SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (Renewal), EPA ICR Number 2256.03, OMB Control Number 2060-0598

1(b) Short Characterization/Abstract

This ICR covers information collection requirements in the final area source rules for acrylic and modacrylic fibers production (40 CFR Part 63, Subpart LLLLLL), carbon black production (40 CFR Part 63, Subpart MMMMMM), chemical manufacturing: chromium compounds (40 CFR Part 63, Subpart NNNNNN), flexible polyurethane foam production and fabrication (40 CFR Part 63, Subpart OOOOOO), lead acid battery manufacturing (40 CFR Part 63, Subpart PPPPPP), and wood preserving (40 CFR Part 63, Subpart QQQQQQ).

The first type of potential respondents are either owners or operators of any existing or new acrylic or modacrylic fibers production plant that is an area source of hazardous air pollutants (HAP) emissions. The one existing area source is already subject to emissions limits and other requirements that are the same as those in this final NESHAP. These include numerical limits for acrylonitrile emissions from the control devices (packed column scrubbers) for polymerization process equipment (e.g., reactors, feed tanks) and monomer recovery process equipment such as polymer holding tanks; operating limits for the scrubbers; and requirements in 40 CFR Part 60, Subpart Kb pertaining to volatile organic liquids in acrylonitrile storage tanks. The final standards for new area source acrylic or modacrylic fibers production plants apply to process vents, fiber spinning lines, storage tanks, process and maintenance wastewater, and equipment leaks. These include numerical limits for acrylonitrile emissions from these sources and various testing, monitoring, and recordkeeping requirements. Compliance requirements for all sources include an initial notification of applicability, a notification of compliance status, and a startup shutdown malfunction (SSM) plan.

The second type of potential respondents is owners or operators of any existing or new carbon black production plant that is an area source of HAP emissions. There are no existing area sources. The final rule for existing sources includes requirements to reduce emissions from carbon black production units by using either a flare or by venting through a closed vent system

to a control device that reduces emissions by 98 weight-percent or to a HAP concentration of 20 Parts per million by volume (ppmv). Area sources are also required to monitor operating parameters specific to the type of control device being used. The requirements for new area source carbon black production plants are the same as those for existing plants. Compliance requirements include an initial notification, a notification of compliance status, periodic reports, and an SSM plan.

The third type of potential respondents is owners or operators of area source facilities that use chromite ore as the basic feedstock to manufacture chromium compounds, primarily sodium dichromate, chromic acid, and chromic oxide. There are only two plants in this area source category, and both are already subject to particulate matter (PM) control requirements that are the same as those in the final NESHAP. Sources will be subject to PM emissions limits and inspection and maintenance requirements specific to the type of control device. Compliance requirements include an initial notification of applicability, a notification of compliance status, and an SSM plan.

The fourth type of potential respondents is owners or operators of area source facilities that manufacture or fabricate flexible polyurethane foam. There are hundreds of plants in this area source category, but almost all of them have already discontinued use of the urban HAP of interest, methylene chloride . Use of materials containing methylene chloride is forbidden for mixhead flush; mold release agents; and equipment cleaning at slabstock, molded; and rebond foam production facilities. Foam fabrication facilities are forbidden to use adhesives containing methylene chloride. Compliance requirements for molded and rebond foam facilities, and foam fabrication facilities not operating loop slitters include only recordkeeping requirements. Compliance requirements for foam fabrication facilities operating loop slitters include a notification of compliance status. Emissions limits are established for HAP emissions from auxiliary blowing agents (ABA) used in production lines at slabstock foam production facilities, using a formula which takes into account the variable amount of ABA used to produce different grades of foam. Compliance requirements for slabstock foam facilities using no methylene chloride include a notification of compliance status. Compliance requirements for slabstock foam production facilities using HAP-containing ABA include an initial notification, a pre-compliance report, a notification of compliance status, semiannual reports, and an annual compliance certification. There are 500 respondents in this area source category.

