

Summary			
Type of Respondent	Total Responses per Year	Total Hours per Year	Total Cost per Year (Labor and Non-Labor)
I-Biogas Producers	25,723	44,203	\$7,134,724
II-RNG Producers	38,590	78,737	\$12,741,553
III-RNG Importers	23,244	13,690	\$2,017,445
IV-SFW	1,101	4,331	\$510,485
V-Biogas Closed Distribution System RIN Generators	3,083	3,709	\$470,810
VI-QAP Providers	81	1,057	\$187,795
VII-RNG RIN separators	11,569	5,705	\$1,238,251
VIII-Third Parties	2	0	\$0
IX-Producers of Renewable Fuel from Biogas used as biointermediate or RNG used as feedstock	846	1,246	\$226,780
GRAND TOTAL	104,239	152,678	\$24,527,843

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.

TOTAL NUMBER of Respondents:
11,057
Non-Labor Costs* Only:
\$10,724,875
\$ 10,699,875.00

*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	115.00	10.00	1.00	10.00	10.00	1150.00	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	115.00	10.00	1.00	10.00	10.00	1150.00	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	1380.00	10.00	1.00	10.00	120.00	13800.00	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	4600.00	10.00	1.00	10.00	160.00	46000.00	OTAQREG; assumes 48 hours, divided by 3, to annualize for ICR. All purchased services.	\$ 46,000.00
\$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	57.50	20.00	1.00	1.00	0.50	57.50	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	57.50	329.00	12.00	3948.00	1974.00	227010.00	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	115.00	329.00	4.00	1316.00	1316.00	151340.00	quarterly RFS0107, RFS1700, 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	920.00	329.00	1.00	329.00	2632.00	302680.00	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	115.00	329.00	12.00	3948.00	3948.00	454020.00	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	466.60	329.00	12.00	3948.00	16186.80	1842136.80	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	115.00	329.00	12.00	3948.00	3948.00	454020.00	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	287.50	329.00	12.00	3948.00	3948.00	1,135,050.00	Estimate assumes a monthly frequency. Assumes all purchased services.	\$ 1,135,050.00
\$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	460.00	20.00	1.00	20.00	80.00	9200.00	CBP	0.00
\$80.105, 80.165 and 80.1464; 1090.1800	Reporting: Attest Engagements (annual)	0.00	0.00	24.00	6900.00	329.00	1.00	329.00	7896.00	2,270,100.00	Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements	\$ 2,270,100.00
\$80.105, 80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	57.50	329.00	12.00	3948.00	1974.00	227,010.00	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						3,041		25,723	44,203	7,134,724.30		\$ 3,451,150.00

Reporting	5,654	11,567	\$ 2,719,808	\$ 2,316,100	90.0400419858
Recordkeeping	20,069	32,637	\$ 4,414,917	\$ 1,135,050	44.1258795630
				8.458730680697140	

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 I - BIOGAS PRODUCERS: RFS0107, RFS1700, RFS4000, RFS4100, RFS5100

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											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; set up initial system accounts with EPA	1.00	0.00	0.00	115	10	1	10	10	1,150		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	115	10	1	10	10	1,150	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	1,380	10	1	10	90	13,800	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	1,380	482	1	482	5,784	665,160	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	38	482	12	5,784	1,909	219,503	monthly RFS4900	0.00	
\$80.110, 80.140, 80.1451, 80.1452	Reporting: EMTS (RIN generation/transactional reporting)	0.50	0.00	0.00	58	482	12	5,784	2,892	332,580	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	115	482	4	1,928	1,928	221,720	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	920	482	1	482	3,856	443,440	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	460	482	12	5,784	23,136	2,660,640	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	3,565	482	1	482	6,266	1,743,330	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate.	\$ 1,718,330.00	\$ 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	173	482	12	5,784	8,676	997,740	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	115	482	12	5,784	5,784	665,160	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	460	20	1	20	80	9,200	CBP	0.00
\$80.165 and 80.1464	Reporting: Attest Engagements (annual)	0.00	0.00	32.00	9,200	482	1	482	15,424	4,434,400	Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements	\$ 4,434,400.00
\$80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	58	482	12	5,784	2,892	332,580	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						5,352		38,590	78,737	12,741,553		\$ 6,177,730.00

Reporting	14,510	28,127	\$ 5,898,663	\$ 4,434,400	114.9105986007
Recordkeeping	24,100	50,610	\$ 6,842,890	\$ 1,743,330	45.1756931848
					7.210388639760840

