**Table 1: Annual Respondent Burden and Cost – Air Emission Standards for Tanks, Su
CC, and 40 CFR Part 265, Subpart CC) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements [c]	4	1	4
B. Required activities	N/A		
C. Create information	N/A		
D. Gather existing information	1	1	1
E. Write report			
i. Annual project report [d]	1	1	1
ii. Final project report [d]	1	0	0
iii. Report required by 264.1080(f)(2)(viii)(F) [d]	1	0	0
iv. Semiannual report [e]	1	2	2
v. Report to EOA within 15 calendar days of waste determination exceedance [f]	1	2	2
vi. Notify EPA/WVDEP 60 days in advance for performance test of incinerator [d]	1	0	0
vii. Performance test results report for Sistersville Plant [d]	1	0	0
viii. Notification regarding hydrogen peroxide management [g]	1	1	1
ix. Notify RA 30 days in advance of any gap measurements to be taken [h]	1	1	1
x. Notify RA 30 days in advance of filling, or refilling tank [i]	1	1	1
Reporting Subtotal			
4. Recordkeeping requirements			
A. Recordkeeping for Sistersville, WV plant [j]			
i. Prepare and record documentation that air emission control present undue hazard	1	1	1
ii. Information going into annual report			
(1) Emission analysis	0.33	1	0.33
(2) Plant performance evaluation	0.33	1	0.33
(3) Description of anticipated problems	0.33	1	0.33

iii. Startup/shutdown plan	1	0	0
iv. Records of defect repair	0.5	2	1
v. Records of the inspection and repair of the closed-vent system	0.5	2	1
vi. Record dates and time that capper unit and condenser are operating	0.25	365	91.25
vii. Record amount of methanol generated and recovered; and condenser temperature	0.25	365	91.25
viii. Record of amount of methanol directed to reuse, recovery, thermal recovery/treatment and bio-treatment	0.25	365	91.25
B. Familiarize with regulatory requirements [c]	4	1	4
C. Plan activities [k]	16	1	16
D. Implement activities			
i. Waste determination for VO concentration at a point of origin			
(1) Waste determination once every 12 months	2	1	2
ii. Waste determination for treated hazardous waste			
(1) Waste determination for batch process once every 12 months	2	1	2
iii. Inspect and monitor each closed vent system [l]	0.08	365	29.2
iv. Write and implement an inspection plan and place in facility inspection plan	4	1	4
v. Inspect all coverings and monitor for initial detectable emissions, initial operation, using Method 21			
(1) Tanks	4	1	4
(2) Surface impoundments	5	1	5
(3) Containers	2	1	2
vi. Inspect all coverings and monitor for detectable emissions at least once every 6 months using Method 21			
(1) Tanks (includes Method 27- transportation vehicles)	4	2	8
(2) Surface impoundments	5	2	10
(3) Containers	2	2	4
vii. Owner/operator writes and implements plan with schedule to inspect unsafe covers	1	1	1
viii. Owner/operator writes and implements plan with schedule to inspect difficult to inspect covers	1	1	1
ix. Secondary seal inspection once a year	4	1	4
x. Primary seal inspection once every 5 years [m]	4	1	4

xi. General standards, record ID number of BIF, or incinerator used to treat waste	0.25	1	0.25
xii. Tanks and unsafe covers, record list of ID numbers for tanks with unsafe covers explain why it's unsafe and plan to inspect and monitor each cover	0.25	1	0.25
xiii. Tanks with difficult to inspect covers, record list of ID numbers, explain why difficult and plan to inspect and monitor each cover	0.3	1	0.3
E. Develop record system	16	1	16
F. Time to enter information			
i. Record each cover installed on a tank and certifies to its specifications	0.25	1	0.25
ii. Record each floating membrane installed on a surface impoundment and certifies to its Specifications	0.25	1	0.25
iii. Record each enclosure used to control air emissions and certifies to its specifications	0.25	1	0.25
iv. Records for each closed vent and control device it is designed to operate at the performance level for tank, surface impoundments, or container	0.25	1	0.25
v. Records all Method 27 tests performed by owner/operator for each container	0.5	1	0.5
vi. Records all visual inspections for each tank, surface impoundment and container, including covers	1	1	1
Tanks with air emission controls:			
vii. Records date of each attempts to repair leak, repair methods applied and date of successful repair	0.5	2	1
viii. Records all continuous monitoring	0.25	365	91.25
ix. Records management of carbon removed from a carbon absorption system	0.5	2	1
x. Records date and time of each sample	0.25	2	0.5
xi. Records results of each sample	0.25	2	0.5
xii. Records tank dimensions and design capacity	0.3	1	0.3
Tanks with alternative emission control (floating roofs):			
xiii. Records in the facility operating plan of the internal floating roof	0.25	1	0.25
xiv. Record the equipment design and certifies that it meet applicable requirements	0.25	1	0.25
xv. Record each inspection, the tank, date, and what components were inspected	0.25	2	0.5

