

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal), EPA ICR Number 2237.04, OMB Control Number 2060-0620.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities were proposed on January 8, 2007, promulgated on January 10, 2008, and most recently amended on January 24, 2011. The most recent amendment clarifies certain definitions and applicability provisions, but do not alter the intent, level of control, nor the environmental impacts of the regulations. These regulations apply to existing and new gasoline distribution facilities that are area sources of hazardous air pollutants (HAP). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subparts BBBBBB and CCCCCC.

In general, all NESHAP standards require initial notifications, 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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 United States Environmental Protection Agency (EPA) regional office.

Approximately 350,000 sources are currently subject to these standards, with the gasoline dispensing facility segment alone accounting for about 340,000 of these facilities. However, a large percentage of these facilities are already complying with this standard as a result of their compliance with applicable State and local rules. We have minimized or eliminated the reporting and recordkeeping requirements under this rule for most of those sources. Therefore,

the total estimated number of affected sources expected to incur reporting and recordkeeping costs under this rule is about 19,120. Also, there are no new or reconstructed facilities expected within the larger, bulk segment of the industry and new gasoline dispensing facilities are expected to be subject to State and local rules. Thus, we have estimated that no additional sources will become subject to the regulation and therefore, we expect that only existing sources will be subject to the reporting and recordkeeping requirements of the rule. We have, however, included a description of the notifications that would be required if new affected sources are constructed.

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

None of the 350,000 facilities in the United States are owned by state, local, tribal or the Federal government. They are owned and operated by privately owned for-profit businesses. The burden to the “Affected Public” may be found in Table 1.1 – 1.6: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal). The “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, HAP emissions from gasoline distribution bulk terminals, bulk plants, pipeline facilities, and gasoline dispensing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subparts BBBBBB and CCCCCC. In total, this NESHAP will regulate 9 HAP compounds normally found in gasoline, including: benzene, ethylbenzene, hexane, toluene, xylenes, isooctane, naphthalene, cumene, and methyl tert-butyl ether.

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. Continuous emission monitors are used to ensure compliance with the standards at all times. 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, 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.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subparts BBBBBB and CCCCCC.

3(a) Nonduplication

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, 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 (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is Enforcement and Compliance History Online (ECHO) which is operated and maintained by the EPA Office of Compliance. ECHO is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted both ExxonMobil at (281) 870-6050 and the American Petroleum Institute (API) at (202) 682-8319.

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.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the Part 70 permit program and the five year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five

years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 (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 gasoline distribution bulk terminals, bulk plants, pipeline facilities, and gasoline dispensing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) code are listed in the table below.

Standard (40 CFR Part 63, Subparts BBBBBB and CCCCCC)	SIC Codes	NAICS Codes
Pipeline transportation of refined petroleum products	486910	4613
Bulk gasoline terminals and bulk plants	424710	5171
Gasoline stations with convenience stores	447110	5411
Gasoline stations without convenience stores	447190	5541
Hazardous materials trucking - local	484220	4214
Hazardous materials trucking – long distance	484230	4213

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC).

A source must make the following reports:

Notifications	
Initial notifications, reports of startups, shutdowns, malfunctions, anticipated construction/reconstruction, and modification	63.5, 63.9(b)(2-5), 63.10(d)(5), 63.867(a)
Notification and report of performance test and results	63.7(a-b), 63.9(e), 63.10(d)(2)
Notification of initial continuous monitoring system (CMS)/ continuous opacity monitoring system (COMS) demonstration	63.9(g), 63.867(a)
Notification and report of compliance status	63.9(h), 63.9(b)(2), 63.11095(b).

A source must keep the following records:

Recordkeeping	
Five years retention of records	63.10(b)(1), 63.11094(a)
Startup, shutdown, and malfunction plan	63.6(e)(3), 63.866(a)
Records of startup, shutdown, and malfunction	63.6(e)(3)(iii)-(iv), 63.10(b)(2)(i)-(v)
Records of performance tests	63.10(b)(2)(viii)
Documentation supporting initial notifications and notification of compliance status	63.10(b)(2)(xiv), 63.11094(b)
Records of annual inspections	63.11094(a) and (e)
Record of operating parameter monitoring data, as well as specific records to ensure that the monitoring activities will provide an indication of the facility's compliance, are to be kept pursuant to	63.11094(b) and (f).

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 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 18, 25, 271, 1A tests, and 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.
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.

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
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Integrated Compliance Information System (ICIS) and ECHO.