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.											
Information Collection Activity		Hours and Cost					Total Hours and Cost				Forms & Notes
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 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	115	10	1	10	10	1,150	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	1.00	0.00	0.00	115	10	1	10	10	1,150	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: Update registration as needed to reflect changes in information and changes needed due to new regulation.	12.00	0.00	0.00	1,380	10	1	10	90	13,800	New registrants: OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR. 0.00
\$80.110, 80.135, 80.1450, subpart I	Reporting: EMTS (RIN generation/transactional reporting)	1.00	0.00	0.00	253	263	12	3,156	3,156	798,468	Existing registrants: OTAQREG 0.00
\$80.80.110, 80.140, 80.1452	Reporting: RNG importer who generates RINs for foreign producer	0.50	0.00	0.00	58	2	4	8	4	460	Assumes one EMTS report per month; EMTS quarterly RFS0107 0.00
\$80.110, 80.145, 80.1454	Recordkeeping: Internal systems updates	8.00	0.00	0.00	920	2	1	2	16	1,840	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.	1.00	0.00	0.00	115	263	12	3,156	3,156	362,940	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 L, as applicable	Recordkeeping: PTD requirements	0.05	0.00	0.00	6	263	52	13,676	684	78,637	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	230	263	12	3,156	6,312	725,880	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	460	2	12	24	96	11,040	Assumes one instance per month. \$ 11,040.00
\$80.110, 80.165 and 80.1464	Reporting: Attest Engagements (annual)	0.00	0.00	12.00	3,450	2	1	2	24	6,900	Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements \$ 6,900.00
\$80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP	0.50	0.00	0.00	58	2	12	24	12	1,380	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						1,102		23,244	13,690	2,017,445	\$ 17,940.00
						Responses		HRS		Total Costs	
						Reporting		3,206	3,414	\$ 835,728	\$ 6,900
						Recordkeeping		20,038	10,276	\$ 1,181,717	\$ 11,040
						responses per respondent		21.092538983666100			
										Non-Labor Costs	
										Non-Labor \$/response	
										0.2968508002	
										0.4749612803	

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>

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 FORMS & INSTRUCTIONS ON TAB III - BIOGAS IMPORTERS: RFS0107

Annual Respondent Burden and Cost by Type of Party													
Table IV - Parties who Use Alternative Recorkdeeping for SFW: RF Producer or Biointermediate Producer who producers 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	460	5	1	5	20	2300	OTAQREG	0	
80.1471(f), 80.1479	Recordkeeping: RF Producer or Bioint Producer QAP; reports submitted by QAP provider, see Tab VI; recorkdeeping only	0.00	0.00	2.00	575	35	1	35	70	20125	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.	20125.00	
80.1454, 80.1479	Recordkeeping: feedstock aggregator to keep records for collection	4.00	0.00	0.00	460	40	1	40	160	18400	CBP	0	
80.1453, 80.1479	Recordkeeping: PTD use	4.00	0.00	0.00	460	85	12	1020	4080	469200	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	460	40	1	1	1	460	CBP; assumes 12 hour one-time burden divided by 3 years to annualize	0	
GRAND TOTAL						205		1,101	4,331	510,485		\$ 20,125.00	
						Responses		HRS		Total Costs		Non-Labor Costs	Non-Labor \$/response
						Reporting		5	20	\$ 2,300		\$ -	0.000000000
						Recordkeeping		1,096	4,311	\$ 508,185		\$ 20,125	18.2788374205
						responses per respondent					5.370731707317070		

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: none

(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 30 existing plus 5 new; 35 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	115	5	1	5	5	575	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	115	4	1	4	9	460	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	115	4	1	4	4	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	58	35	12	420	210	24,150	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	58	35	12	420	210	24,150	monthly RFS5100	0
\$80.110, 80.140, 80.1451, 80.1452	Reporting: EMTS (RIN generation/transactional reporting)	1.00	0.00	0.00	115	35	12	420	420	48,300	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	920	35	1	35	280	32,200	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	460	35	12	420	1680	193,200	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 \$80.150	Recordkeeping: PTD requirements	0.05	0.00	0.00	6	35	12	420	21	2,415	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	58	35	12	420	210	24,150	Assumes one batch per month and a somewhat automated process.	0