(1) If defects found, identify the tank and describe the repairs that were made	0.25	2	0.5
xvi. Record in the facility operating plan the external floating roof	0.25	1	0.25
xvii. Record the equipment design and certifies that it meets applicable requirements	0.25	1	0.25
xviii. Record gap measurements of the tank, date of inspection, raw data and calculations	0.25	1	0.25
(1) If defects found, record the tank, date tank was emptied, or repairs make and the nature of repair	0.25	1	0.25
xix. Continuous monitoring inspections			
(1) Closed-vent systems	4	1	4
xx. Roof inspections/gap measurements:			
(1) Secondary seal inspection (once a year)	4	1	4
(2) Primary seal inspection (once every 5 years) [n]	4	0.2	0.8
G. Train personnel			
i. Waste determination methods	8	1	8
ii. Control equipment inspection and monitor	8	1	8
H. Audits	N/A		
Recordkeeping Subtotal			
Total Labor Burden and Costs (Rounded) [o]			
Total Capital and O&M Costs (Rounded) [o]			
Grand Total (Rounded) [o]			

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 6,7 of this ICR.

[b] This ICR uses the following labor rates: $163.17 per hour for Executive, Administrative, and Mana for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Stat Industry group." The rates are from column 1, "Total Compensation." The rates have been increased employed by private industry.

[c] We have assumed that all of the respondents will familiarize with the regulatory requirements each

[d] We have assumed that only the Sistersville, WV Plant XL Project will be reporting.

[e] We have assumed that 0.5 percent of respondents will report control devices malfunction, resulting Plant XL project (1) always reports semiannually for a total of 34 + 1 = 35 semiannual reports.

[f] We have assumed that 1 percent of waste determination will result in exceedance annually (1% x 6,

[g] We have assumed that only one facility currently uses the exemption regarding hydrogen peroxide

[h] We have assumed that 20 percent of the tank roofs will be inspected each year (external roof) (20%

[i] We have assumed that 10 percent of respondents will empty and refill a tank (internal floating roof)

[j] We assume recordkeeping only for the Sistersville, WV Plant XL Project.

[k] We have assumed that it will take each respondent sixteen hours once per year to plan activities.

[l] We have assumed that 50 percent of respondent will be required on a daily basis to inspect and mon

[m] We have assumed that 20 percent of respondents will take 4 hours once every five years to complet

[n] We have assumed that 20 percent of tanks with alternative emission controls (floating roofs) will ea
to complete the primary seal inspection. (20% x 6,760 = 1,352).

[o] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

rface Impoundment and Containers (40 CFR Part 264, Subpart

(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year ($) [b]
6,760	27,040	1,352	2,704	$3,921,056.88
6,760	6,760	338	676	$980,264.22
1	1	0.05	0.1	$145.01
1	0	0	0	$0
1	0	0	0	$0
35	70	3.5	7.0	$10,150.67
68	136	6.8	14	$19,721.29
1	0	0	0	$0
1	0	0	0	$0
1	1	0.05	0.1	$145.01
1,352	1,352	68	135	$196,052.84
676	676	34	68	$98,026.42
	41,441			***$5,225,562***
1	1	0.05	0.1	$145.01
1	0.33	0.02	0.03	$47.85
1	0.33	0.02	0.03	$47.85
1	0.33	0.02	0.03	$47.85

Labor Rates	
Managerial	$163.17
Technical	$130.28
Clerical	$65.71

1	0	0	0	$0
1	1	0.05	0.1	$145.01
1	1	0.05	0.1	$145.01
1	91	4.6	9.1	$13,232.12
1	91	4.6	9.1	$13,232.12
1	91	4.6	9.1	$13,232.12
6,760	27,040	1,352	2,704	$3,921,056.88
6,760	108,160	5,408	10,816	$15,684,227.52
6,760	13,520	676	1,352	$1,960,528.44
6,760	13,520	676	1,352	$1,960,528.44
3,380	98,696	4,935	9,870	$14,311,857.61
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
6,760	54,080	2,704	5,408	$7,842,113.76
119	1,190	60	119	$172,561.31
6,760	27,040	1,352	2,704	$3,921,056.88
0	0	0	0	$0
0	0	0	0	$0
6,760	27,040	1,352	2,704	$3,921,056.88
1,352	5,408	270	541	$784,211.38

