SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG and GGGa) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG and GGGa) (Renewal**),** EPA ICR Number 0983.12, OMB Control Number 2060-0067

1(b) Short Characterization/Abstract

This information collection request (ICR) is for the New Source Performance Standards (NSPS) for Equipment Leaks of VOC (Volatile Organic Compounds) in Petroleum Refineries (40 CFR part 60, subparts GGG and GGGa). The NSPS in subpart GGG were proposed on January 4, 1983, and promulgated on May 30, 1984. These standards apply to the following facilities in petroleum refineries: compressors and the group of all equipment (e.g., valves, pumps, flanges, etc.) within a process unit in VOC service, commencing construction, modification or reconstruction after the date of proposal. Amendments that would have added new standards and compliance requirements to subpart GGG were proposed on November 7, 2006. In response to public comments, all new requirements are being incorporated in a new subpart GGGa that applies to sources that commence construction, reconstruction, or modification after November 7, 2006. The final amendments to subpart GGG involve only clarifications and additional compliance options.

Owners or operators of the affected facilities described must make one-time-only notifications. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Monitoring requirements specific to the NSPS for equipment leaks of VOC in petroleum refineries provide information on which components are leaking VOCs. NSPS Subpart GGG references the compliance requirements of NSPS subpart VV, and NSPS subpart GGGa references the compliance requirements of NSPS subpart VVa. Periodically, owners or operators are required to record information identifying leaking equipment, repair methods used to stop the leaks, and the dates of repair. The time period varies depending on equipment type and leak history. Semiannual reports are required to measure compliance with the standards of NSPS Subparts VV and VVa, as referenced by NSPS subparts GGG and GGGa. These notifications, reports, and records are essential in determining compliance and in general, are required, of all sources subject to NSPS. Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records.

The Environmental Protection Agency's (EPA's) databases show that approximately 130 refineries are currently subject to subpart GGG. This number is not expected to change over the next three years. In addition, it is assumed that 30 of the 135 refineries are also subject to NSPS

subpart GGGa. For analysis purposes, the burden is calculated for each subpart separately and then combined. The combined total number of burden hours is 24,525. The combined total annual labor cost is $2,319,816. There are no capital/startup or Operation and Maintenance (O&M) costs associated with this ICR.

The burden to the "Affected Public" (i.e., major source petroleum refineries) can be found in both Table 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal), and Table 1b: Annual Respondent Burden and Cost- NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal). The burden to the "Federal government" is attributed entirely to work performed by Federal employees or government contractors. The burden to the Federal government can be found below in Table 2a: Annual Burden and Cost to the Federal/State Government - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal**),** and Table 2b: Annual Burden and Cost to the Federal/State Government - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal).

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

The number of information collections has been reduced from two to one as shown in ICRAS (Information Collection Request, Review and Submission) under ICR Number 0983.12, Paperwork Reduction Act Submission Worksheet(s), Part 2: IC Details. The previous ICR used an individual worksheet for each subpart (GGG and GGGa). However, the "Affected Public" is the same for both subparts and only one worksheet is indicated. Therefore, the two worksheets have been combined.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act, as amended, to establish standards of performance for new stationary sources that reflect:

> . . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any nonair quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated [Section 111(a)(l)].

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

> (A) establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment and use such audit procedures, or methods; (D) sample such emissions (in accordance with such methods at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, VOC emissions from Equipment Leaks of VOC in Petroleum Refineries cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category at 40 CFR part 60, subparts GGG and GGGa.

2(b) Practical Utility/Users of the Data

The control of emissions of VOC from equipment leaks in petroleum refineries requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOC from equipment leaks in petroleum refineries are the result of operation of the compressors and the group of all equipment (e.g., valves, pumps, flanges, etc.) within a process unit in VOC service. These standards rely on the prevention of VOC emissions through work practices, such as proper leak detection and timely repair. The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to these standards. The reviewing authority may then inspect the source to check if the leaks are being detected and repaired and the standard is being met.