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 and note the operating conditions under which compliance was achieved. 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 is reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 five years.

5(c) Small Entity Flexibility

Since these regulations address area sources of HAP emissions (i.e., a source that emits less than 10 tons per year of any individual hazardous air pollutant (HAP) or less than 25 tons per year of any combination of HAP), the a majority of the respondents (i.e., owners or operators of gasoline dispensing facilities, bulk plants, bulk terminals, pipeline breakout stations, and pipeline pumping stations) are typically small facilities and many of them meet the definition of a small business entity (i.e., small business). Therefore, the impact on small entities

(i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, 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. Construction, modification, and reconstruction reports take very little time to complete and are filed only once. Equipment leak monitoring and storage tank inspection records are brief, and cargo tank vapor tightness documentation will be supplied primarily by independent cargo tank operators and kept at the gasoline distribution facility for each cargo tank and railcar that is to be loaded at the facility. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1.1 – 1.6: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents 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 175,308 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP 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	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "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 type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CPMS for vapor processors	\$0	0	\$0	\$1,000	110 (10% of Bulk Terminals)	\$110,000

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$110,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$110,000.

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 \$1,085,741.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (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 19,120 existing respondents will incur a reporting or recordkeeping burden as a result of the NESHAP. This estimate consists of the following: 1,100 bulk terminals, 460 pipeline breakout stations, 1,800 pipeline pumping stations, 5,900 bulk plants, and 9,860 gasoline dispensing facilities. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 19,120 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	19,120	0	0	19,120
2	0	19,120	0	0	19,120
3	0	19,120	0	0	19,120

Number of Respondents					
Average	0	19,120	0	0	19,120

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

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 19,120.

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
Initial Notification	19,120	0	0	0
Initial Performance Test	14,695	0	0	0
Notification of Compliance Status	14,695	0	0	0
Storage Tank Inspections	1,560	1	0	1,560
Semiannual Compliance Report	1,714	2	0	3,428
Non-routine reports	1,912	1	0	1,912
			Total	6,900

The number of Total Annual Responses is 6,900.

The total annual labor costs are \$17,163,140. Details regarding these estimates may be found below in Table 1.1 – 1.6: Annual Respondent Burden and Cost – NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities; and Gasoline Dispensing Facilities (40 CFR part 63, subparts BBBBBB and CCCCCC) (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 in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 175,308. Details regarding these estimates may be found in Table 1.1 – 1.6: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing

Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 25 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$110,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 23,856 labor hours at a cost of \$1,085,741. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal).

6(f) Reasons for Change in Burden

The overall increase in burden from the most recently approved ICR is due to an adjustment to the labor rates, mathematical corrections, and corrections to the number respondents required for each burden item. The previous ICR contained several errors and did not correctly reflect the number of respondents subject to each reporting and recordkeeping requirement after the initial 3-year rule implementation period. Further, the burden estimates did not match the assumptions stated in the table footnotes. Specifically, the previous ICR did not account for the burden associated with equipment leak inspections. In this ICR, we have conducted a thorough review of the assumptions and updated all burden estimates, as appropriate.

There is however, a small decrease in the Agency cost from the previous ICR due to a mathematical correction. The previous ICR incorrectly calculated and overestimated Agency labor costs. This correction results in an apparent decrease in Agency cost.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 25 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-2014-0095. 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 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) 566-1927. 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-2014-0095 and OMB Control Number 2060-0620 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 1.1: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
<i>1.1 Bulk Terminals</i>								
(a) Read and understand rule requirements ^c	6	1	6	0	0	0	0	0
(b) Prepare Initial Notification ^c	4	0	4	0	0	0	0	0
(c) Perform Initial Performance Test ^c	175	0	175	0	0	0	0	0
(d) Prepare Notification of Compliance Status ^c	4	0	4	0	0	0	0	0
(e) Perform annual storage tank inspection ^d	12	1	12	1,100	13,200	660	1,320	\$1,486,161.60
(f) Perform equipment leak inspections ^d	2	12	24	1,100	26,400	1,320	2,640	2972323.2
(g) Keep records of performance tests, storage tank and equipment leak inspections, and cargo tank vapor tightness documentation	0.75	12	9	1,100	9,900	495	990	\$1,114,621.20
(h) Submit semiannual compliance report	4	2	8	1,100	8,800	440	880	\$990,774.40
Subtotal Reporting [(h)]						10,120		\$990,774.40
Subtotal Recordkeeping [(e) - (g)]						56,925		\$5,573,106.00
TOTAL						67,045		\$6,563,880.40

Assumptions for Table 1.1:

^a We expect no new affected sources the next 3 years of this ICR. Therefore, the estimated number of respondents remains unchanged as 1,100 existing bulk terminals.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Reading the rule, preparing Initial Notification, performing initial performance test, and preparing Notification of Compliance Status are one-time activities.