The fifth type of potential respondents is owners or operators of any existing or new lead acid battery manufacturing facility that is an area source of HAP emissions. The 60 existing facilities are already subject to or able to meet the emission limits and other requirements of the new source performance standards (NSPS) for lead acid batteries in 40 CFR 60.372 of Subpart KK. The lead acid battery NSPS emission limits are the same as those in this NESHAP. These include numerical emissions limits for grid casting, paste mixing, three-process operation, lead oxide manufacturing, lead reclamation, and other lead emitting processes. This final NESHAP requires control by fabric filters for the paste mixing, three-process operation, lead oxide manufacturing, and other lead-emitting processes and by impingement scrubber for the grid casting and lead reclamation processes. The NESHAP adds the periodic monitoring and semi-annual inspection of fabric filters and the semi-annual reporting requirements found in State permits. The requirements for new area source lead acid battery manufacturing facilities are the

same as those for existing facilities. Compliance requirements include an initial notification, a notification of compliance status, performance testing if recent test reports are not available, periodic monitoring, semi-annual inspection of fabric filters, and semi-annual reporting.

The sixth type of potential respondents is owners or operators of area source facilities that use pressure or thermal processes to impregnate chemicals into wood to a depth that will provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. Existing facilities in the wood preserving source category are currently well controlled in terms of urban metal HAP emissions as a result of a voluntary decision by the industry to discontinue the consumer uses of chromated copper arsenate (CCA). All sources will be required to submit an initial notification, a notification of compliance status, and a compliance report within 30 days of a deviation from prohibitions. No other recordkeeping or reporting requirements in the General Provisions apply to facilities in this area source category. There are 393 respondents in this area source category.

New and existing area sources (except as specifically excluded) are subject to requirements in the General Provisions (40 CFR Part 63, Subpart A). An existing affected source would be required to submit an initial notification of applicability and a notification of compliance status. The owner or operator of an existing affected source is allowed to certify initial compliance based on previous performance test results; performance tests are required to demonstrate initial compliance for a new affected source The owner or operator of an existing affected source (except as specifically excluded) are also required to comply with the requirements for SSM plans and reports in 40 CFR 63.6(e)(3). All requirements in the General Provisions apply to the owner or operator of a new affected source.

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

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).

There is one existing acrylic and modacrylic fiber production area source facility. No new source is expected during the next 3 years. Consequently, the average number of respondents during the three-year period of this ICR is 0.33. There are no existing carbon black production area sources, and no new sources are expected during the next three years. Consequently the average number of respondents during the three-years of this ICR is 0. There are two existing chromium compound manufacturing area sources. No new sources are expected during the next three-years. Consequently, the average number of respondents during the three-years of this ICR is 0.67. There are approximately 500 existing flexible polyurethane foam production and fabrication area sources. No new sources are expected during the next three-years. Consequently, the average number of respondents during the three-year period of this ICR is 166.67. Also, 49 slabstock foam production area sources are subject to reporting requirements

(notification of compliance status) that the other foam facilities are not. The average number of respondents required to submit a notification of compliance status during the 3 year period of this ICR is 16.33 A single slabstock foam production plant which still uses methylene chloride is projected to have a higher burden that the other plants due to burden items resulting from additional rule requirements than the other plants due to burden items resulting from additional rule requirements. There are 60 existing lead acid battery manufacturing area sources. No new sources are expected during the next three-years. Consequently, the average number of respondents during the three-years of this ICR is 20. There are 393 existing wood preserving area sources. No new sources are expected during the next three-years. Consequently, the average number of respondents during the three-years of this ICR is 131.

The average number of respondents per year for all source categories is 319 (0.33 + 0 + 0.67 + 166.67 + 20 + 131 = 319)

All of the acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities in the United States are owned and operated by the acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving industry (the "Affected Public"). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the "Affected Public" is listed below in Table 1A thru 1E: Annual Respondent Burden and Cost - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (Renewal**)**. The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2A thru 2E: Average Annual EPA Burden - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (Renewal)**.**

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

(A) Establish and maintain such records; (B) make such reports;

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

In the Administrator's judgment, HAP emissions from acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving cause, or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for these area source categories.

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. In addition, the collected information is used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

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.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

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

The requested recordkeeping and reporting are required under acrylic and modacrylic fibers production (40 CFR Part 63, Subpart LLLLLL), carbon black production (40 CFR Part 63, Subpart MMMMMM), chemical manufacturing: chromium compounds (40 CFR Part 63, Subpart NNNNNN), flexible polyurethane foam production and fabrication (40 CFR Part 63, Subpart OOOOOO), lead acid battery manufacturing (40 CFR Part 63, Subpart PPPPPP), and wood preserving (40 CFR Part 63, Subpart QQQQQQ).

