SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR part 63, subpart YY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal), EPA ICR Number 1983.05, OMB Control Number 2060-0489

1(b) Short Characterization/Abstract

This Information Collection Request (ICR) is for Hazardous Air Pollutant (HAP) Emission Sources in the Carbon Black (CB) production, Cyanide (CY) chemicals manufacturing, Ethylene (ET) production, and Spandex (SP) production source categories. For the purposes of this ICR, the phrases "cyanide chemicals manufacturing," "cyanide production," and "CY production" have the same meaning.

All existing sources must be in compliance with the requirements of the Generic Maximum Achievable Control Technology (MACT) National Emissions Standard for Hazardous Air Pollutants (NESHAP) within three years of the effective date (promulgation date) of standards for an affected source. All new sources must be in compliance with the requirements of the Generic MACT (GMACT) NESHAP upon startup or prior to the promulgation date of standards for an affected source, whichever is later. Compliance is assumed through initial performance testing or design analysis, as appropriate, and ongoing compliance is demonstrated through parametric monitoring. Types of parameters monitored are incinerator temperature, scrubber flow rate, carbon adsorber regeneration frequency, as well as others. The appropriate parameter to monitor depends on the type of control device with the owner or operator chooses to comply.

The NESHAP for CB, ET, CY and SP consists of 72 existing facilities that would be subject to the major source provisions specified under the GMACT NESHAP. This consists of: 18 existing facilities for the CB production source category, 14 facilities for the CY production source category, 37 facilities for the ET production source category and 3 facilities in the SP production source category. We do not anticipate any new sources for any of the source categories. We anticipate that all of these facilities will conduct all monitoring, inspection, recordkeeping, and reporting (MIRR) requirements. These estimates are based on estimates from the most recently approved Information Collection Request (ICR) renewal. Based on these estimates, the total MIRR cost of the rulemaking for the NESHAP for CB, ET, CY and SP is estimated to be $1,080,150 (rounded) annually for the next three years. See section 6 of this ICR for more details.

Since there are no new sources in any of the source categories covered by this ICR renewal, there will be no performance test provisions. If the new source requirements are triggered, the affected source would have to fulfill the appropriate design analysis or performance test requirements. These requirements vary depending on what type of emission stream is regulated; for example, process vents, storage tanks, wastewater or equipment leaks.

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 Clean Air Act (Act) provides authority to the Agency to establish standards to control air pollution and to ensure compliance with promulgated regulations through adequate recordkeeping and reporting by the affected industries (i.e., respondents). The regulations include the New Source Performance Standards (NSPS) under section 111 of the Act, the National Emission Standards for Hazardous Air Pollutants (NESHAP) which includes the original NESHAP standards and the more recent Maximum Achievable Control Technology (MACT) or NESHAP-MACT standards under section 112 of the Act, and emission guidelines for the designated types incinerators under section 129 of the Act.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard(s) are used by regulatory agencies, the public and the regulated community for a variety of reasons including the determination of the respondent's compliance status, analytical studies to demonstrate compliance trends, and evaluations regarding the efficacy of the promulgated regulations.

The required recordkeeping and reporting are also used to: 1) certify compliance with the regulations; 2) determine the respondent's compliance with the designated emission limitation(s); 3) notify regulatory agencies when a standard is violated; 4) evaluate continuous compliance through the use of emission or operational parameter monitors; and 5) ensure that plant personnel are following the required procedures and are periodically trained, as indicated.

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

3(a) Non-duplication

The standards do not require duplication in the collection and reporting of information. If the subject standards have not been delegated, the information is sent directly to the appropriate Environmental Protection Agency (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.

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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

In estimating the burden associated with this standard, EPA consulted with Mr. Todd Miller of Continental Carbon Company for information on CB manufacturing, Mr. Bruce Raff of Syngenta Corporation for information on CY manufacturing, Ms. Karen Smidt of the American Chemistry Council for information on the ET manufacturing, and Mr. Bob Daniels of Invista for information on SP manufacturing. As part of these consultations, the persons contacted provided an estimate of the affected number of sources subject to the standard and provided information on the expected growth rate of the industry.

