**SUPPORTING STATEMENT**
**ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM)**

## 1. Identification of the Information Collection

### 1(a) Title of the Information Collection

NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR part 63, subpart MMMMM) (Renewal), EPA ICR 2027.04, OMB Control Number 2060-0516

### 1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Fabrication were proposed on August 8, 2001 (66 FR 41729), and promulgated on April 14, 2003 (68 FR 18062). These regulations apply to each existing, new, or reconstructed affected source at facilities engaged in flexible polyurethane foam fabrication. For the purpose of the rule, flexible polyurethane foam fabrication is further divided in the following two subcategories: 1) loop slitter adhesive use, and 2) flame lamination. This information is being collected to assure compliance with 40 CFR part 63, subpart MMMMM.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. An annual summary report is also required.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

An average of 11 respondents will be subject to the regulation over the period covered by this ICR. It is estimated that one additional respondent per year will become subject to the regulation in the next three years. Flexible polyurethane foam fabrication is divided into two subcategories: 1) loop slitter adhesive use, and 2) flame lamination. All of the nine respondents are flame lamination sources, with an anticipation of one additional respondent per year over the

three years of this ICR. There is no loop slitter facility that would be subject to the regulation. Over the next three years, the average number of respondents will be eleven.

The Office of Management and Budget (OMB) approved the current Information Collection Request (ICR) without any "Terms of Clearance."

The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal), attached.

The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Table 2: Average Annual EPA Burden – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal), attached.

## 2. Need for and Use of the Collection

### 2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

> (A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, particulate matter emissions from facilities in flexible polyurethane foam fabrication cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for the source category at 40 CFR part 63, subpart MMMMM.

**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 test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the 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 check if 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.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart MMMMM.

**3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

**3(c) Consultations**

For the information collection, we previously referenced the most recent ICR, consulted

with the preparer of the active ICR, and used other resources to obtain the most recent data available. Information available from the United States Census Bureau, the Air Facility System (AFS), and websites covering flexible polyurethane foam fabrication was also reviewed.

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

**3(d) Effects of Less Frequent Collection**

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

**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. The 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 would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years

**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 3999, September 8, 1978; 43 FR 42251, September 28, 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 flexible for the respondents affected by the standards is SIC 3086, which corresponds to the North American Industry Classification System (NAICS) code 326150 for "Urethane and Other Foam Products (except Polystyrene) Manufacturing."

### 4(b) Information Requested

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

#### (i) Data Items

All data in this ICR that are recorded and/or reported are required by NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR part 63, subpart MMMMM).

A source must make the following reports:

| Notifications | Standard Citation by Sections |
|---|---|
| Initial notification | 63.9(b), 63.8816(b) |
| Notification of construction/reconstruction | 63.9(b)(1)(iii), 63.8816.(c) |
| Notification of performance test | 63.9(e), 63.8816(d) |
| Notification of compliance status | 63.9(h)(2)(ii), 63.8816(e) |
| First compliance report | 63.8818(b)(1) |
| Semiannual compliance report | 63.8818(b)(3) |
| Annual compliance report | 63.8818(c) |
| SSM report | 63.10(d)(5)(i), 63.8818(f)(1) |

A source must make the following reports:

| Recordkeeping | |
|---|---|
| Record of startup, shutdown, and malfunctions | 63.10(b)(1), 63.8820(a) |
| Records are required to be retained for five years | 63.10(b)(2) |

Electronic Reporting

At the present, respondents are using 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 10 percent of the respondents use electronic reporting.

**(ii) Respondent Activities**

| Respondent Activities |
|---|
| Read instructions. |
| Perform initial performance test, Reference Method 311 test, and repeat performance tests if necessary. |
| Write the notifications and reports listed above. |
| Enter information required to be recorded above. |
| Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information. |
| Train personnel to be able to respond to a collection of information. |
| Transmit, or otherwise disclose the information. |

Currently, sources are using automated monitoring equipment that provides parameter data. Although personnel at the sources 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, and excess emissions |

| Agency Activities |
|---|
| reports, required to be submitted by industry. |
| Audit facility records. |
| Input, analyze, and maintain data in the Air Facility System (AFS). |

**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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and

published for use in compliance and enforcement programs

Information contained in the reports is entered into the 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 its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

**5(c) Small Entity Flexibility**

A 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. The number of small entities affected by this rule could not be determined, based on review of the promulgated rule notice in the Federal Register and a search of publicly available current data sources.

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 requirements the minimum 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 Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal).

