

**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 0983.14, 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 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, and was last-amended June 2, 2008. 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 were incorporated in a new subpart GGGa that applies to sources that commence construction, reconstruction, or modification after November 7, 2006. The final 2008 amendments to subpart GGG extends a stay of the definitions for process units and capital expenditure established at 40 CFR 60.480a(f) for NSPS subpart Vva, and at 40 CFR 60.590a(e) for NSPS subpart GGGa. This information is being collected to assure compliance with 40 CFR part 60, subparts GGG and GGGa.

In general, all NSPS standards require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Owners or operators 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. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

The Environmental Protection Agency's (EPA's) databases show that approximately 130

refineries are currently subject to NSPS subpart GGG. In addition, it is assumed that 30 of the 130 refineries are also subject to NSPS subpart GGGa. There are no additional respondents per year expected for these rules for the next three years.

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

The “Affected Public” are owners and operators of petroleum refineries that have compressors and/or the group of equipment (e.g., valves, pumps, flanges, etc.) within a process unit in VOC service. The “burden” to the Affected Public may be found below in both Tables 1a: Annual Respondent Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal) and 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 either Federal employees or government contractors. This burden may be found below in both Tables 2a: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal) and 2b: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal).

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 (CAA), 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 non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

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/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 procedures or 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 in petroleum refineries cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the 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 recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations. Semiannual reports shall be submitted itemizing the information for each month.

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

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

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly 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 its 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, duplication does not exist.

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 (78 FR 35023) on June 11, 2013. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Consultations with the Agency's industry experts were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standards to make it easier to comply. In developing this ICR, we contacted: 1) the American Petroleum Institute, at (202) 682-8000; and 2) the American Fuel and Petrochemical Refineries, at (202) 457-0480.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to 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 United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2911, which corresponds to the North American Industry Classification System (NAICS) code 324110 for Petroleum Refineries.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG and GGGa). NSPS Subpart GGG references the compliance requirements of NSPS subpart VV, and NSPS subpart GGGa references the compliance requirements of NSPS subpart VVa.

A source must make the following reports:

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

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

Reports for 40 CFR Part 60, Subparts GGG and GGGa	
Semiannual reports (subpart GGGa)	60.486a, 60.487a(a-c)
Performance test	60.8, 60.487(e)

A source must keep the following records:

Recordkeeping	
40 CFR Part 60, Subpart GGG	
All measurements, monitoring device, and performance testing measurements	60.7(e)
Comply with the provisions of 60.486	60.592(e)
The date and instrument reading of each monitored component must be recorded	N/A
The following information for each detected leak shall be recorded in a log and kept for 2 years: description of leaking equipment, repair methods used to stop the leaks, and the dates of repair	60.486(c)
Information pertaining to design requirements or closed vent systems and control devices	60.486(d)
Equipment identification numbers and designations, and dates of performance tests	60.486(e)
Dates and results of weekly visual inspections	N/A
Information related to instrument calibrations and drift checks	N/A
Information pertaining to valves and pumps that are designated as unsafe to monitor or difficult to monitor	60.486(f)
Information pertaining to valves complying with alternative compliance requirements	60.486(g)
Design criteria and any changes	60.486(h)
Records for use in determining exemptions	60.486(i)
Information and data to demonstrate that a piece of equipment is not in VOC service	60.486(j)
40 CFR Part 60, Subpart GGGa	
All measurements, monitoring device, and performance testing measurements	60.7(e)
Comply with the provisions of 60.486a	60.592a(e)

Recordkeeping	
40 CFR Part 60, Subpart GGG	
The date and instrument reading of each monitored component must be recorded	60.486a(a)
Each detected leak shall be recorded in a log and kept for 2 years	60.486a(c)
Information pertaining to design requirements or closed vent systems and control devices	60.486a(d)
Equipment identification numbers and designations, and dates of performance tests	60.486(e)(1-5)
Dates and results of weekly visual inspections	60.486a(e)(6)
Information related to instrument calibrations and drift checks	60.486a(e)(7)
Information pertaining to valves and pumps that are designated as unsafe to monitor or difficult to monitor	60.486a(f)
Information pertaining to valves complying with alternative compliance requirements	60.486a(g)
Design criteria and any changes	60.486a(h)
Records for use in determining exemptions	60.486a(i)
Information and data to demonstrate that a piece of equipment is not in VOC service	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. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 30 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions
Perform initial performance test as per 40 CFR 60.485, Reference Method 21 and 22 tests, and

Respondent Activities
repeat performance tests if necessary
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

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring system.) Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. 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 required information:

Agency Activities
Observe initial performance tests and repeat performance tests if necessary
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry

Agency Activities
Audit facility records
Input, analyze, and maintain data in the Online Tracking Information System (Otis).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, 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/operator for two years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). We estimate only five sources within the respondent universe are small entities. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of this regulation. 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 entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. 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 limitations 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 Tables 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal) and 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

Both Tables 1a and 1b, shown below, document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of 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

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 24,886 hours (Total Labor Hours from Tables 1a and 1b below). These hours are based on Agency studies and background documents from the development of the regulation, 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	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "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/Startup and Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject 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 used typically in the industry for safety reasons and do not impose an additional cost to the respondents. Consequently, there are no capital/startup or operation and maintenance costs.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

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 such activities 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 \$66,335.