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 (75 FR 30812) June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. We contacted the Polyurethane Foam Association (PFA), at (865) 690-4648, the Flex-Foam Incorporated at (602) 252-5819, the Axion Power Battery, at (724) 654-9300, and the Treated Wood Council, at (202) 463-2045.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities. The North American Industry Classification System (NAICS) codes are listed below for each source category description.

Standards (40 CFR, part 63, subparts, LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ)	NAICS Codes
Acrylic or Modacrylic Fibers and Filaments Manufacturing	325222
Carbon Black Manufacturing	325182
Chromium Compounds	325188
Urethane and Other foam Products (except Polystyrene) Manufacturing	326150
Lead Acid Storage Batteries Manufacturing	335911

Standards (40 CFR, part 63, subparts, LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ)	NAICS Codes
Wood Preservation	321114

4(b) Information Requested

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

(i) Data Items

In this ICR, all the data recorded or reported is required by the NESHAP for acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving.

A source must make the following reports:

Acrylic and Modacrylic Fibers Production

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notification	63.9(g)
Notification of compliance status	63.11397(b), 63.11397(c), 63.9(h)
Notification of change in information	63.9(j)

Reports	
Monthly summary of monitoring data	63.11395(f), 63.11396(f)
Report of deviation	63.11395(g)
Quality assurance test plan	63.7(c)
CMS performance evaluations/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions report	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Information to demonstrate compliance	63.11395(g), 63,11396(f), 63.10(a)
Startup, shutdown, and malfunction	63.10(b)(2)

Recordkeeping	
Continuous parameter monitoring systems	61.10(c)(1), (c)(5-(c)(14)
Records should be retained for 5 years	63.11395(g), 63.10(b)(1)

Carbon Black Production

Notifications	
Initial notification	63.11402, 63.1110(c)(2)
Notification of construction/reconstruction	63.5(d), 63.11402, 63.1110(a)(6)
Notification of initial startup	63.11402, 63.1110(b)
Notification of performance test	63.11402, 63.1110(a), 63.999(a)
SSM plan	63.11402, 63.1111(a)
Notification of compliance status	63.11402, 63.1110(d)

Reports	
Initial/repeat performance tests	63.11402, 63.999(a)
SSM reports	63.11402, 63.1112(b)

A source must keep the following records:

Recordkeeping	
Monitoring information	63.11402, 63,1109, 63.998, 63.11
All other control devices	63.11402, 63.996
Records should be retained for 5 years	63.11395(g), 63.10(b)(1)

Chemical Manufacturing: Chromium Compounds

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of performance test	63.11410(i), 63.9(c)
Notification of compliance status	63.9(h)

Reports	
Semiannual monitoring report	63.11410(e), 63.999(a)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63..8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Monthly control device inspections	63.11410(d), 63,11410(h), 63.10

Flexible Polyurethane Foam Production and Fabrication

Notifications	
Notification of applicability	63.9(a)(2)
Notification of compliance status	63.9(h)

Reports	
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
SSM reports	63.6(e)(3)
CMS performance evaluation/report	63..8(e)(5)
Excess emissions reports	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Information used to demonstrate compliance	63.11416(f), 63.10

Lead Acid Battery Manufacturing

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.11417, 63.9(h)
Notification of changes of information	63.9(j)

Reports	
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63..8(e)(5)
Excess emissions reports	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Information used to demonstrate compliance	63.11423(b), 63.10

Wood Preserving

Notifications	
Notification of applicability	63.11430, 63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.11430, 63.9(h)
Notification of changes of information	63.9(j)

Reports	
Reports of deviation	63,11430
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63..8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Information used to demonstrate compliance	63.11423(b), 63.10

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that approximately no respondents are reporting electronically.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous parameter monitoring systems, control devices, bag leak detection system, pressure drop monitoring device, air scavenging systems
Perform initial performance test, Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 3, 3A, 3B, 5, 5D, test, and repeat performance test 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.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

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

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

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Tables 1A thru 1F: Annual Respondent Burden - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40CFR Part 63, Subparts **Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ)** (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. 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 could be found below in Tables 1A (for subpart LLLLLL), 1B (for subpart MMMMMM, 1C (for subpart NNNNNN), 1D (for subpart OOOOOO), 1E (for subpart PPPPPP), and 1F (for subpart QQQQQQ). 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

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

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) Cost

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 [1]	(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)
Fabric Filter for Lead Acid Battery	$4,840	0	$0	$0	0	$0
Total			$0			$0

[1] There are no new lead acid battery manufacturing expected during the next three-year period of this ICR

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

The total operation and maintenance (O&M) costs for this ICR are zero. 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 zero.