\$80.110, 80.165, and 80.1464	Reporting: Attest Engagements (annual)										Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements	120,750
		0.00	0.00	12.00	3450	35	1	35	420	120,750		
\$80.110, 80.170, 80.1469 et seq.	Recordkeeping: related to participation in QAP										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
		0.50	0.00	0.00	58	40	12	480	240	0.00		
GRAND TOTAL						333		3,083	3,709	470,810		120,750

		Responses	HRS	Total Costs	Non-Labor Cost	Non-Labor \$/response
	Reporting		1,308	1,278 \$ 218,845	\$ 120,750	39.1663963672
	Recordkeeping		1,775	2,431 \$ 251,965	\$ -	0.0000000000
		responses per respondent		9.258258258258260		

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: RF50107, RF5000, RF50100	
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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												
\$80.135	Registration: initial or update to registration steps	1	0	0	115	1	1	1	1	115	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	1,150	4	4	16	160	18,400	quarterly RFS2000	0
\$80.170, 80.1451	Reporting: Aggregate RIN Verification (4x/year)	5.00	0.00	0.00	575	4	4	16	80	9,200	quarterly RFS2100	0
\$ 80.170, 80.1451(g)	Reporting: On-Site Audit Report (4x/year)	10.00	0.00	0.00	1,150	4	4	16	160	18,400	quarterly RFS2200	0
\$80.170, 80.1451(g)	Reporting: Mass Balance	15.00	0.00	24.00	8,625	4	4	16	624	138,000	quarterly RFS2400	0
\$80.170, 80.185, 80.1474	Reporting: Potentially Invalid RINs (4x/year)	2.00	0.00	0.00	230	4	4	16	32	3,680	quarterly RFS2300	0
GRAND TOTAL						21		81	1,057	187,795		0
						Responses		HRS	Total Costs	Non-Labor CostNon-Labor \$/response		
						Reporting		81	1,057 \$	187,795	\$ -	0.0000000000
						Recordkeeping						
						responses per respondent				3.857142857142860		

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: RFS2000, RFS2100, RFS2200, RFS2300, RFS2400

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	115
§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	115
§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	230
80.140, 80.1451, 80.1452	Reporting of RIN separations in EMTS	1	0	0	115
§80.140, 80.1451, 1452	Reporting: quarterly reporting by separators under 80.140, as applicable	1	0	0	115
§80.140, 80.1451, 1452	Reporting: monthly reporting by separators under 80.140	0.5	0	0	57.5
§80.140, 80.1451, 1452	Reporting: monthly reporting by separators under 80.140	0.5	0	0	57.5
§80.115, 80.145, 80.1454	Recordkeeping: Internal systems updates	8	0	0	920
§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	287.5
§80.115, 80.150 and §80.1453 or 40 CFR part 1090, subpart L, as applicable	Recordkeeping: PTD requirements	0.05	0	0	5.75

\$80.115, 80.165 and 80.1464	Reporting: Attest Engagements (annual)	0	0	12	3450
GRAND TOTAL					

Reporting

Recordkeeping

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-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	
5	1	5	5	575	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.
5	1	5	5	575	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR.
5	1	5	90	1150	New registrants; OTAQREG; assumes 6 hours, divided by 3, to annualize for ICR.
109	12	1308	90	150420	EMTS
109	4	436	436	50140	quarterly RFS0107
109	12	1308	654	75210	monthly RFS5200
109	12	1308	654	75210	monthly RFS5300
109	1	109	872	100280	One time burden; 24 hours divided by 3 years to annualize
109	12	1308	1308	376050	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate. Assumes all purchased services.
109	52	5668	283.4	32591	Assumes weekly frequency and a somewhat automated process; PTDs are CBP.

109	1	109	1308	376,050.00	Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements
887		11,569	5,705	1,238,251	
		Responses	HRS	Total Costs	
		4,484	3,242	\$ 729,330	
		7,085	2,463	\$ 508,921	
responses per respondent					13.042841037204100

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

[el-central-data-exchange-cdx](#)
[d-transaction-system-emts](#)
[st-engagements](#)

Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
0
0
0
0
0
0
0
0
0
\$ 376,050.00
0

\$376,050.00
752,100.00

Non-Labor Costs		Non-Labor \$/response
\$	376,050	32.5049701789
\$	376,050	32.5049701789

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

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					

Reporting
Recordkeeping

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-otaq>

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

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

Cost by Type of Party						
submit reports. Assumes 5 new of each. Reports appear on individual respondents' tabs.						
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		Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
1	1	1	0	0	OTAQ REG USER GUIDE	0
1	1	1	0	0	OTAQ REG USER GUIDE	0
2		2	0	0		0
		Responses	HRS	Total Costs	Non-Labor Cost	
		2	-	\$ -		\$ -
responses per respondent					1.0000000000000000	

on to regulated parties as purchased services.

