

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Manufacture of Amino/Phenolic Resins (40CFR Part 63, Subpart OOO)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)  
(Renewal), EPA ICR Number 1869.06, OMB Control Number 2060-0434

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Amino/Phenolic Resins were proposed on December 14, 1998, and promulgated on January 20, 2000. These standards apply to existing and new facilities that engage in the manufacture of amino/phenolic resins. New facilities include those that commenced construction or reconstruction after the date of the proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart OOO.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators 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 sources subject to NESHAP.

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

Approximately 40 sources are currently subject to the regulation, and it is estimated that no additional sources are expected to become subject to the standard in the next three years.

The Office of Management and Budget (OMB) approve the currently active Information Collection Request (ICR) with the following "Terms of Clearance":

The burden and cost assumptions and calculations for the respondents and the agency should be updated in the next renewal.

EPA has addressed each item of concern in the TOC by updating respondent assumptions using September 2009 labor rates from the United States Department of Labor, Bureau of Labor

Statistics. Agency assumptions were updated using the Office of Personnel Management (OPM), 2010 General Schedule for Agency labor. Respondent and Agency cost assumptions are provided in Sections 6(b)(i) and 6(c).

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal). The burden to the “Federal government” is attributed entirely to work performed by Federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden - NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

## **2. Need for and Use of the Collection**

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

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAPs). These standards are applicable to new or existing sources of HAPs 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 manufacture of amino/phenolic resins 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 OOO.

### **2(b) Practical Utility/Users of the Data**

The control of emissions of pollutants from amino/phenolic resins manufacturing operations requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of formaldehyde, methanol, and phenol from amino/phenolic resins manufacturing operations are the result of operation of the affected facilities. The subject standards are achieved by the capture of formaldehyde, methanol, and

phenol using scrubbers or other compliance options and/or leak detection and repair procedures.

The notifications required in the applicable regulations 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 regulations are being met. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the (monitoring, recordkeeping and reporting) requirement described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart 000.

#### **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 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 (74 FR 32583) on July 8, 2009. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Air Facility System (AFS) which is operated and maintained by the EPA Office of Compliance. AFS is the Agency's 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. In consultation with the Agency's industry experts and the AFS databases, we have determined that there has been no growth in the number of respondents since the last ICR.

During a previous renewal of this ICR, industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. It is our policy to review any comments received since the last ICR renewal and to respond appropriately. This review includes 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 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 affected facilities 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. Also, 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. 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**

The required information has been determined not to be confidential. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of amino/phenolic resins manufacturing operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard, which corresponds to the North American Industry Classification System (NAICS) code, are listed below for source description.

<b>Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)</b>	<b>SIC Code</b>	<b>NAICS Code</b>
Plastics Material and Resin Manufacturing	2821	325211

##### 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

All data in this ICR that is recorded and/or reported is required by National Emission Standards for Hazardous Air Pollutants for the Manufacture of Amino/Phenolic Resins (40 CFR part 63, subpart OOO).

A source must make the following reports:

<b>Reports for 40 CFR Part 63, Subpart OOO</b>	
Notification of intent to construct or reconstruct	63.05, 63.1417(d)
Notification and report of construction date	63.05, 63.1400(j)
Notification of anticipated startup	63.05, 63.1400(j)
Actual startup notification	63.05, 63.1400(j)
Notification of modification	63.05, 63.1400(j)
Notification and report of performance tests and results	63.07 (b), 63.1417(e)
Pre-compliance report	63.1417(d)
Notification and report of compliance status	63.1417(e)
Periodic reports (semiannual) including statement of compliance (if no exceedances occurred), daily, hatch cycle, and block average monitoring data for any periods where exceedances or excursions occur, periods of monitoring system downtime.	63.1417(f)
Quarterly reports upon request of the Administrator	63.1416(f)(2)

<b>Reports for 40 CFR Part 63, Subpart OOO</b>	
Develop startup, shutdown, malfunction plan	63.6(e)(3), 63.10(d)(5), 63.1417(g)
Notification of storage vessel inspection	63.1417(h)(1)
Site-specific test plan	63.1417(h)(2)
Notification of planned performance test	63.1417(h)(3)
Notification of change in primary product	63.1417(h)(4), 63.1400(g)(7-8)
Notification of added emission points	63.1417(h)(5)
Notification that a small control device has been re-designated as a large control device.	63.1417(h)(6)
Notification of process change	63.1417(h)(7)