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), 2013 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 Table 2a: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal) and Table 2b: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 130 existing respondents will be subject to subpart GGG. This number is not expected to change over the next three years. In addition, 30 of the 130 refineries are also subject to NSPS subpart GGGa. The overall average number of respondents, as shown in the table below, is 130 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	130	0	0	130
2	0	130	0	0	130
3	0	130	0	0	130
Average	0	130	0	0	130

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 130.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Subpart GGG Semiannual Reports	130	2	0	260
Subpart GGGa Semiannual Reports	30	2	0	60
			Total	320

The number of Total Annual Responses is 320.

The total annual labor costs are \$2,434,325. Details regarding these estimates may be found below in both Tables 1a: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal) and 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGGa) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1a, 1b, 2a and 2b, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 24,886 hours at a cost of \$2,434,325. Details regarding these estimates may be found below in both Tables 1a: Annual Respondent Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGG) (Renewal) and 1b: Annual Respondent Burden and Cost - NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subpart GGGa) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 78 hours per response.

Summary of Respondent Burden

Standard	Reporting Burden (hr)	Recordkeeping Burden (hr)	Total Burden (hr)	Total Cost (\$)
Subpart GGG	2,392	16,370	18,762	\$1,835,274
Subpart GGGa	552	5,572	6,124	\$599,051
Total			24,886	\$2,434,325

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,472 labor hours at a cost of \$66,335. See below both Tables 2a: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGG) (Renewal) and 2b: Average Annual EPA Burden and Cost – NSPS for Equipment Leaks of VOC in Petroleum Refineries (40 CFR Part 60, Subparts GGGa) (Renewal).

Summary of Agency Burden

Standard	Total Burden (hr)	Total Cost (\$)
Subpart GGG	1,196	\$53,897
Subpart GGGa	276	\$12,438
Total	1,472	\$66,335

6(f) Reasons for Change in Burden

There are several changes to the estimated burden as currently identified in the OMB Inventory of Approved Burdens. These differences are not due to any program changes. There is a decrease in the respondent and Agency burden for subpart GGG due to a correction of the number of respondents from 135 to 130. In addition, there is an increase in the respondent burden for subpart GGGa due to a mathematical correction. The previous ICR incorrectly calculated the amount of time it would take to record operating parameters at large and small

refineries for subpart GGGa. This ICR also updates all burden costs to reflect the current labor rates. These changes result in an overall increase in respondent burden and a decrease in Agency burden for both subparts combined.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 78 hours per response (rounded.) “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-2013-0303. 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), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0303 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, Subpart GGG) (Renewal) ^a

Activity	(A) Persons Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$101.22 (E=C x D)	(F) Management Hours per Year @ \$123.04 (F= E x 0.05)	(G) Clerical Hours per Year @ \$51.18 (G= E x 0.1)	(H) Total Labor Costs per Year ^a
1. Applications	N/A							
2. Survey and studies	N/A							
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 ^b	24	1	24	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write Report								
Notification of construction or reconstruction ^e	2	1	2	0	0	0	0	\$0
Notification of anticipated startup ^e	2	1	2	0	0	0	0	\$0
Notification of actual startup ^e	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^e	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Semiannual work practice reports ^{c, f}	8	2	16	130	2,080	104	208	\$233,979.20
Subtotal for Reporting Requirements						2,392		\$233,979.20
4. Recordkeeping Requirements								
A. Read Instructions	See 3A							
B. Plan Activities	See 3B							

Activity	(A) Persons Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$101.22 (E=C x D)	(F) Management Hours per Year @ \$123.04 (F= E x 0.05)	(G) Clerical Hours per Year @ \$51.18 (G= E x 0.1)	(H) Total Labor Costs per Year ^a
C. Implement Activities	See 3B							
D. Develop Record System	N/A							
E. Time to Enter Information								
Records of operating parameters ^{c, d}	0.30	365	109.5	130	14,235	711.75	1,423.50	\$1,601,295.15
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						16,370		\$1,601,295.15
TOTAL LABOR BURDEN AND COST (rounded)						18,762		\$1,835,274