Performance test reports are needed, as these are the Agency's record of a source's initial capability to comply with the emission standard and serve as a record of the operating conditions under which compliance was achieved. NSPS Subpart GGG references NSPS Subpart VV for compliance, and NSPS Subpart GGGa references NSPS Subpart VVa for compliance. Monthly monitoring of compressors and equipment in VOC service under NSPS Subpart GGG shall take place as specified in NSPS Subpart VV §60.485(b). For valves, if no leaks are detected for two successive months, monitoring may be performed once per quarter (see §60.482-7(c)). If a leak is detected, the equipment shall be monitored monthly until a leak is not detected for two successive months. Also, leak location shall be recorded in a log, and this information shall be kept available for two years. Leaks shall be repaired within 15 days and the date of successful repair shall be recorded in the log. Additionally, an owner or operator may use specified equipment eliminating the need for monitoring, or seek approval of alternative emission limitations under other various sections of 40 CFR part 60, subpart VV or VVa.

Semiannual reports shall be submitted itemizing the information for each month. Notifications are used to inform the Agency or delegated authority when a source becomes subject to a standard. The reviewing authority may then inspect the source to check if the standard is being met. The semiannual reports are used for problem identification, as a check on source operations and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is

used by the Agency to ensure that facilities affected by the NSPS continue to identify and repair leaking equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The additional records required by subpart GGGa have been identified as additional information needed by Agency inspectors to ensure compliance. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Non-duplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR part 60, subpart GGG and subpart GGGa.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

During development of the standard and the amendments in 2006, EPA held meetings and conference calls in which representatives of petroleum refining companies and their trade associations (National Petroleum Refiners Association and American Petroleum Institute) were provided an opportunity to comment on the burden associated with the proposed amendments.

We also reviewed our internal data sources such as the Air Facility System (AFS). In the past, we have discussed the industry growth rate with the EPA Office of Air Quality Planning and Standards (OAQPS) and Norbert Dee of the National Petrochemical and Refiners Association in Washington, D.C., (202) 457-0480.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the required standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of the reporting or recordkeeping requirements contained in 40 CFR part 60, subpart GGG or GGGa, or otherwise pertinent to this request, violate any of the regulations established by OMB in 5 CFR 1320.6.

3(f) Confidentiality

The required information consists of emissions data and other information that have been determined not to be private. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contained in 40 CFR part 60, subpart GGG or GGGa, or otherwise pertinent to this request, contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are petroleum refineries where the affected compressors or group of equipment within a process unit commenced construction, modification, or reconstruction after January 4, 1983. The SIC code for the respondents affected by the standards is the United States Standard Industrial Classification (SIC) Code 2911, which corresponds to the North American Industry Classification System (NAICS) Code 324110 for petroleum refineries where the affected compressors or group of equipment within a process unit commenced construction, modification, or reconstruction after January 4, 1983.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 60, subpart GGG or subpart GGGa. These requirements are summarized in the following tables.

A source must make the following notifications and reports:

Notifications for 40 CFR Part 60, Subparts GGG and GGGa	**Citation for subpart GGG**	**Citation for subpart GGGa**
Construction/reconstruction	60.7(a)(1)	60.7(a)(1)
Anticipated startup	60.7(a)(2)	60.7(a)(2)
Actual startup	60.7(a)(3)	60.7(a)(3)
Physical or operational change	60.7(a)(4)	60.7(a)(4)
Initial performance test	60.8(d)	60.8(d)
Alternative standard selected	60.487(d)	60.487a(d)

Reports for 40 CFR Part 60, Subparts GGG and GGGa	**Citation for subpart GGG**	**Citation for subpart GGGa**
Initial performance test results	60.8(a)	60.8(a)
Comply with the provisions of 60.487	60.592(e)	60.592a(e)
Semiannual reports	60.486, 60.487(a) through (c)	60.486a, 60.487a(a) through (c)
Performance test	60.8, 60.487(e)	60.8, 60.487a(e)