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 $51,561.

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. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, **Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ)** (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 319 respondents covering six different subparts will be subject to the standard. The overall average number of respondents as shown below is 319.

There is one existing acrylic and modacrylic fiber production area source facility. No new sources are expected during the next three years.

There are no existing carbon black production area sources, and no new sources are expected during the next three years.

There are two existing chromium compound manufacturing area sources. No new sources are expected during the next three years.

There are approximately 500 existing flexible polyurethane foam production and fabrication area sources. No new sources are expected during the next three years.

There are 60 existing lead acid battery manufacturing area sources. No new sources are expected during the next three years.

There are 393 existing wood preserving area sources. No new sources are expected during the next three years.

As shown above, the total number of Respondents over the three-year period of this ICR is 956. Consequently, the average number of respondents during the three-year period of this ICR is 319 (956/3 = 319)

The total number of annual responses is as follows:

The number of total annual responses for Subpart LLLLLL (acrylic and modacrylic fibers production area sources) is estimated as: (0.33 annual average respondents x 1 notification) + (0.33 annual average respondents x 1 notification) + (0.33 annual average respondents x 1 written plan). Therefore, the number of total annual responses is 1.

The number of total annual responses for Subpart MMMMMM (carbon black production area sources) is estimated at zero.

The number of total annual responses for Subpart NNNNNN (chemical manufacturing: chromium compounds area sources) is estimated as: (0.67 annual average respondents x 1 notification) + (0.67 annual average respondents x 1 notification) + (0.67 annual average respondents x 1 written plan). Therefore, the number of total annual responses is 2

The number of total annual responses for Subpart OOOOOO (flexible polyurethane foam production and fabrication area sources) is estimated as: (16.33 annual average respondents x 1 notification) + (0.33 annual average respondents x 5 notifications). Therefore, the number of total annual responses is 18.

The number of total annual responses for Subpart PPPPPP (lead acid battery manufacturing area sources) is estimated as: (20 annual average respondents x 1 notification) + (20 annual average respondents x 1 notification) + (5 annual average respondents x 1 performance test) + (6 annual average respondents x 2 semiannual reports). Therefore, the number of total annual responses is 57.

The number of total annual responses for Subpart QQQQQQ (wood preserving area sources) is estimated as: (131 annual average respondents x 1 notification) + (131 annual average respondents x 1 notification). Therefore, the number of total annual responses is 262.

The total number of responses for the combined source categories is 340.

The number of Total Annual Responses is 340.
The total annual labor costs are presented in Tables 1A, 1B, 1C, 1D, 1E, and 1F.

The total labor costs are $861. Details regarding these estimates may be found in Table 1A: Annual Respondent Burden and Cost - NESHAP for Area Source: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (Renewal)

The total labor costs are $0. Details regarding these estimates may be found in Table 1B: Annual Respondent Burden and Cost - NESHAP for Area Source: Carbon Black Production (40 CFR Part 63, Subpart MMMMMM) (Renewal).

The total labor costs are $18,767. Details regarding these estimates may be found in Table 1C: Annual Respondent Burden and Cost - NESHAP for Area Source: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (Renewal).

The total labor costs are $87,443. Details regarding these estimates may be found in Table 1D: Annual Respondent Burden and Cost - NESHAP for Area Source: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (Renewal).

The total labor costs are $192,703. Details regarding these estimates may be found in Table 1E: Annual Respondent Burden and Cost - NESHAP for Area Source: Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart PPPPPP) (Renewal).

The total labor costs are $99,749. Details regarding these estimates may be found in Table 1F: Annual Respondent Burden and Cost - NESHAP for Area Source: Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (Renewal).

The total cost of labor for all six categories listed above is $399,523.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 9. Details regarding these estimates may be found below in Table 1A: Annual Respondent Burden and Cost - NESHAP Area Source: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 9 hours per response.

The total annual labor hours are zero. Details regarding these estimates may be found

below in Table 1B: Annual Respondent Burden and Cost - NESHAP Area Source: Carbon Black Production (40 CFR Part 63, Subpart MMMMMM) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 0 hours per response.