A source must keep the following records:

<b>Recordkeeping for 40 CFR Part 63, Subpart T</b>	
Five-year retention of records	63.1416(a)
Records of monitored values, maintenance, startup, shutdown, malfunction	63.1416(b), 63.6
Monitoring records	63.1416(c)
Batch process vent records	63.1416(d)
Aggregate batch vent stream records	63.1416(e)
Continuous process vent records	63.1416(f)
Other records or documentation	63.1416(g)
Reduced recordkeeping program	63.1416(h)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate compliance monitoring system (CMS) for pH, flow, temperature, or specific gravity, or organic monitoring device for control options as applicable.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 308, 316, or 320 tests as applicable 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.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Transmit, or otherwise disclose the information.

**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.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, startup, shutdown, malfunction plan, and quality control plan for CMS 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 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 100,000 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 or operator for five years.

### **5(c) Small Entity Flexibility**

A majority of the affected facilities are primarily small entities (e.g., small businesses). According to the Final Rule (65 FR 3276):

We have determined that, of the twenty affected firms, only six are small businesses . . . . Although this final rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has tried to reduce the impact of this rule on small entities. In order to minimize the impact of the rule for leaking equipment, we have exempted firms producing less than 881 tpy (800 Mg/yr) from complying with the requirements to have a leak detection and repair program.

Therefore, this ICR estimates approximately 30 percent of respondents, or 12 of the 40 respondents, may be small entities. Due to technical considerations involving the process operations and the type 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.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR part 63, subpart OOO) (Renewal).

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

Table 1 document 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 24,044 (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	\$114.49 (\$54.52 + 110%)
Technical	\$98.20 (\$46.76 + 110%)
Clerical	\$48.53 (\$23.11 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "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**

This section covers the costs associated with all types of continuous monitoring equipment (e.g., continuous emission monitoring system (CEMS) and continuous parameter monitors). The types of industry cost associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
pH Monitor	\$1,000	0	0	\$300	40	\$12,000
Liquid Flow Monitor	\$500	0	0	\$100	40	\$4,000

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

The total operation and maintenance (O&M) costs for this ICR are \$16,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$16,000.

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

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

The average annual Agency cost during the three years of the ICR is estimated to be \$19,071.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 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. [These rates can be obtained from the OPM web site: <http://www.opm.gov/oca/payrates/index/htm>.] Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

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

Based on our research for this ICR, there are approximately forty existing sources currently subject to the standard. It is estimated that no additional sources per year will become subject to the regulation in the next three years.

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

<b>Number of Respondents</b>					
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	0	40	0	0	40
2	0	40	0	0	40
3	0	40	0	0	40
Average	0	40	0	0	40

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 40.

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

<b>Respondent Universe and Number of Responses Per Year</b>						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(Cx D)+F
40 CFR part 63, subpart OOO	0	5	40	2.05	0	82

The number of total respondents is 40. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 82. This is the number in column E of the Respondent Universe and Number of Responses per Year table above.

The total annual labor costs are \$2,274,320. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost, NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR part 63, subpart OOO) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$16,000. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

### **6(e) Bottom Line Burden Hours Burden Hours and Cost Tables**

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 293 hours per response.

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

There is no change in the respondent labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the respondents is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

The increase in cost to Respondents and the Agency is due to labor rate adjustments to reflect the most recent available estimates.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 293 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-2009-0397, which is available for on line viewing at [www.regulations.gov](http://www.regulations.gov), or in person 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, D.C. 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 is (202) 566-1752. An electronic version of the public docket is available online at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0397 and OMB Control Number 2060-0434 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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)**