A source must keep the following records:

Recordkeeping for 40 CFR Part 60, Subparts GGG and GGGa	**Citation for subpart GGG**	**Citation for subpart GGGa**
All measurements, monitoring device, and performance testing measurements	60.7(e)	60.7(e)
Comply with the provisions of 60.486 or 60.486a	60.592(e)	60.592a(e)
The date and instrument reading of each monitored component must be recorded	N/A	60.486a(a)
Each detected leak shall be recorded in a log and kept for 2 years	60.486(c)	60.486a(c)
Information pertaining to design requirements or closed vent systems and control devices	60.486(d)	60.486a(d)
Equipment identification numbers and designations, and dates of performance tests	60.486(e)	60.486(e)(1) through (5)
Dates and results of weekly visual inspections	N/A	60.486a(e)(6)
Information related to instrument calibrations and drift checks	N/A	60.486a(e)(7)
Information pertaining to valves and pumps that are designated as unsafe to monitor or difficult to monitor	60.486(f)	60.486a(f)

Recordkeeping for 40 CFR Part 60, Subparts GGG and GGGa	Citation for subpart GGG	Citation for subpart GGGa
Information pertaining to valves complying with alternative compliance requirements	60.486(g)	60.486a(g)
Design criteria and any changes	60.486(h)	60.486a(h)
Records for use in determining exemptions	60.486(i)	60.486a(i)
Information and data to demonstrate that a piece of equipment is not in VOC service	60.486(j)	60.486a(j)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. At this time, it is estimated that approximately 30 percent of the respondents use electronic reporting.

ii. Respondent Activities

The respondent activities required by 40 CFR part 60, subparts GGG and GGGa are identified in the following table:

Respondent Activities
Read instructions
Perform initial performance test as per 40 CFR 60.485, Reference Method 21 and 22 tests, and repeat performance tests
Write the notifications and reports listed above
Enter information required to be recorded above
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information
Adjust the existing ways to comply with any previously applicable instructions and requirements
Train personnel to be able to respond to a collection of information
Transmit or otherwise disclose the information

As refiners replace/upgrade their monitoring equipment, they may choose to use systems that automatically log the results of monitoring which can be downloaded into a computer database. This database can be used to develop the required reports.

5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the information required under 40 CFR part 60, subparts GGG and GGGa:

Agency Activities
Observe initial performance tests and repeat performance tests if necessary
Review notifications and reports, including performance test reports, and other reports, required to be submitted by industry
Audit facility records
Input, analyze, and maintain data in the Air Facility System

5(b) Collection Methodology and Management

The required data and reports can be evaluated onsite by conducting a partial compliance evaluation, full compliance evaluation or inspection, or through offsite review of compliance monitoring records and reports. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the Air Facility System (AFS), which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance data for over 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, the EPA regional offices, and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve, and analyze the data. The records required by this regulation must be retained by the owner or operator for two years.

5(c) Small Entity Flexibility

A majority of the affected facilities are large businesses. However, the impact on small businesses was taken into consideration during development of the regulation. The number of small entities is estimated to be five. Due to technical considerations involving the process operations and leak detection and repair programs, the recordkeeping and reporting requirements are the same for both small and large businesses. The Agency considers these requirements to be the minimum needed to ensure compliance and, therefore, cannot reduce them further for small

businesses. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

For sources that install "leakless" components, monitoring may not be required for those components. Monitoring and recordkeeping may be reduced for sources that maintain low percentages of leaking components. In addition, alternative means of emission limitation are allowed after proper demonstration of their effectiveness to the Administrator.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in both Table 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal), and Table 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGGa) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b show the burden for the recordkeeping and reporting requirements applicable to the industry for the subparts included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory. The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

