

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Vinyl Chloride

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Vinyl Chloride (40 CFR part 61, subpart F) (Renewal)

1(b) Short Characterization/Abstract

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Vinyl Chloride (VC) were proposed on December 24, 1975, promulgated on October, 21, 1976, and amended on June 7, 1977, September 30, 1986, September 23, 1988, and December 23, 1992. These standards apply to exhaust gases and oxychlorination vents at ethylene dichloride (EDC) plants; exhaust gases at vinyl chloride monomer (VCM) plants; and exhaust gases, reactor opening losses, manual vent valves, and stripping residuals at polyvinyl chloride (PVC) plants. The standards also apply to relief valves and fugitive emission sources at all three types of plants.

In general, all the NESHAP standards implement Section 112(b) of the Clean Air Act, as amended, and are based on the Administrator's determination that vinyl chloride emissions from polyvinyl chloride (PVC), ethylene dichloride (EDC), and vinyl chloride monomer (VCM) plants cause or contribute to air pollution. The standards require continuous monitoring of the reactor pressure and temperature. The continuous monitoring system monitors VC emissions from the stack to judge compliance with the numerical limits in the standards. The parameters are used to judge the operation of the reactor so that the source and EPA will be aware of improper operation and maintenance.

All the 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. Adequate recordkeeping and reporting ensure that affected facilities will continue to operate control equipment and use proper work practices to achieve compliance. In addition, reporting assists EPA in identifying new facilities subject to the standards. The standards implicitly require initial reports required by the General Provisions of 40 CFR 61.7 and 61.9. These initial reports include application for approval of construction or modification, the notification of startup, and the notification of performance testing. The standards also require quarterly reporting of vinyl chloride emissions from stripping, reactor openings, and exhausts. Reports must be submitted within 10 days of each valve discharge and manual vent valve discharge. Facilities must also maintain records of reactor parameters and emissions as well as records related to malfunctions, calibrations, and leaks detected.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least three 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 regional office.

Approximately 28 sources are currently subject to the standard, and it is estimated that there will be no new growth in the industry over the next three years.

There are approximately 28 vinyl chloride plants in the United States, which are owned and operated by the vinyl chloride industry. None of the twenty-eight 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. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Vinyl Chloride (40 CFR part 61, subpart F). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F).

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

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. 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 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, vinyl chloride plants which produce: 1) ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene; 2) vinyl chloride by any process; and/or 3) one or more polymers containing any fraction of polymerized vinyl chloride - cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 61, subpart F.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, 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 standard 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 61, subpart F.

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 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 (72 FR 10735) on March 9, 2007. 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 the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS 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. Approximately twenty-eight respondents will be subject to the standard over the three-year period covered by this ICR.

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, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the 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 (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 contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are ethylene dichloride, vinyl chloride, and polyvinyl chloride manufacturing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 2821 which corresponds to the North American Industry Classification System (NAICS) 325211 for Vinyl Chloride.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Vinyl Chloride (40 CFR part 61, subpart F).

A source must make the following reports:

Notifications	
Notification and application of construction or modification	61.07
Notification of anticipated date of initial startup	61.09(a)(1)
Notification of actual startup	61.09(a)(2)
Notification of physical or operational change which may increase the emission rate	61.15
Notification of performance tests	61.13(f)
Notification of emissions testing	61.13(c)
Application for waiver of testing	61.13(i)(1), and 61.13(i)(2)
Application for equivalent equipment and procedures	61.66
Initial report	61.69
Quarterly report	61.70(a)(1)
Manual vent valve (MVV) discharge report	61.64(a)(3)
Relief valve discharge (RVD) report	61.65(a)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction, periods where the continuous monitoring system is inoperative	61.14(f)
Emission test results and other data needed to determine emissions	61.13(g), and 61.71(1)(3)
Records of leak detected	61.71(a)(1), and 61.71(a)(2)
Performance test records, leaks detected, emissions records, and daily operating records are required to be retained on-site for three years	61.67(f), and 61.71(a)

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.

Respondent Activities
Read instructions.
Perform initial performance test, Reference Method 106, 107, and or 601 test, and repeat performance tests if necessary.
Write the notification 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 equipment that provides 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
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
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 might inspect the source to determine whether the pollution control devices are properly installed and operational. 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.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA 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 five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, 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. 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 Table 1: Annual Industry Burden for NESHAP for Vinyl Chloride (40 CFR part 61, subpart F).

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 the subpart 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. Wherever 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 11,825 (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

Managerial	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "Table 2. Private industry, 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 standard 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 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)
Continuous emission monitor (CEM)	\$150,000	0	\$0	\$45,000	28	\$1,260,000

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 consists of photocopying, and postage are \$1,260,000. 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 \$1,260,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$112,082.

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

Managerial	\$54.66	(GS-13, Step 5, \$34.16 + 60%)
Technical	\$40.56	(GS-12, Step 1, \$25.35 + 60%)
Clerical	\$21.95	(GS-6, Step 3, \$13.72 + 60%)

These rates are from the Office of Personnel Management (OPM) 2004 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 in Table 2: Average Annual EPA Burden, NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F). below.

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 twenty-eight respondents will be subject to the standard. It is estimated that no additional sources per year will become subject. The overall average number of respondents, as shown in the table below is twenty-eight per year.

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

Number of Respondents					
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	28	0	0	28
2	0	28	0	0	28
3	0	28	0	0	28
Average	0	28	0	0	28

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is twenty-eight.