## 6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for 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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory. The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### 6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 12,303 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of this 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 | $97.46 | ($46.41 + 110%) |
| Technical | $83.71 | ($39.86 + 110%) |
| Clerical | $42.55 | ($20.26 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are 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) |
| Differential pressure, pH, liquid flow rate, data recorder | $997 | 1 | $997 | $1,674 | 1 | $1,674 |

The total capital/startup costs for this ICR are $997. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $1,674. 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 $2,671.

**6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emission, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $58,836. 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) “2005 General Schedule” which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 11 existing respondents will be subject to the standard. It is estimated that one additional

respondent per year will become subject. The overall average number of respondents, as shown in the table below is 11 per year.

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

| Number of Respondents | | | | | |
|---|---|---|---|---|---|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
| Year | (A) Number of New Respondents | (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 | 9 | 0 | 0 | 10 |
| 2 | 1 | 10 | 0 | 0 | 11 |
| 3 | 1 | 11 | 0 | 0 | 12 |
| Average | 1 | 10 | 0 | 0 | 11 |

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 11.

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

| Total Annual Responses | | | | |
|---|---|---|---|---|
| (A) Information Collection Activity | (B) Number of Respondents | (C) Number of Responses | (D) Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E) Total Annual Responses E=(BxC)+D |
| Initial notification | 1 | 1 | 0 | 1 |
| Application of construction | 1 | 1 | 0 | 1 |
| Notification of performance test | 1 | 1 | 0 | 1 |
| Notification of compliance status | 1 | 1 | 0 | 1 |
| First compliance report | 1 | 1 | 0 | 1 |
| Semiannual compliance report | 11 | 2 | 0 | 22 |
| SSM report | 11 | 10 | 0 | 110 |
| | | | Total | 137 |

The number of Total Annual Responses is 137.

**6(e) Bottom Line Burden Hours Burden 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 $1,002,163. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR part 63, subpart MMMMM) (Renewal), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 89 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $3,000. 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 1,451 labor hours at a cost of $58,836. See Table 2: Annual Agency Burden and Cost, NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR part 63, subpart MMMMM) (Renewal), attached.

**6(f) Reasons for Change in Burden**

There is no change in the labor hours or cost to the respondents 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 respondents is very low, negative, or non-existent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. Apparent differences of less than 500 hours are attributable to rounding; in previous years, hours were rounded to the nearest thousand; this ICR presents more exact figures.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 89 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-2008-0371. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0371 and OMB Control Number 2060-0516 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 Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal)**

| Burden item | (A) Person-hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person-hours per respondent per year (C=AxB) | (D) Respondents per year [a] | (E) Technical person-hours per year (E=CxD) | (F) Management person-hours per year (Ex0.05) | (G) Clerical person-hours per year (Ex0.1) | (H) Cost, $ [b] |
|---|---|---|---|---|---|---|---|---|
| 1. Reporting Requirements | | | | | | | | |
| a. Read instructions [c] | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $371.35 |
| b. Gather information [c] | 4 | 1 | 4 | 11 | 44 | 2.2 | 4.4 | $4,084.87 |
| c. Reports | | | | | | | | |
| i. Initial notification [c] | 2 | 1 | 2 | 1 | 2 | 0.1 | 0.2 | $185.68 |
| ii. Application for construction for new sources [c] | 2 | 1 | 2 | 1 | 2 | 0.1 | 0.2 | $185.68 |
| iii. Notification of performance test [c, d] | 2 | 1 | 2 | 1 | 2 | 0.1 | 0.2 | $185.68 |
| iv. Notification of compliance status [c] | 20 | 1 | 20 | 1 | 20 | 1 | 2 | $1,856.76 |
| v. First compliance report [c] | 8 | 1 | 8 | 1 | 8 | 0.4 | 0.8 | $742.70 |
| vi. Semiannual compliance report [d] | 4 | 2 | 8 | 11 | 88 | 4.4 | 8.8 | $8,169.74 |
| vii. Annual compliance report [e] | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0 |
| viii. SSM report | 2 | 10 | 20 | 11 | 220 | 11 | 22 | $29,424.36 |
| SUBTOTAL Reporting | | | | | | 448.5 | | $45,206.82 |
| 4. Recordkeeping requirements | | | | | | | | |
| a. Plan activities [c] | 10 | 1 | 10 | 1 | 10 | 0.5 | 1 | $928.38 |
| b. Implement activities for Flame Lamination | | | | | | | | |
| i. Record SSM | 1 | 100 | 100 | 11 | 1,100 | 55 | 110 | $102,121.80 |
| ii. Conduct performance test [c, f] | 50 | 1 | 50 | 1 | 50 | 2.5 | 5 | $4,641.90 |
| iii. Record CPMS measurements | 2 | 300 | 600 | 11 | 6,600 | 330 | 660 | $612,712.80 |
| iv. CPMS calibration and | 4 | 50 | 200 | 11 | 2,200 | 110 | 220 | $204,243.60 |

