SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG) (Renewal), EPA ICR Number 1947.04, OMB Control Number 2060-0471.

1(b) Short Characterization/Abstract

Extraction for Vegetable Oil Production, 40 CFR part 63, subpart GGGG, were proposed on May 26, 2000, (65 FR 34252) and promulgated on April 21, 2001. Respondents are owners or operators of any existing, reconstructed, or new vegetable oil production process, which is defined as a group of continuous process equipment used to remove oil from oilseeds through direct contact with an organic solvent such as n-hexane. The term "oilseed" refers to the following agricultural products: corn germ, cottonseed, flax, peanut, safflower, soybean, sunflower and rapeseed (source of canola oil).

A vegetable oil production process is only subject to the regulation if it is a major source of hazardous air pollutant (HAP) emissions, or is collocated with other sources that are individually or collectively a major source of HAP emissions. "Major source" means that the process equipment used to produce the vegetable oil and any other operations or equipment at a facility emit or have the potential to emit 10 tons per year or more of a single HAP or 25 tons per year or more of any combination of HAP. Owners or operators of a new vegetable oil production process using solvent extraction must submit an application for construction, notification of construction commencement, notification of anticipated startup date and notification of actual startup.

The standard requires each source to develop by the startup date a plan for demonstrating compliance. The source must follow this plan each month to measure and record extraction solvent, HAP content of the extraction solvent, and oilseed inventories. Sources will also develop a startup, shutdown, and malfunction (SSM) plan to be followed during each SSM event.

As required by the National Emission Standards for Hazardous Air Pollutants (NESHAP) General Provisions (40 CFR part 63, subpart A), each source must submit initial or startup notifications. Sources must submit a compliance status notification twelve operating months after the compliance date and an annual compliance certification every subsequent twelve calendar months. An operating month is defined as any calendar month in which a source processes any quantity of listed oilseed, excluding any entire calendar month in which the source operated under an initial startup period or a malfunction period. Sources must submit SSM

reports following SSM events occurring during each qualifying malfunction period. All existing sources must develop plans for demonstrating compliance and SSM plans. The majority of burden items are one-time-only requirements; the only recurring burden consists of the annual compliance certification and periodic SSM reports which require recordkeeping and monthly compliance determinations. Owners or operators are required to submit after the initial notification=s report: (1) annual compliance certifications; (2) a deviation notification report; (3) a periodic startup, shutdown, and malfunction report; and (4) immediate SSM reports.

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 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 101 sources are currently subject to the regulation, and it is estimated that no additional new sources will become subject to the regulation in the next three years. It is further assumed that one additional source per year will become subject to the standard due to the reconstruction of an existing affected facility.

There are approximately 101 solvent extractors for vegetable oil production facilities in the United States, which are owned and operated by the solvent extraction for vegetable oil production industry. None of the 101 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately owned for-profit businesses. The burden to the "Affected Public" listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG). 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 Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (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, HAP emissions from solvent extraction for vegetable oil 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 63, subpart GGGG.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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 63, subpart GGGG.

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 10736) 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.

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, we contacted the National Oilseed Processors Association, Mr. David Ailor at (202) 842-0463, the Corn Refineries Association, Audrae Erickson at (202) 331-1634, and the National Cotton Council, Dr. Phil Wakelyn at (202) 745-7805.

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 (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 solvent extraction for vegetable oil production. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to The North American Industry Classification System (NAICS) codes, are listed below for source category description.

Standard (40 CFR part 63, Subpart GGGG)	SIC Codes	NAICS Codes
Flour and Other Grain Mill Products	2041	311211
Wet Corn Milling (except refining purchased corn oil)	2046	311221
Wet Corn Milling (refining purchased corn oil)	2046	311225
Prepared Feeds and Feed Ingredients for Animals and Fowls, Except Dogs and Cats (except slaughtered animals for pet food)	2048	311119
Prepared Feeds and Feed Ingredients for Animals and Fowls, Except Dogs and Cats (slaughtering animals for pet food)	2048	311611
Cottonseed Oil Mills (cottonseed processing)	2074	311223
Cottonseed Oil Mills (processing purchased cottonseed oil)	2074	311225
Soybean Oil Mills (processing purchased soybean oil)	2075	311225
Soybean Oil Mills (soybean processing, except edible soybean oil)	2075	311222
Vegetable Oil Mills, Except Corn, Cottonseed, and Soybean (oilseed processing)	2076	311223
Vegetable Oil Mills, Except Corn, Cottonseed, and Soybean (processing purchased vegetable and oilseed oils)	2076	311225