Burden item	(A) Respondent Hours Per Occurrence	(B) Number of Occurrences per Respondent per year	(C) Hours per Respondent Per Year (C=AxB)	(D) Number of Respondents per Year <sup>c</sup>	(E) Technical Hours Per Year @\$98.20	(F) Managerial Hours Per Year @\$114.49 (E x 0.05)	(G) Clerical Hours per Year @ \$48.53 (E x 0.1)	(H) Total Hours per Year	(I) Total Cost Per Year <sup>a</sup>
1. Applications	N/A								
2. Survey and Studies	N/A								
3. Reporting Requirements									
Read instructions <sup>d</sup>	16	1	16	40	640	32	64	736	\$69,617.60
Plan activities	8	1	8	40	320	16	32	368	\$34,808.80
Training	16	1	16	40	640	32	64	736	\$69,617.60
Create, test and research development <sup>e, f</sup>	320	1	320	2	640	32	64	736	\$69,617.60
Gather, monitor and inspect information	208	1	208	40	8,320	416	832	9568	\$905,028.80
Process, compile and review	48	2	96	40	3,840	192	384	4416	\$417,705.60
Complete reports <sup>g</sup>	40	2	80	40	3,200	160	320	3680	\$348,088.00
Record/disclose information	16	2	32	40	1,280	64	128	1472	\$139,235.20
Store, file, maintain information <sup>h</sup>	4	2	8	40	320	16	32	368	\$34,808.80
Leak detection and repair (LDAR) reporting <sup>i</sup>	60	1	60	25	1,500	75	150	1725	\$163,166.25
<i>Subtotal Reporting</i>								23,805	\$2,251,694
4. Recordkeeping Requirements									
Leak detection and repair (LDAR) recordkeeping <sup>j</sup>	104	1	104	2	208	10.4	20.8	239	\$22,625.72
<i>Subtotal Recordkeeping</i>								239	\$22,626
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>								<b>24,044</b>	<b>\$2,274,320</b>

**Assumptions:**

- a. We assume a technical labor rate of \$98.20, managerial rate \$114.49, and clerical rate of \$48.53 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1: Total compensation. The wage rate obtained from the table has been increased by 110 percent.
- b. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- c. We have assume that there are 40 affected sources with no new, modified or reconstructed facility expected to be constructed over the next three years.
- d. We assume that it will take 16 hours for each respondent to read instructions.
- e. Initial performance testing was assumed to take 280 technical hours (1 test leader for two weeks and 5 feet crew for one week), with an additional 40 hours for the establishment of parameter monitoring levels for a total of 320 respondent hours per occurrence.
- f. We assume that 5 percent of the initial tests will be repeated during each successive year.
- g. We assume that it will take each respondent 40 hours two times per year to complete reports (semiannual reporting).
- h. We assume that it will take 4 hours two times per year to gather monitoring information and maintain monitoring equipment.
- i. We assume that there are 27 affected sources that will be required to comply with the equipment leaks LDAR program; 25 have less than 500 components and two have more than 500 components. The typical affected source has four reactor batch process vents, three non-reactor batch process vents, and no affected storage vessels or heat exchange systems.

**Table 2: Average Annual EPA Burden - NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)**

Activity	(A) Person-hours per Activity	(B) Number of activities per Year	(C) Technical person- hours per Year \$46.21/hr (C=AxB) <sup>c</sup>	(D) Managerial person-hours per Year \$62.27/hr (D=Cx0.05) <sup>b</sup>	(E) Clerical person- hours per Year \$25.01/hr (E=Cx0.1) <sup>b</sup>	(F) <sup>a</sup> EPA Cost Per Year
Initial performance test	N/A					
Repeat performance test <sup>d</sup>	20	2	40	2	4	\$2,072.98
Report review						
a) Notification of construction/reconstruction	N/A					
b) Notification of anticipated startup	N/A					
c) Notification of actual startup	N/A					
d) Notification of modification	N/A					
e) Notification of compliance status	N/A					
f) Notification of performance test <sup>e</sup>	4	2	8	0.4	0.8	\$414.60
g) Notification of process change	N/A					
h) Notification of inspection of storage vessel	N/A					
i) Notification of change in primary product	N/A					
j) Pre-compliance report	N/A					
k) Storage vessel initial compliance demonstration	N/A					
l) Periodic reports of compliance status <sup>f</sup>	4	80	320	16	32	\$16,583.84
Subtotals Labor Burden and cost			368	18.4	36.8	\$19,071.42
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>				423		\$19,071

**Assumptions:**

a. We assume a technical labor rate of \$46.21, managerial rate \$62.27, and clerical rate of \$25.01 from the United States Department of Labor. These rates are from the Office of Personnel Management (OPM), 2010 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. These rates can be obtained from the OPM web site, <http://www.opm.gov/oca/payrates/index/htm>.

b. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.



- c. We assume that there are 40 affected sources with no new, modified or reconstructed facility expected to be constructed over the next three years.
- d. We assume that it would take 20 hours two times per year for respondents to complete repeat performance test.
- e. We assume that it will take four hours two times per year to review the notification of performance test report.
- f. We assume that it will take 4 hours 80 times per year to review the periodic reports of compliance status.