The standard was developed with the participation and/or consultation with industry representatives. In addition, the Agency has performed additional reviews to determine additional burden reduction opportunities. The Agency currently collects the minimum amount of information necessary to ensure compliance with the standard.

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

3(d) Effects of Less Frequent Collection

The effect of less frequent collection would be a decrease in the margin of assurance that facilities are achieving the emission reductions mandated by the CAA through the promulgation of the applicable regulations. In addition, the likelihood of detecting the poor operation and maintenance of control equipment decreases and the detection of noncompliance becomes problematic.

3(e) General Guidelines

Neither the reporting nor recordkeeping requirements violate the regulations established by Office of Management and Budget (OMB) at 5 CFR Part 1320, Section 1320.5. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent

with the permit program at 40 CFR part 70, 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 the respondent for purposes of determining the appropriate level of enforcement action. Historically, EPA notes that the most flagrant violations have extended beyond a five-year period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting noncompliance.

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 recordkeeping and reporting requirements do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS and SIC Codes

The Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) for the respondents are listed below.

Source Category	SIC Code	NAICS Code
Carbon Black	2895	325182
Cyanide	2819 and 2869	325188 and 325199
Ethylene	2869	325110
Spandex	2824	325222

This table is not meant to be exhaustive, but rather provides a guide for readers regarding the entities likely to be regulated by this standard. To determine whether the standard applies to a particular entity, please see the applicability provisions in the standard.

4(b) Information Requested

(i) Data Items

Requirement	Regulation Citation
Monitoring & Inspection	
Install, maintain, adjust, and calibrate continuous parametric monitoring systems (CPMS)	§63.996(c)
Inspect and monitor covers	§63.1063(c)
Inspect and monitor closed-vent or heat exchange system	§63.983(b), §63.983(c), §63.1084(a)
Monitor control device	§63.984(b), §63.986(c), §63.987(c), §63.988(c), §63.989(c), §63.990(c), §63.991(c), §63.992(c), §63.993(c), §63.994(c), §63.995(c), §63.996(c)
Develop startup, shutdown, and malfunction (SS&M) plan	§63.1110(b), §63.1111
Recordkeeping	
Records of maintenance	§63.1088(b), §63.1090(c), §63.1089, §63.1109(a)
Records of startup, shutdown and malfunction and actions taken	§63.998(d)
Records of malfunctioning or inoperative CPMS	§63.998(c)
Records of CPMS operation, adjustments, calibration checks, and maintenance	§63.998(c)
Records of performance test and performance evaluation results	§63.998(a)
Records of initial and compliance status notifications	§63.998(a)
Reports	
Notification of construction or reconstruction	§63.5
Notification of anticipated date of initial startup	§63.5
Initial Notification	§63.1110(a), §63.1110(c)

Requirement	Regulation Citation
Initial Compliance Status Report	§63.1110(a), §63.1110(d)
Notification of performance evaluation and performance test dates	§63.1110(a)
Performance test and performance evaluation results	§63.1090, §63.1110(d)
Startup, shutdown, and malfunction reports	§63.1110(a), §63.1111
Excess emissions and CPMS performance report	§63.1110(a)
Excess emissions and CPMS performance summary report	§63.1110(a)
Operating parameter value and rationale selection	§63.1110(a), §63.1111
Conduct control device performance test	§63.987(c), §63.988(b) §63.989(b), §63.990(b) §63.991(b), §63.992(b) §63.993(b), §63.994(b) §63.995(b)
Conduct CPMS performance evaluation	§63.996(b)

Electronic Reporting

At the present, many respondents to CAA standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the 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 20 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.

Respondent Activities
Install, calibrate, maintain, and operate CPMS for the appropriate control device
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed in Table 1
Enter information required to be recorded in Table 1.
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.