| 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] |
|---|---|---|---|---|---|---|---|---|
| maintenance | | | | | | | | |
| c. Implement activities for Loop Slitters | | | | | | | | |
| i. Record adhesives used and suppliers | 1 | 1 | 1 | 0 | 0 | 0 | 0 | $0 |
| ii. Conduct Method 311 test | 4 | 1 | 4 | 0 | 0 | 0 | 0 | $0 |
| d. Develop record system | | | | | | | | |
| i. SSM plan [c, d] | 40 | 1 | 40 | 1 | 40 | 2 | 4 | $3,713.52 |
| ii. Continuous parameter monitoring system (CPMS) maintenance plan [c, d] | 20 | 1 | 20 | 1 | 20 | 1 | 2 | $1,856.76 |
| e. Time to train personnel | | | | | | | | |
| i. CPMS acquisition and installation [c, d] | 20 | 1 | 20 | 1 | 20 | 1 | 2 | $1,856.76 |
| ii. CPMS inspection and monitoring [c, d] | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $371.35 |
| f. Store, file, and maintain all records | 1 | 12 | 12 | 11 | 132 | 6.6 | 13.2 | $12,254.62 |
| g. Retrieve records/reports | 1 | 12 | 12 | 11 | 132 | 6.6 | 13.2 | $12,254.62 |
| SUBTOTAL Recordkeeping | | | | | | 11,854.2 | | $956,956.11 |
| Subtotals Labor Burden and Cost | | | | | 10,698 | 534.9 | 1,069.8 | $1,002,162.93 |
| **TOTAL LABOR BURDEN AND COST (rounded)** | | | | | | 12,303 | | $1,002,163 |

**Assumptions:**

[a] We have assumed that the average number of respondents that will be subject to the rule will be 11. There will be one additional new source (flame lamination) that will become subject to the rule over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $97.46 per hour for Executive, Administrative, and Managerial labor; $83.71 per hour for Technical labor, and $42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by Occupational and Iindustry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

[c] This is a one-time activity for each facility.

[d] This applies to flame lamination facilities.

[e] This applies to loop slitter adhesive use facilities.

[f] It also includes writing site-specific test plan.

**Table 2: Average Annual EPA Burden - NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart MMMMM) (Renewal)**

| 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] |
|---|---|---|---|---|---|---|---|---|
| 1. Review initial notification [c] | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $186.48 |
| 2. Review application for construction [c] | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $186.48 |
| 3. Review notification of compliance status [c] | 20 | 1 | 20 | 1 | 20 | 1 | 2 | $932.42 |
| 4. Review initial compliance report [c, d] | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0 |
| 5. Review initial compliance report [c, e] | 20 | 1 | 20 | 1 | 20 | 1 | 2 | $932.42 |
| 6. Review notification of performance test [c, d] | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $186.48 |
| 7. Review annual compliance report [d] | 1 | 1 | 1 | 0 | 0 | 0 | 0 | $0 |
| 8. Review semiannual compliance report [e] | 15 | 2 | 30 | 11 | 330 | 16.5 | 33 | $15,384.93 |
| 9. Review startup, shutdown, malfunction report [e] | 8 | 10 | 80 | 11 | 880 | 44 | 88 | $41,026.48 |
| **TOTAL ANNUAL BURDEN AND COST (rounded)** | | | | | 1,451 | | | $58,836 |

**Assumptions:**

[a] We have assumed that the average number of respondents subject to the rule will be 11. There are nine flame lamination facilities that are currently subject to the regulation and it is estimated that one additional respondent per year will be subject to the requirements over the three-year period of this ICR. There are no loop slitters that are considered major sources that would be subject to the rule.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of $56.02 (GS-13, Step 5, $35.01 x 1.6), Technical rate of $41.57 (GS-12, Step 1, $25.98 x 1.6), and Clerical rate of $22.50 (GS-6, Step 3, $14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

[c] This is a one-time activity performed once per facility.

[d] This applies only to loop slitter adhesive use facilities.

[e] This applies only to flame lamination facilities.