Assumptions:

^a NSPS GGG only includes facilities that commenced construction, reconstruction, or modification prior to November 7, 2006. All new facilities and facilities that commence construction, reconstruction, or modification after November 7, 2006 are 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 (130) because affected facilities after November 7, 2006 will be subject to subpart GGGa instead of subpart GGG. These affected facilities under subpart GGG (i.e., that were either new, reconstructed, or modified affected source prior to November 16, 2007) are not required to comply with the requirements of subparts Vva/GGGa until EPA takes final action to require compliance and publishes a document in the Federal Register (see 60.480a(f)(2) of subpart Vva). Therefore, we have assumed that these facilities are complying with subparts VV/GGG even when many new sources may have opted already to comply with the subparts Vva/GGGa standards for the purpose of this burden estimate.

^d 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.

^e Owners or operators of the affected facilities must make one-time-only notifications.

^f The time to prepare reports is estimated to be the same as subpart GGGa, because the information in the new records must be maintained on-site, but it does not have to be reported.

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

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$101.22 (E=C x D)	(F) Management Hours per Year @ \$123.04 (F= E x 0.05)	(G) Clerical Hours per Year @ \$51.18 (G= E x 0.1)	(H) Total Labor Costs per Year ^a
1. Applications	N/A							
2. Survey and studies	N/A							
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 ^b	24	1	24	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather Existing Information	See 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	See 3B							
Semiannual work practice reports ^c	8	2	16	30	480	24	48	\$53,995.20
Subtotal for Reporting Requirements						552		\$53,995
4. Recordkeeping Requirements								
A. Read Instructions	See 3A							
B. Plan Activities	See 3B							

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$101.22 (E=C x D)	(F) Management Hours per Year @ \$123.04 (F= E x 0.05)	(G) Clerical Hours per Year @ \$51.18 (G= E x 0.1)	(H) Total Labor Costs per Year ^a
C. Implement Activities	See 3B							
D. Develop Record System	N/A							
E. Time to Enter Information								
Records of operating parameters at large refineries ^{c, d, e}	0.44	365	160.6	26.25	4,215.75	210.79	421.58	\$474,229.72
Records of operating parameters at small refineries ^{c, d, e}	0.46	365	167.9	3.75	629.63	31.48	62.96	\$70,826.52
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						5,572		\$545,056
TOTAL LABOR BURDEN and COST (rounded)						6,124		\$599,051

Assumptions:

^a There are approximately 30 existing refineries (respondents that were reconstructed, or modified affected sources after November 16, 2007) subject to the subparts NSPS GGGa/VVa standards.

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

^c Assume that most facilities need an additional 0.14 hours per day to complete the tasks required by the new standards (0.30 + 0.15 = 0.44) 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 and an additional 0.02 hours per day are needed for small refineries with manual recordkeeping of instrument readings (0.44 + 0.02 = 0.46). For a facility with a manual 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.

^d 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 monitoring is done 365 days a year.

^e Assume that 25 percent of the process units are located at small refineries and half of those use manual recordkeeping of instrument readings ($30 \times 25\% \times 0.5 = 3.75$) and that 75 percent of the process units are located at large refineries ($30 \times 75\% = 22.5$) and thus the number of process units that do not need additional time for manual recordkeeping is ($3.75 + 22.5 = 26.25$)

^f Owners or operators of the affected facilities must make one-time-only notifications

^g The time to prepare reports is estimated to be the same as subpart GGG because the information in the new records must be maintained on-site, but it does not have to be reported.

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

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year	(E) Technical Hours per Year @ \$46.21 (E=C x D)	(F) Managem ent Hours per Year @ \$62.27 (F= E x 0.05)	(G) Clerical Hours per Year @ \$25.01 (G= E x 0.1)	(H) Costs per Year ^a
Performance Test Report Review (New Process Units) ^a	4	1.2	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	130	1,040	52	104	\$53,897.48
TOTAL ANNUAL BURDEN and COST (rounded)						1,196		\$53,897

Assumptions:

^a Assume that 20 percent of the respondents will repeat the performance test at new process units..

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

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year	(E) Technical Hours per Year @ \$46.21 (E=C x D)	(F) Managem ent Hours per Year @ \$62.27 (F= E x 0.05)	(G) Clerical Hours per Year @ \$25.01 (G= E x 0.1)	(H) Costs per Year ^a
Performance Test Report Review (New Process Units) ^a	4	1.2	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	\$12,437.88
TOTAL ANNUAL BURDEN and COST (rounded)						276		\$12,438

Assumptions:

^a Assume that 20 percent of the respondents will repeat performance tests at new process units. We have assumed no new respondents.