Respondent Activities
Transmit, or otherwise disclose the information.

At the present, many respondents to CAA standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

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

5(a) Agency Activities

EPA conducts one or more of the activities provided in Table 2 in connection with the acquisition, analysis, storage, and distribution of the required information. This table is introduced in Section 6(c) of this ICR.

5(b) Collection Methodology and Management

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or thru an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the Agency or delegated authority.

The results of these evaluations are entered into the Air Facility Subsystem (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is EPA’s database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and delegated authorities can retrieve and analyze the data.

5(c) Small Entity Flexibility

Minimizing the information collection burden for all sizes of organizations is a continuing effort on the EPA's part. The EPA has reduced the recordkeeping and reporting requirement respondent burden to include only the information needed by the EPA to determine compliance with the Generic MACT NESHAP. There are no small entities that fall under the CB, CY, ET, or SP production source categories.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1, attached.

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 GMACT. 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 respondent burden is shown in Table 1. The labor hours in Table 1 are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the standard, 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	$96.41 ($45.91 + 110%)
Technical	$82.74 ($39.40 + 110%)	
	Clerical	$42.25 ($20.12 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2004, "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

There are no capital/startup costs for the GMACT because there are no new sources. The total annual estimated Operating and Maintenance costs (O&M) are calculated based on the costs for the equipment required for CPMS. The total annual estimated O&M cost is $171,822 for the

CB production source category based on 18 responses, $133,640 for the CY production source category based on 14 annual responses, $27,169 for the ET production source category based on 37 responses, and $26,434 for the SP source category based upon three responses, for an annual estimated total of $359,065.

Table 3: 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)
CB	N/A	0	0	9545	18	$171,822
CY	N/A	0	0	9545	14	$133,640
ET	N/A	0	0	734	37	$27,169
SP	N/A	0	0	8811	3	$26,434
TOTAL						$359,065

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

There are no capital and startup costs for ICR since there are no new sources. See Table 3 for an explanation of O&M costs. The total O&M costs for this ICR are the totals of column G.

6(c) Estimating Agency Burden and Costs

The only costs to the Agency are those 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 and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is shown in Table 2, attached.

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

Managerial	$56.02	(GS-13, Step 5, $35.01 x 1.6)
Technical	$41.57	(GS-12, Step 1, $25.98 x 1.6)
Clerical	$22.50	(GS-6, Step 3, $14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2004 General Schedule”

which excludes locality rates of pay.

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

Since there are no new sources to average over the three years covered by this ICR, the number of respondents is the simple arithmetic sum of respondents for each of the source categories or 72.

The total number of annual responses per year is calculated using Table 1. The total annual labor cost is determined from Table 1. The average annual Agency burden and cost over next three years is shown in Table 2.

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.

(i) Respondent Tally

The Total Hours Requested is 13,533. The annual labor costs are $1,080,150. Details regarding these estimates may be found in Table 1. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 90 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $359,065. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Cost.

(ii) The Agency Tally

The average annual Agency burden hours and cost over next three years is shown in Tables 2.

6(f) Reasons for Change in Burden

There is no change in burden from the most recently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 90 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2008-0433. 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0433 and OMB Control Number 2060-0489 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 Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	Hours/Occurrence (A)	Occurrences/Year (B)	Hours/Year (C)	Respondents/Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
1. APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. REPORTING REQUIREMENTS								
a. Read Instructions	1	1	1	0	0.0	0.0	0.0	$0.00
b. Required Activities								
Initial Performance Tests	57	1	57	0	0.0	0.0	0.0	$0.00
Repeat of Performance Tests	57	0.1	5.7	0	0.0	0.0	0.0	$0.00
Periodic Performance Tests	40	1.2	48	43.2	2073.6	103.7	207.4	$190,326.41
Repeat of Performance Tests	40	0.2	8	43.2	345.6	17.3	34.6	$31,721.07
Startup, Shutdown and Malfunction Plan	40	1	40	72	2880.0	144.0	288.0	$264,342.24
Operations and Maintenance Plan	40	1	40	72	2880.0	144.0	288.0	$264,342.24
Visual Emissions and Opacity Monitoring	0.1	13	1.3	72	93.6	4.7	9.4	$8,591.12
c. Create Information	----------Included in 3b----------							$0.00
d. Gather Existing Information	----------Included in 3b----------							$0.00
e. Write Report								
Notification of Applicability	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Construction/Reconstruction	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Actual Startup	2	1	2	0	0.0	0.0	0.0	$0.00
Request for Extension of Compliance	2	1	2	0	0.0	0.0	0.0	$0.00