6(a) Estimating Respondent Burden

Although monitoring of the various components may be required on a weekly, monthly, quarterly, semiannual or annual basis, given the number of components that must be monitored at any facility, monitoring overall is essentially occurring daily. Therefore, it is assumed that the average recordkeeping time for each day's worth of monitoring for both subpart GGG and subpart GGGa is 0.30 hours and that monitoring is done 365 days a year. An additional 0.10 hours per day are estimated for a typical refinery to complete the new recordkeeping tasks required by subpart GGGa. These tasks include: collecting and maintaining records of all instrument readings (3 minutes per day); daily instrument calibrations and drift checks (3 minutes per day); and weekly pump inspections (15 minutes per week). Instrument readings are assumed to be collected electronically; thus, the additional time is for downloading additional data and organizing it for storage. Smaller facilities may record instrument readings manually. For a facility with a typical process, an average of 0.02 hours per day is estimated to prepare and print recordkeeping forms and to manually record the instrument readings on the forms. This includes 2 hr/yr to prepare and print recordkeeping forms and 10 seconds to record each reading for 9 pumps monitored monthly and 452 valves monitored semiannually. The time to prepare reports is estimated to be the same under both subparts because the information in the new records must be maintained on-site, but it does not have to be reported.

The average annual burden to industry over the three years for these recordkeeping and reporting requirements is estimated at 24,525 hours per year. There are neither capital/startup

nor O&M costs. This estimate is based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$114.49 ($54.52 + 110%)
Technical	$98.20 ($46.76 + 110%)
Clerical	$48.53 ($23.11 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operations and Maintenance Costs

The only industry costs associated with the information collection activity in the standards are labor costs. To the extent possible, the requirements of this standard are consistent with industry practices. VOC monitors used for leak detection are typically used in the industry for safety reasons and do not impose an additional cost to the respondents. Consequently, there are no capital or O&M costs associated with this standard.

(iii) Capital/Start-up vs. Operation and Maintenance (O&M) Costs

This is not applicable because this is a leak detection and repair program with no continuous monitoring equipment, as stated in the previous section.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $55,970.46 for subpart GGG, and $11,837.64 for subpart GGGa. The combined total cost is $67,808 (rounded).

This cost is based on the average hourly labor rate as follows:

Managerial	$62.27 (GS-13, Step 5, $38.92 + 60%)
Technical	$46.21 (GS-12, Step 1, $28.88 + 60%)
Clerical	$25.01 (GS-6, Step 3, $15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in both Tables 2a and 2b.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The respondent universe is shown in two parts, subpart GGG and subpart GGGa.

Respondent Universe - Subpart GGG			
40 CFR Part 60, Subpart GGG	(A) No. of Existing Sources	(B) No. of Reports for Existing Sources	(C) Total Annual Responses (AxB)
First Year	130	2	260
Second year	130	2	260
Third year	130	2	260

The average number of respondents each year is 130. All subject facilities are subject to semiannual reporting requirements. The number of annual responses for subpart GGG is 260.

Respondent Universe - Subpart GGGa					
40 CFR Part 60, Subpart GGGa	(A) No. of New Sources/Year	(B) No. of Initial Reports for New Sources	(C) No. of Existing Sources	(D) No. of Reports for Existing Sources	(E) Total Annual Responses (AxB+CxD)
First year	0	0	30	2	60
Second year	0	0	30	2	60
Third year	0	0	30	2	60

It is assumed that no facilities will be subject to initial notification requirements over the three-year period of this ICR. An average of 30 facilities per year will be subject to subpart GGGa over the three-year period of this ICR. All facilities are subject to semiannual reporting requirements. The number of annual responses for subpart GGGa is 60.

The total number of responses for subparts GGG and GGGa combined is 320 (260 + 60 = 320).

The table below shows the combined total labor burden and cost for subparts GGG and GGGa as computed in Tables 1a and 1b.