0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
6,760	3,380	169	338	$490,132.11
6,760	6,760	338	676	$980,264.22
6,760	6,760	338	676	$980,264.22
676	61,685	3,084	6,169	$8,944,911.01
3,380	3,380	169	338	$490,132.11
6,760	3,380	169	338	$490,132.11
6,760	3,380	169	338	$490,132.11
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
6,760	3,380	169	338	$490,132.11

6,760	3,380	169	338	$490,132.11
0	0	0	0	$0
0	0	0	0	$0
6,760	1,690	85	169	$245,066.06
6,760	1,690	85	169	$245,066.06
6,760	27,040	1,352	2,704	$3,921,056.88
6,760	27,040	1,352	2,704	$3,921,056.88
1,352	1,082	54	108	$156,842.28
6,760	54,080	2,704	5,408	$7,842,113.76
6,760	54,080	2,704	5,408	$7,842,113.76
	733,882			***$92,539,022***
	775,000			**$97,800,000**
				$13,500,000
				$111,000,000

hours/response

114

760. There will be no new additional sources during the three year period

gerial labor; $130.28 per hour for Technical labor, and $65.71 per hour
istics, March 2023, “Table 2. Civilian Workers, by Occupational and
by 110 percent to account for the benefit packages available to those

year.

in exceedance annually (0.5% x 6,760 = 34), along with the Sistersville

760 = 67.6, rounded to 68).

management located at 40 CFR 264.1080(d) and 40 CFR 265.1080(d).

x 6,760 = 1,352).

(10% x 6,760 = 676).

ıitor each closed vent system (50% x 6,760 = 3,380).

te the primary seal inspection. (20% x 6,760 = 1,352).

ıch take 4 hours 0.2 times per year, which equates to once every 5 years,

Table 2: Average Annual EPA Burden and Cost – Air Emission Standards for Tanks, Surfa (40 CFR Part 264, Subpart CC, and 40 CFR Part 265, Subpart CC) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)
A. Review report					
1. Waste exceedance reports [c]	4	1	4	68	272
2. Control device exceedance reports [d]	4	2	8	35	280
3. Notification reports [e]	1	1	1	2,029	2,029
4. Annual project report [f]	4	1	4	1	4
B. Review Records					
1. Select site and review permit [g]	8	1	8	520	4,160
TOTAL (Rounded) [h]					

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 6,760. during the next three years of this ICR.

[b] The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to ac Managerial rates of $73.46 (GS-13, Step 5, $45.91 × 1.6), Technical rate of $54.51 (GS-12, Step 1, $34.07 Step 3, $18.44 × 1.6). These rates are from the Office of Personnel Management (OPM), 2023 General Sc pay.

[c] Annual responses assume 1 percent of waste determination results in an exceedance (1% x 6,760 = 67.6.

[d] Semiannual responses assumes 0.5% of control devices malfunction resulting in an exceedance (0.5% x Plant. (34 + 1 = 35)

[e] We have assumed that 10 percent of internal floating roof respondents (10% x 6,760 = 676), plus 20% o = 1,352), and one facility using hydrogen peroxide exemption (676 + 1,352 + 1 = 2,029) will submit notifi

[f] We have assumed that the Sisterville Plant will submit an annual project report.

[g] We have assumed that it will take respondents 8 hours once per year to review selected sites and review

[h] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ce Impoundment and Containers

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year ($) [b]
14	27	$16,628.18
14	28	$17,117.24
101	203	$124,038.86
0.2	0.4	$244.53
208	416	$254,313.28
7,760		**$412,000**

Labor Rates	
Managerial	$73.46
Technical	$54.51
Clerical	$29.50

There will be no new additional sources

count for government overhead expenses.
' × 1.6), and Clerical rate of $29.50 (GS-6,
chedule, which excludes locality, rates of

. rounded to 68).

6,760 = 34) plus the Sistersville, WV

f external roof respondents (20% x 6,760
ication reports.

permit records.

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Organic emission control equipment	$0	$0	$0	$2,000	6,760
Total			$0		

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due t

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
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	Number of Respondents (E=A+B+C-D)
1	0	2,132	4,628	0	6,760
2	0	2,132	4,628	0	6,760
3	0	2,132	4,628	0	6,760
Average	0	2,132	4,628	0	6,760

(G)	
Total O&M, (E x F)	
$13,520,000	
$13,500,000	

o rounding.

Total Annual Responses			
(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Notification report for internal and external floating roof	2,028	1	0
Notification of hydrogen peroxide management exemption	1	1	0
Semiannual report	35	2	0
Annual exceedance report	68	1	0
Annual Sisterville Plant project report	1	1	0
Recordkeeping requirements	0	0	4,628
Total			

Note: The Sisterville Plant is counted twice in the # of Respondents column.

(E)
Total Annual Responses E=(BxC)+D
2,028
1
70
68
1
4,628
6,796