Notification of Special Compliance Requirements	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Performance Test	2	1.5	3	43.2	129.6	6.5	13.0	$11,895.40
Notification of Opacity and Visible Emissions Observation	2	1.5	3	43.2	129.6	6.5	13.0	$11,895.40
Notification of the Continuous Emission Monitor Performance Evaluation	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Compliance Status	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Adjustments to Time Periods or Postmark Deadlines for Submittal and Review of Required Communications	2	1	2	0	0.0	0.0	0.0	$0.00
Notification of Change in Information Already Provided	2	1	2	0	0.0	0.0	0.0	$0.00
Report of Initial Performance Tests	8	1.1	8.8	0	0.0	0.0	0.0	$0.00
Report of Periodic Performance Tests	8	1.5	12	43.2	518.4	25.9	51.8	$47,581.60
Opacity and Visible Emissions Observations	----------Included in 3b----------							$0.00
Reporting Results of Continuous Monitoring System Performance Report and Summary Report	----------Included in 3b----------							$0.00
Progress Reports	8	2	16	0	0.0	0.0	0.0	$0.00
Excess Emissions and Continuous Monitoring System Performance Report and Summary	8	3	24	72	1728.0	86.4	172.8	$158,605.34

Report								
Periodic Startup, Shutdown, Malfunction Report	----------Included in Excess Emissions Report----------							$0.00
Immediate Startup, Shutdown, Malfunction Reports	4	2	8	3.4	27.2	1.4	2.7	$2,496.57
Request for Waiver of Reporting and Recordkeeping	4	1	4	0	0.0	0.0	0.0	$0.00
4. RECORDKEEPING REQUIREMENTS								
a. Read Instructions	----------Included in 3b----------							$0.00
b. Plan Activities	----------Included in 3b----------							$0.00
c. Implement Activities	----------Included in 3b----------							$0.00
d. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e. Time to Enter Information								
Records of All Information Required by Standards	0.25	53	13.37	72	962.6	48.1	96.3	$88,351.44
f. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
g. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SUBTOTAL ANNUAL BURDEN					**11,768.2**	**588.4**	**1,176.8**	**$1,080,149**
GRAND TOTAL					**13533 (rounded)**			

Assumptions	
Number of affected facilities	72[1]
Time required to read instructions (hours)	1

Time required to complete performance test (hours)	57
Periodic performance test (hours)	40
Performance test reports (hours)	8
Rate of failed performance tests (repeat)	10%
Periodic performance tests (every five years and every 30 minutes) = 60%	43.2
Estimated hours to prepare the Startup/Shutdown/Malfunction	40
Time required to conduct visual and opacity monitoring	0.1
Estimated number of sources at an affected facility that require visual emissions and opacity	72
Time required to prepare notifications (hours)	2
Number of new facilities (per year)	0
Time required to prepare progress reports (hours)	8
Time required to prepare excess emissions reports (hours)	8
Time required to prepare immediate startup, shudtdown, and malfunction reports (hours)	4
Time required to file information required by standard (hours)	0.25
Technical labor rate	$82.74
Managerial labor rate	$96.41
Clerical labor rate	$42.25

[1] Affected facilities consist of 18 manufacturing carbon black, 14 manufacturing cyanide, 37 manufacturing ethylene, and 3 manufacturing spandex.