Respondent – Combined Labor Hours and Burden			
Citation Subpart	Reporting (hours).	Recordkeeping (hours)	Cost (dollars)

Respondent – Combined Labor Hours and Burden			
GGG (Table 1a)	2484.00	16,999.88	1,842,962.79
GGGa (Table 1b)	552.00	4,489.31	476,853.37
Subtotals (rounded)	3,036	21,489	
Totals (rounded)	24,525		$2,319,816

The total number of burden hours is 24,525. The total annual labor cost is $2,319,816.

There are no annual capital and O&M costs to the regulated entities. Capital and O&M costs are not applicable because this is a leak detection and repair program with no continuous monitoring equipment.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents appear below (Tables 1a, 1b, 2a, and 2b) and are summarized above in sections 6(c) and 6(d), respectively. The total number of burden hours for the respondents is 24,525. The total annual labor cost for the respondents is $2,319,816. There are no annual capital and O&M costs to the regulated entities.

6(f) Reasons for Change in Burden

There is an overall decrease in the number of burden labor hours and an increase in the labor hour cost. The burden hours have decreased because we anticipate that no new refineries will be built in the United States over the next three years. This results in a decrease in the number of labor burden hours. We also refined our estimate of the number of major refineries. This calculation reduced the number of affected facilities.

The increase in labor hour cost is due to a recalculation of burden using current labor rates and the correction of a mathematical error.

There are no annual capital and O&M costs to the regulated entities. Capital and O&M costs are not applicable because this is a leak detection and repair program with no continuous monitoring equipment.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2010-0357. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue N.W., Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0357 and OMB Control Number 2060-0067 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information

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

Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent /Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/ Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.10)	(H) Cost/ Year, $$
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. REPORT REQUIREMENTS								
A. Read Instructions	1	1	1	0	0	0	0	0
B. Required Activities								
Initial performance test	24	1	24	0	0	0	0	0
Repeat performance test	24	1	24	0 [b]	0	0	0	0
C. Create Information (Included in 3B)								
D. Gather Existing Information (Included in 3E)								
E. Write Report								
Notification of construction or reconstruction	2	1	2	0	0	0	0	0
Notification of anticipated startup	2	1	2	0	0	0	0	0
Notification of actual startup	2	1	2	0	0	0	0	0
Notification of initial performance test	2	1	2	0	0	0	0	0

Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent /Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/ Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.10)	(H) Cost/ Year, $$
Report of performance test (Included in 3B)								
Semiannual work practice reports	8	2	16	135 [c]	2,160	108	216	234,959.40
Subtotal for Reports					2,484			$234,959.40
4. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 3A)								
B. Plan Activities (Included in 3B)								
C. Implement Activities (Included in 3B)								
D. Develop Record System (Not Applicable)								
E. Time to Enter Information								
Records of operating parameters [e]	0.30	365 [d]	109.5	135 [c]	14,782.50	739.13	1,478.25	1,608,003.39
F. Train Personnel (Not Applicable)								
G. Audits (Not Applicable)								
Subtotal for Recordkeeping					16,999.88			$1,608,003.39
5. Total Annual Labor Burden and Cost (rounded)					19,484			$1,842,963

Assumptions:

[a] Only existing facilities. All new facilities subject to subpart GGGa.

[b] Assume 20 percent of initial performance tests must repeat due to failure.

[c] Assume that average number of affected facilities over the next three years is equal to the current number of facilities (135) because affected facilities after November 7, 2006 will be subject to subpart GGGa instead of subpart GGG.

[d] Assume operation is 365 days per year as specified in the NSPS review document.

[e] Although monitoring of the various components may be required on a weekly, monthly, quarterly, semiannual, or annual basis, given the number of components that must be monitored at any facility, monitoring overall is essentially occurring daily. Therefore, it is assumed that the average recordkeeping time for each day's worth of monitoring is 0.30 hours and that monitoring is done 365 days per year.