^d Assumed that all respondents are currently performing annual storage tank inspections; and, that all are currently performing equipment leak inspections at least

once per month.

Table 1.2: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Mgmt. person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
<i>1.2 Pipeline Breakout Stations</i>								
(a) Read and understand rule requirements ^c	6	1	6	0	0	0	0	0
(b) Prepare Initial Notification ^c	8	1	8	0	0	0	0	0
(c) Prepare Notification of Compliance Status ^c	8	1	8	0	0	0	0	0
(d) Perform annual storage tank inspection ^d	12	1	12	460	5,520	276	552	\$621,485.76
(e) Perform equipment leak inspections ^d	2	12	24	460	11040	552	1104	1242971.52
(f) Keep records of storage tank and equipment leak inspections ^d	16	1	16	460	7,360	368	736	\$828,647.68
(g) Submit semiannual compliance report	4	2	8	460	3,680	184	368	\$414,323.84
Subtotal Reporting [(g)]						4,232		\$414,323.84
Subtotal Recordkeeping [(d) - (f)]						27,508		\$2,693,104.96
TOTAL						31,740		\$3,107,428.80

Assumptions for Table 1.2:

^a We expect no new affected sources the next 3 years of this ICR. Therefore, the estimated number of respondents remains unchanged as 460 existing pipeline breakout stations.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Reading the rule, preparing Initial Notification, and preparing Notification of Compliance Status are one-time activities.

^d Assumed that all respondents are currently performing annual storage tank inspections; and, that all are currently performing equipment leak inspections at least once per month.

Table 1.3: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden item	(A) Person hours per occurrence ^e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
<i>1.3 Pipeline Pumping Stations</i>								
(a) Read and understand rule requirements ^c	4	1	4	0	0	0	0	0
(b) Prepare Initial Notification ^c	1	1	1	0	0	0	0	0
(c) Prepare Notification of Compliance Status ^c	1	1	1	0	0	0	0	0
(d) Perform equipment leak inspections	1	12	12	1,800	21,600	1,080	2,160	\$2,431,900.80
(e) Keep records of equipment leak inspections ^d	0.1	12	1.2	1,800	2,160	108	216	\$243,190.08
(f) Submit semiannual compliance report ^e	0.25	2	0.5	36	18	0.9	1.8	\$2,026.58
Subtotal Reporting [(f)]						21		\$2,026.58
Subtotal Recordkeeping [(d) - (e)]						27,324		\$2,675,090.88
TOTAL						27,345		\$2,677,117.46

Assumptions for Table 1.3:

^a We expect no new affected sources the next 3 years of this ICR. Therefore, the estimated number of respondents remains unchanged as 1,800 existing pipeline pumping stations.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Reading the rule, preparing Initial Notification, and preparing Notification of Compliance Status are one-time activities.

^d Assumed that all respondents are currently performing equipment leak inspections at least once per month.

^e Assumed that, on an annual average basis, 2 percent of facilities (36) will be required to submit a semiannual compliance report because of delays in repairing equipment leaks.

Table 1.4: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
<i>1.4 Bulk Plants</i>								
(a) Read and understand rule requirements (in States without submerged fill rules) ^c	4	1	4	0	0	0	0	0
(b) Read and understand rule requirements (in States with submerged fill rules) ^c	2	1	2	0	0	0	0	0
(c) Prepare Initial Notification ^c	2	1	2	0	0	0	0	0
(d) Prepare Notification of Compliance Status ^c	1	1	1	0	0	0	0	0
(e) Perform equipment leak inspections ^d	0.25	12	3	5,900	17,700	885	1,770	\$1,992,807.60
(f) Keep records of equipment leak inspections ^d	0.1	12	1.2	5,900	7,080	354	708	\$797,123.04
(g) Submit semiannual compliance report ^e	1	2	2	118	236	11.8	23.6	\$26,570.77
Subtotal Reporting [(g)]						271		\$26,570.77
Subtotal Recordkeeping [(e) - (f)]						28,497		\$2,789,930.64
TOTAL						28,768		\$2,816,501.41

Assumptions for Table 1.4:

^a We expect no new affected sources the next 3 years of this ICR. Therefore, the estimated number of respondents remains unchanged as 5,900 existing bulk plants.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for

the benefit packages available to those employed by private industry.