0725, 2060-0731, 2060-0740.

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

[dcfuel-central-data-exchange-cdx](#)
[rated-transaction-system-emts](#)
[-attest-engagements](#)

ondents for whom services are performed.

Non-Labor \$/response

0.0000000000

Table IX - Producers of RF from Biogas used as Biointermediate or RNG used as a feedstock - see 80.120; assumes 1

Information Collection Activity		Hours and Cost				Total	
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	115	2	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	115	2	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	1,380	2	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	1,380	12	1
80.120, 80.140, 80.1451, 80.1452	Reporting: RIN retirements in EMTS.	1.00	0.00	0.00	115	12	12
80.120, 80.140, 80.1451, 80.1452	Reporting: RIN activity report, as applicable	0.50	0.00	0.00	58	12	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	58	12	4
80.120, 80.145, 80.1454	Recordkeeping: create and retain records	1.00	0.00	0.00	115	12	12
80.120, 80.145, 80.1453	Recordkeeping: PTD requirements	0.50	0.00	0.00	58	12	12
80.120(f), 80.155	Recordkeeping: perform and retain continuous measurements	0.00	0.00	1.00	288	12	12

80.120, 80.165, 80.1464, 40 CFR 1090.1800, 1090,1805	Reporting: Attest Engagements (annual)	0.00	0.00	32.00	9,200	12	1
80.120, 80.170	Recordkeeping: QAP	0.50	0.00	0.00	58	12	12
GRAND TOTAL						114	

Reporting		
Recordkeeping		

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-otaqdcfuel>

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

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

LIST OF NEW OR UPDATED FORMS & INSTRUCTIONS ON TAB IX - PRODUCERS OF RF BIOGAS..	RFS0107, RFS5400
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y				
0 new respondents registering new pathways under 2060-0725.				
Hours and Cost			Forms & Notes	
Total Number of Responses per Year	Total Hours/Year	Total Cost/Year		Non-Labor Only Portion of Column K (Capital, O&M and Purchased Services)
2	2	230	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00
2	2	230	New registrants; OTAQREG; assumes 3 hours, divided by 3, to annualize for ICR. 75 domestic plus 20 foreign	0.00
2	90	2,760	New registrants; OTAQREG; assumes 36 hours, divided by 3, to annualize for ICR.	0.00
12	144	16,560	OTAQREG	0.00
144	144	16,560	EMTS	0.00
48	24	2,760	quarterly RFS0107	0.00
48	24	2,760	quarterly RFS5400	0.00
144	144	16,560	CBP	0.00
144	72	8,280	CBP	0.00
144	144	41,400	Estimate assumes a monthly frequency to keep records, for R&R, considers continuous monitoring in developing estimate. Assumes all purchased services.	41400.00

12	384	110,400	Within system. Follow directions at https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements	\$ 110,400.00
144	72	8,280	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.	8280.00
846	1,246	226,780		\$ 160,080.00

Responses	HRS	Total Costs	Non-Labor Costs	Non-Labor \$/response
270	814	\$ 152,260	\$ 110,400	130.4964539007
576	432	\$ 74,520	\$ 49,680	58.7234042553
responses per respondent		7.421052631578950		

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

l-central-data-exchange-cdx
 l-transaction-system-emts
 t-engagements

Labor Costs				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour^a</i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial (CEO - 11-1011)	236.00	472.00	0.05	23.6
Professional/Technical (Refinery Operators - 51-8093)	47	94.00	0.7	65.80
Clerical (Secretaries and Administrative Assistants 43-6010)	33	66.00	0.2	13.20
Legal (Lawyer 23-1011)	122	244.00	0.05	12.2
Total Employer Cost/hour				115.00
Purchased Services ^b				287.50

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

^b 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 NAICS
US Bureau of Labor Statistics

See: https://www.bls.gov/oes/current/naics3_324000.htm (accessed May 2, 2022).

For each labor category, mean hourly wage was selected.

Employer

§ 324000 - Petroleum and Coal Products Manufacturing”