Table 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal) [a]

Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.10)	(F) Cost/ Year, $ $
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. REPORT REQUIREMENTS								
A. Read Instructions	1	1	1	0	0	0	0	0
B. Required Activities								
Initial performance test	24	1	24	0	0	0	0	0
Repeat performance test	24	1	24	0 [b]	0	0	0	0
C. Create Information (Included in 3B)								
D. Gather Existing Information (Included in 3E)								
E. Write Report								
Notification of construction or reconstruction	2	1	2	0	0	0	0	0
Notification of anticipated startup	2	1	2	0	0	0	0	0
Notification of actual startup	2	1	2	0	0	0	0	0
Notification of initial performance test	2	1	2	0	0	0	0	0
Report of performance test (Included in 3B)								

Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.10)	(F) Cost/ Year, $ $
Semiannual work practice reports	8	2	16	30	480	24	48	52,213.20
Subtotal for Reports					552			$52,213.20
4. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 3A)								
B. Plan Activities (Included in 3B)								
C. Implement Activities (Included in 3B)								
D. Develop Record System (Not Applicable)								
E. Time to Enter Information								
Records of operating parameters at large refiners [e]	0.40 [c]	365 [d]	148	22.5 [e]	3,333.00	166.50	333.00	362,229.08
Records of operating parameters for small refiners	0.42 [c]	365 [d]	153	3.75 [e]	573.75	28.69	57.38	62,411.09
F. Train Personnel (Not Applicable)								
G. Audits (Not Applicable)								
Subtotal for Recordkeeping					4,489.31			$424,640.17
5. Total Annual Labor Hours and Cost (rounded)					5,041			$476,853

Assumptions:

[a] There are approximately 30 refineries (respondents) subject to the standard.
[b] Assume 20% of initial performance tests must repeat due to failure.
[c] Assume that most facilities need an additional 0.10 hours per day to complete the tasks required by the new standards (0.30 + 0.10 = 0.40); and, an additional 0.02 hours per day are needed for small refineries with manual recordkeeping of instrument readings (0.40 + 0.02 = 0.42).
[d] Assume operation for 365 days per year as specified in the NSPS review document.
[e] Assume that 75 percent of the process units are located at large refineries (30 x 75% = 22.5), and that 25 percent of the new process units are located at small refineries and half of those use manual recordkeeping of instrument readings (20 x 25% x 0.5 = 3.75).

Table 2a: Annual Burden and Cost to the Federal Government - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year	(D) Respondents/ Year	(E) EPA Technical Hours/Year [b]	(F) EPA Managerial Hours/Year (E x 0.05)	(G) EPA Clerical Hours/Year (E x 0.10)	(I) Cost per Year, $$
Performance Test Report Review (New Plants)	4	1.2 [a]	4.80	0	0	0	0	0
Notification of construction	2	1	2	0	0	0	0	0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	0
Notification of actual startup	0.5	1	0.5	0	0	0	0	0
Notification of initial test	0.5	1.2	0.6	0	0	0	0	0
Review test results	8	1.2	9.6	0	0	0	0	0
Report Review (Existing Plants)	4	2	8	135	1,080	54	108	55,970.46
Total Annual Labor Burden and Cost (rounded)					1,242			$55,970.46

Assumptions:

[a] Assume that 20 percent of the respondents will retest.

Table 2b: Annual Burden and Cost to the Federal Government - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year	(D) Plants/ Year	(E) EPA Technical Hours/ Year [b]	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost Per Year, $$
Performance Test Report Review (New Plants)	4	1.2 [a]	4.8	0	0	0	0	0
Notification of construction	2	1	2	0	0	0	0	0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	0
Notification of actual startup	0.5	1	0.5	0	0	0	0	0
Notification of initial test	0.5	1.2	0.6	0	0	0	0	0
Review test results	8	1.2	9.6	0	0	0	0	0
Report Review (Existing Plants)	4	2	8	30	240	12	24	11,837.84
Total Annual Labor Hours and Cost (rounded)					276			$11,838

Assumptions:

[a] Assume that 20 percent of the respondents will retest.