the expiration date for OMB approval of the information collection.

18) CERTIFICATION STATEMENT

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

There are no exceptions to the topics of the certification statement.