Standard (40 CFR part 63, Subpart GGGG)	SIC Codes	NAICS Codes
Shortening, Table Oils, Margarine and other Edible Fats and Oil, NEC (processing vegetable oils, except soybean, into edible cooking oils)	2079	311223
Shortening, Table Oils, Margarine, and Other Edible Fats and Oils, NEC (except processing vegetable and soybean oils into edible oils)	2079	311225
Shortening, Table Oils, Margarine, and Other Edible Fats and Oils, NEC (processing soybean oil into edible cooking oils from soybeans crush)	2079	311222

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 Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG).

A source must make the following reports:

Notification Reports	
Initial notification	63.9(b) and 63.2860(a)
Notification and application of construction and reconstruction	63.5(d) and 63.2860(b)
Notification of construction commencement	63.5 and 63.2860(b)
Notification of anticipated startup.	63.5(d) and 63.2860(b)
Notification of actual startup	63.6 and 63.2860(b)
Notification of compliance status	63.9(h) and 63.2860(d)
Annual compliance certification	63.2861(a)
Deviation notification report	63.2861(b)
Periodic startup, shutdown, and malfunction report	63.10(d)(5)(i) and 63.2861(c)
Immediate startup, shutdown, and malfunction report	63.10(d)(5)(ii) and 63.2861(d)

A source must keep the following records:

Recordkeeping	
Solvent, HAP content and oilseed inventory	63.2862(c)
Twelve months compliance ratio	63.2862(d)

Recordkeeping	
Startup, shutdown, and malfunction plan	63.2862(b)
Plan for demonstrating compliance	63.2862(b)

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.
Install, calibrate, maintain, and operate solvent extraction for vegetable oil production processor.
Perform initial performance test, Reference Method 311.
Develop plan for demonstrating compliance.
Develop startup, shutdown, and malfunction plan.
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
Review notifications and reports, including periodic SSM report, deviation notification report, and immediate SSM report, 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 Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG).

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 39,385 (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	$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 10. 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. 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 is 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. 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 $152,476.

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 Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG), 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 one hundred and one respondents will be subject to the standard. It is estimated that one reconstructed sources per year will become subject in the next three years. The overall average number of respondents, as shown in the table below is 101 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	1	101	0	1	101
2	1	101	0	1	101
3	1	101	0	1	101
Average	1	101	0	1	101

[1] New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

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 one hundred and one.

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
Application of construction/reconstruction	1	1	N/A	1
Notification of commencement of construction/reconstruction	1	1	N/A	1
Notification of anticipated startup	1	1	N/A	1
Notification of actual startup	1	1	N/A	1
Notification of compliance status	101	1	N/A	101
Annual compliance certification	101	1	N/A	101
Periodic SSM report	5	1	N/A	5
Immediate SSM report	1	1	N/A	1
Notification of deviation report	1	1	N/A	1
			Total	213

The number of Total Annual Responses is 213.

The total annual labor costs are $2,512,947. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG), 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 $2,512,947. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG) below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 185 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $0.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 3,855 labor hours at a cost of $152,476. See Table 2. Annual Agency Burden and Cost: NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG) below.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in the 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 185 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-2007-0059. 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) 566-1927. 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-2007-0059 and OMB Control Number 2060-0471 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 Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG)

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	(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, $ [a]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions [b]	4	1	4	0	0	0	0	$0
B. Required activities [b]								
Develop plans for demonstrating compliance [b]	80	1	80	0	0	0	0	$0
Develop SSM plan [b, c]	100	1	100	0	0	0	0	$0
C. Create information	N/A							
D. Gather existing information	See 4E							
E. Write Report								
Initial notification of intent to construct/reconstruction [b]	8	1	8	0	0	0	0	$0
Application for construction/ reconstruction [d]	8	1	8	1	8	0.4	0.8	$587.00
Notification of commencement of construction/reconstruction [d]	8	1	8	1	8	0.4	0.8	$587.00
Notification of anticipated startup [d]	8	1	8	1	8	0.4	0.8	$587.00
Notification of actual startup [d]	8	1	8	1	8	0.4	0.8	$587.00
Notification of compliance status [e]	24	1	24	101	2,424	121.2	242.4	$177.861.00
Annual compliance certification [e]	24	1	24	101	2,424	121.2	242.4	$177,861.00
Periodic startup, shutdown, malfunction report [f]	24	1	24	5	120	6	12	$8,805.00
Immediate startup, shutdown malfunction report [d, g]	8	1	8	1	8	0.4	0.8	$587.00
Notification of deviation report [d, i]	8	1	8	1	8	0.4	0.8	$587.00
4. Recordkeeping requirements								
A. Read instructions	See 3A							