Table 2: Annual Agency Burden and Cost
NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY)
(Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (A)	Occurances/Plant/Year (B)	EPA Hours/Year (C=A*B) (C)	Plants/Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
INITIAL PERFORMANCE TESTS								
New or Modified Facility	5	1	5	0	0	0	0	$0.00
Repeat of Performance Tests	5	0.1	0.5	0	0	0	0	$0.00
PERIODIC PERFORMANCE TESTS								
Existing Facility	5	1	5	43.2	216	11	22	$10,070.14
Repeat of Performance Tests	5	0.1	0.5	4.3	2	0	0	$100.24
REPORT REVIEW								
Notification of Applicability	2	1	2	0	0	0	0	$0.00
Notification of Construction/Reconstruction	2	1	2	0	0	0	0	$0.00
Notification of Actual Startup	2	1	2	0	0	0	0	$0.00
Request for Extension of Compliance	2	1	2	0	0	0	0	$0.00
Notification of Special Compliance Requirements	2	1	2	0	0	0	0	$0.00
Notification of Performance Test	2	1.1	2.2	43.2	95	4.752	9.504	$4,430.86
Notification of Opacity and Visible Emissions Observation	2	1	2	43.2	86	4.32	8.64	$4,028.05
Notification of the Continuous Emission Monitor Performance	2	1	2	0	0	0	0	$0.00

	Evaluation								
	Notification of Compliance Status	2	1	2	0	0	0	0	$0.00
	Notification of Adjustments to Time Periods or Postmark Deadlines for Submittal and Review of Required Communications	2	1	2	0	0	0	0	$0.00
	Notification of Change in Information Already Provided	2	1	2	0	0	0	0	$0.00
	Review Operations and Maintenance Plan	40	1	40	0	0	0	0	$0.00
	Review Report of Initial Performance Test	5	1.1	5.5	0	0	0	0	$0.00
	Review Report of Periodic Performance Test	5	1.1	5.5	43.2	238	11.88	23.76	$11,077.15
	Review Opacity and Visual Emission Observation Report	----------Included in Review of Performance Test Report----------							$0.00
	Review Reporting Results of Continuous Monitoring System Performance Report and Summary Report	----------Included in Review of Performance Test Report----------							$0.00
	Review Progress Reports	----------Included in Review of Performance Test Report----------							$0.00
	Review Excess Emission Report	20	2	40	72	2880	144	288	$134,268.48

	and Continuous Monitoring System Performance Report and Summary Report							
	Review Periodic Startup, Shutdown, Malfunction Report	----------Included in Review of Performance Test Report----------						$0.00
	Review Immediate Startup, Shutdown, Malfunction Report	8	1	8	3.4	27.2	1.36	2.72	$1,268.09
	Review Request for Waiver of Reporting and Recordkeeping	2	1	2	0	0	0	0	$0.00
TOTAL ANNUAL BURDEN						3,544	177	354	$165,243
						4,075			

Assumptions	
Number of affected facilities	72[1]
Time required to review notifications (hours)	2
Time required to oversee performance test (hours)	5

Time required to review performance test report (hours)	5
Rate of failed performance tests (repeat)	10%
Periodic performance tests (every five years and every 30 minutes) = 60%	43.2
Estimated number of performance tests per facility	10
Operations and Maintenance Plan (hours)	40
Time required to review Excess Emissions Repot, Continuous Monitoring Reports, and Summary Reports (hours)	20
Estimated number of immediate startup/shutdown/malfunction reports submitted to EPA (per facility)	5
Time required to review the immediate startup/shutdown/malfunction report (hours)	8
Time required to review existing plant emission reports (hours)	4
EPA Managerial Labor rate	$56.02
EPA Technical Labor rate	$41.57
EPA Clerical Labor rate	$22.50

[1] Affected facilities consist of 18 manufacturing carbon black, 14 manufacturing cyanide, 37 manufacturing ethylene, and 3 manufacturing spandex.