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
Quarterly report	28	4	n/a	112
Manuel vent valve/relief valve discharge (MVV/RVD) report	28	3	n/a	84
			Total	196

The number of Total Annual Responses is 196.

The total annual labor costs are \$754,515. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Vinyl Chloride (40 CFR part 61, subpart F), below.

6(e) Bottom Line Burden Hours 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 costs are \$754,515. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Vinyl Chloride (40 CFR part 61, subpart F), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,260,000. 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 2,834 labor hours at a cost of \$112,082. See Table 2. Annual Agency Burden and Cost: NESHAP for Vinyl Chloride (40 CFR part 61, subpart F), below.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 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's 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-2007-0054. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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, 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 Enforcement and Compliance Docket and Information Center Docket 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, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0054 and OMB Control Number 2060-0071 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: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR part 61, subpart F)

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) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	0	0	0	0	\$0
B. Required activities								
Initial performance test ^c	60	1	60	0	0	0	0	\$0
Repeat performance tests ^d	60	0.20	12	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B,							
E. Write Report								
Notification of construction/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 emission testing	2	1	2	0	0	0	0	\$0
Notification of test report	2	1	2	0	0	0	0	\$0
Notification of physical or operational change ^e	2	1	2	0	0	0	0	\$0
Application for waiver of testing ^f	8	1	8	0	0	0	0	\$0
Application of equivalency ^g	40	1	40	0	0	0	0	\$0
Initial report	24	1	24	0	0	0	0	\$0
Quarterly report ^h	50	4	200	28	5,600	280	560	\$410,900.00
MVV/RVD report ⁱ	8	8	24	28	672	33.6	67.2	\$49,308.00
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See3D							
D. Develop record system	N/A							
E. Time to enter information								
Records of reactor parameters and emission ^j	0.25	365	91.25	28	2,555	127.75	255.5	\$187,473.13

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) Cost, \$ ^b
Records of leaks detected ^k	1	52	52	28	1,456	72.8	145.6	\$106,834.00
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotals Labor Burden and cost					10,283	514.15	1,028.3	\$754,515.13
TOTAL LABOR BURDEN AND COST (rounded)					11,825.45 11,825 (rounded)			\$754,515

Assumptions:

^a We have assumed that there are approximately twenty-eight sources that are subject to the standard. We have further assumed that there will be no new growth in the industry over the next three years.

^b This ICR uses the following labor rates: \$95.32 per hour for Executive, Administrative, and Managerial labor; \$64.60 per hour for Technical labor, and \$40.09 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, ATable 10. Private industry, by occupational and industry group. @ The rates are from column 1, ATotal compensation. @ The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that it will take sixty hours to complete the performance tests.

^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.

^e Assumed that there will be no physical or operational changes over the next three years.

^f Assume it will take eight hours to prepare application for waiver of testing.

^g Assume it will take forty hours to prepare application for equivalency.

^h We have assumed that it will take fifty hours to prepare the quarterly report.

ⁱ We have estimated that there will be three discharges of manual vent valve/relief valve discharge (MVV/RVD) per year.

^j Assume that affected facilities will operate 365 days per year as required of all facilities that are subject to the rule.

^k It is estimated that it will occur fifty-two times per year to enter records of leak detection.

Table 2: Average Annual EPA Burden - NESHAP for Vinyl Chloride (40 CFR part 61, subpart F)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants 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) Cost, \$ ^b
Activity								
1. Initial performance test ^c	24	1	24	0	0	0	0	\$0
2. Repeat performance test ^d	24	0.20	4.8	0	0	0	0	\$0
3. Report review								
Notification of construction/reconstruction	1	1	1	0	0	0	0	\$0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	\$0
Notification of actual startup ^b	0.5	1	0.5	0	0	0	0	\$0
Notification of emission testing	0.5	1	0.5	0	0	0	0	\$0
Notification of physical or operational change ^e	0.5	1	0.5	0	0	0	0	\$0
Emission test report ^f	24	1	24	0	0	0	0	\$0
Application for waiver of testing ^g	24	1	24	0	0	0	0	\$0
Application for equivalency	24	1	24	0	0	0	0	\$0
Initial report	24	1	24	0	0	0	0	\$0
Quarterly report ^h	4	4	16	28	448	22.4	44.8	\$20,378.62
MVV/RVD report ⁱ	24	3	72	28	2,016	100.8	201.6	\$91,703.81
Subtotals Labor Burden and cost					2,464	123.2	246.4	\$112,082.43
TOTAL ANNUAL BURDEN AND COST (rounded)						2833.6 2,834 (rounded)		\$112,082

Assumptions:

^a We have assumed that there are approximately twenty-eight sources that are subject to the standard. We have further assumed that there will be no new growth in the industry over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$54.66 for Managerial (GS-13, Step 5, \$34.16 x 1.6), \$40.56 for Technical (GS-12, Step 1, \$25.35 x 1.6) and \$21.95 Clerical (GS-6, Step 3, \$13.72 x 1.6). These rates are from the Office of Personnel Management (OPM) A2004 General Schedule@ which excludes locality rates of pay.

^c We have assumed that it will take twenty-four hours to complete the performance tests.

^d We have assumed that 20 percent of initial performance test must be repeated due to failure.

^e Assume that there will be no physical or operational changes over the next three years.

^f It is assumed that it will take twenty-four hours to review an emissions test report.

^g Assume that it will take twenty-four hours to review application for waiver of test.

^h We have assumed that it will take four hours to review the quarterly report.

ⁱ We have assumed that there will be three discharges of manual vent valve/relief valve discharge (MVV/RVD) per year.