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	(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, $ [a]
B. Develop record system	N/A							
C. Time to enter information								
Solvent inventory [e, h]	8	12	96	101	9,696	484.8	969.6	$711,444.00
HAP content of solvent [e, h]	8	12	96	101	9,696	484.8	969.6	$711,444.00
Oilseed inventory [e, h]	8	12	96	101	9,696	484.8	969.6	$711,444.00
D. Record startup, shutdown, malfunction activities [j]	12	12	144	1	144	7.2	14.4	$10,566.00
E. Time to train personnel [b]	40	1	40	0	0	0	0	$0
J. Time for audits	N/A							
Subtotals Labor Burden and cost					34,248	1,712.4	3,424.8	$2,512,947.00
TOTAL LABOR BURDEN AND COST (rounded)					39,385.2 39,385 (rounded)			$2,512,947

Assumptions:

[a] 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.@

[b] We have assume that there will be no new growth over the three-year period of this ICR.

[c] We have assumed that it will take one hundred hours to develop a startup, shutdown, malfunction plan.

[d] We have assumed that one existing facility will be reconstructed each year over the next three years.

[e] We have assumed that there are approximately 101 sources that are subject to the standard.

[f] We have assumed that five percent of sources will submit a periodic SSM report.

[g] It is estimated that one source will submit an immediate SSM report.

[h] We have assumed that it will take eight hours once per month for data to be recorded.

[i] We have assumed that one source will submit a notification of deviation report each year.

[j] We have estimated that it will take twelve hours to record startup, shutdown, and malfunction activities.

Table 2: Average Annual EPA Burden - NESHAP for Solvent Extraction for Vegetable Oil Production (40 CFR Part 63, Subpart GGGG)

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	(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, $ [a]
Activity								
Report review								
Initial notification [b]	8	1	8	0	0	0	0	$0
Review approve construction/reconstruction application [c]	24	1	24	1	24	1.2	2.4	$1,091.71
Notification of construction/reconstruction [c]	24	1	24	1	24	1.2	2.4	$1,091.71
Notification to begin construction [c]	4	1	4	1	4	0.2	0.4	$181.95
Notification of anticipated startup [c]	4	1	4	1	4	0.2	0.4	$181.95
Notification of actual startup [c]	4	1	4	1	4	0.2	0.4	$181.95
Review of compliance status [d]	16	1	16	101	1,616	80.8	161.6	$73,508.61
Review of annual compliance certification [d]	16	1	16	101	1,616	80.8	161.6	$73,508.61
Review of periodic startup, shutdown, malfunction reports [e]	8	1	8	5	40	2	4	$1,819.52
Review of immediate SSM report [f, g]	16	1	16	1	16	0.8	1.6	$727.81
Review of deviation report [h, i]	4	1	4	1	4	0.2	0.4	$181.95
Review compliance plans	40	1	40	0	0	0	0	$0
Review SSM plans	40	1	40	0	0	0	0	$0
Subtotals Labor Burden and cost					3,352	167.6	335.2	$152,475.77
TOTAL ANNUAL BURDEN AND COST (rounded)					3,854.8 3,855 (rounded)			$152,476

Assumptions:

[a] 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.

[b] We have assumed that there will be no new growth in the industry over the next three years.

[c] We have assumed that one existing facility will be reconstructed each year over the next three years.

[d] We have assumed that there are approximately 101 sources that are subject to the standard.

[e] We have assumed that five percent of sources will submit a periodic SSM report.

[f] It is estimated that one of the sources will submit an immediate SSM report.

[g] We have assumed that it will take sixteen hours to review an immediate SSM report.

[h] We have assumed that it will take four hours to review the deviation report.

[i] We have assumed that one source will submit a notification of deviation report each year.