^c Reading the rule, preparing Initial Notification, and preparing Notification of Compliance Status are one-time activities. Note: 25% of the respondents are in States without bulk plant rules and 75% are in States with rules.

^d Assumed that all respondents are currently performing equipment leak inspections at least once per month.

^e Assumed that, on an annual average basis, 2 percent of facilities (118) will be required to submit a semiannual compliance report because of delays in repairing equipment leaks.

Table 1.5: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
<i>1.5 Gasoline Dispensing Facilities</i>								
(a) Read and understand rule requirements (facilities >100k already in compliance) ^c	0.5	1	0.5	0	0	0	0	0
(b) Read and understand rule requirements (facilities <100k already in compliance) ^c	0.25	0.33	0.08	0	0	0	0	0
(c) initial vapor balance system testing ^c	6	1	6	0	0	0	0	0
(d) Prepare Initial Notification ^c	1	1	1	0	0	0	0	0
(d) Prepare Notification of Compliance Status ^c	1	1	1	0	0	0	0	0
(e) vapor balance system testing ^d	6	0.3	1.8	9,860	17,748	887.4	1,774.8	\$1,998,211.82
Subtotal Reporting [(e)]						20,410		\$1,998,211.82
Subtotal Recordkeeping [NA]						0		0
TOTAL						20,410		\$1,998,211.82

Assumptions for Table 1.5:

^a We expect no new affected sources the next 3 years of this ICR. Of the total 340,000 facilities, 243,587 facilities with throughputs of <100,000 gpm that are complying with a SLT submerged fill requirement, and for the 85,340 facilities with throughputs of >100,000 gpm that are complying with a state (SLT) vapor balancing requirement, there are no other reporting or recordkeeping requirements associated with this rule for this ICR. Therefore, the estimated number of respondents with recordkeeping and reporting requirements remains unchanged from the previous ICR as 11,073 gasoline dispensing facilities, of which 9,860 install vapor balance system and 1,213 must add submerged filled as a result of this rulemaking.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for

the benefit packages available to those employed by private industry.

^c Reading the rule, preparing Initial Notification, conducting an initial vapor balance system test, and preparing Notification of Compliance Status are one-time activities.

^d Assume vapor balance pressure retesting require every three years. There are 9,860 gasoline dispensing facilities would have to retest.

Table 1.6: Annual Respondent Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Burden Item	Average Number of Respondents per year	Total person-hours per year	Total Cost per year
<i>Subtotal for Reporting Requirements</i>	19,120	35,054	\$14,179,557.90
<i>Subtotal for Recordkeeping Requirements</i>		140,254	\$2,983,582.00
TOTAL LABOR BURDEN AND COST		175,308	\$17,163,140

Sector	Number of Sources	Number of Responses	Reporting Burden (Hr)	Recordkeeping Burden (Hr)
Bulk Terminals	1,100	3,410	10,120	56,925
Pipeline Breakout Stations	460	1,426	4,232	27,508
Pipeline Pumping Stations	1,800	252	21	27,324
Bulk Plants	5,900	826	271	28,497
Gasoline Dispensing Facilities	9,860	986	20,410	0
Total	19,120	6,900	35,054	140,254

Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities, and Gasoline Dispensing Facilities (40 CFR Part 63, Subparts BBBBBB and CCCCCC) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Review of storage tank inspection reports	4	1	4	1,560	6,240	312	624	\$326,601.60
Review semiannual compliance reports	2	2	4	1,714	6,856	342.8	685.6	\$358,843.04
Review of other, non-routine reports ^c	4	1	4	1,912	7,648	382.4	764.8	\$400,296.32
TOTAL LABOR BURDEN AND COST (rounded)						23,855.6 23,856		\$1,085,740.9 6 \$1,085,741

Assumptions for Table 2:

^a Number of activities per year is the sum of the number of applicable respondents from Tables 1.1 through 1.5.

^b This cost is based on the average hourly labor rate from the Office of Personnel Management (OPM) “2014 General Schedule” which excludes locality rates of pay.

^c Assumed that 10 percent of affected facilities industry-wide will submit non-routine reports each year. (19,120 x 10% = 1,912)