The total annual labor hours are 198. Details regarding these estimates may be found below in Table 1C: Annual Respondent Burden and Cost - NESHAP Area Source: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 99 hours per response.

The total annual labor hours are 924. Details regarding these estimates may be found below in Table 1D: Annual Respondent Burden and Cost - NESHAP Area Source: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 hours per response.

The total annual labor hours are 2,048. Details regarding these estimates may be found below in Table 1E: Annual Respondent Burden and Cost - NESHAP Area Source: Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart PPPPPP) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 36 hours per response.

The total annual labor hours are 1,054. Details regarding these estimates may be found below in Table 1F: Annual Respondent Burden and Cost - NESHAP Area Source: Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 4 hours per response.

The total number of labor hours for all six categories listed above is 4,233.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are zero.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,144 labor hours at a cost of $51,561. See below Tables 2A, 2B, 2C, 2D, 2E, and 2F: Annual Agency Burden and Cost – NESHAP for Area Source: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (Renewal), Carbon Black Production (40 CFR Part 63, Subpart MMMMMM) (Renewal), Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (Renewal), Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (Renewal), Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart PPPPPP) (Renewal) and, Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease in the number of affected facilities due to a more accurate accounting of existing sources. This decrease is not due to any program changes.

There is an increase in the estimated labor burden hours and cost as currently identified in the OMB Inventory of Approved Burdens. The increase is due to a more accurate calculations, and the use of more recent labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours per response. The average annual burden for the final NESHAP for acrylic and modacrylic production area sources is estimated at 9 hours per response. The average annual burden for the final NESHAP for carbon black manufacturing area sources is estimated at zero hours per response. The average annual burden for the final NESHAP for chromium chemical compound production area sources is estimated at 99 hours per response. The average annual burden for the final NESHAP for flexible polyurethane production and fabrication area sources is estimated at 51 hours per response. The average annual burden for the final NESHAP for lead acid battery manufacturing area sources is estimated at 36 hours per response. The average annual burden for the final NESHAP for wood preserving area sources is estimated at 4 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-2010-0350. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public

Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0350 and OMB Control Number 2060-0598 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 1A: Annual Respondent Burden and Cost - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40CFR Part 63, Subpart LLLLLL) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	8	1	8	0.33	2.64	0.13	0.26	$286.75
B. Required activities								
Initial notification of applicability	4	1	4	0.33	1.32	0.07	0.13	$143.94
Notification of compliance status	8	1	8	0.33	2.64	0.13	0.26	$286.75
Startup, shutdown, malfunction plan	4	1	4	0.33	1.32	0.07	0.13	$143.94
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						9.12		
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data [c]	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel [c]	N/A							
G. Time for audits [c]	N/A							
Subtotal for Recordkeeping Requirements						0		
					7.92	0.4	0.8	$861.38
TOTAL LABOR BURDEN AND COST						9.12 9 (rounded)		$861

Assumptions:

[a] There is one existing acrylic and modacrylic production facility that is an area source. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 0.33 (1÷3=0.33).

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for

Clerical labor. 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.

[c] No hours or costs are associated with this item because the rule imposes no additional burden.

Table 1B: Annual Respondent Burden and Cost - NESHAP for Area Sources: Carbon Black Production (40CFR Part 63, Subpart MMMMMM) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	8	1	8	0	0	0	0	$
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	$0
Notification of compliance status	8	1	8	0	0	0	0	$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						0		
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		
					0	0	0	$0
TOTAL LABOR BURDEN AND COST						0		$0

Assumptions:

[a] There is zero existing carbon black production facility that is an area source. No new sources are projected during the 3-year term of this ICR.

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for Clerical labor. 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.

Table 1C: Annual Respondent Burden and Cost - NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	8	1	8	0.67	5.36	0.27	0.54	$583.41
B. Required activities								
Initial notification of applicability	4	1	4	0.67	2.68	0.13	0.27	$291.16
Initial performance test [d]	40	1	40	0.33	13.2	0.66	1.32	$1,435.86
Daily check of water flow [c]	0.25	365	91.25	1	91.25	4.56	9.12	$9,925.41
Monthly inspections of control devices [c]	4	12	48	1	48	2.4	4.8	$5,221.32
Notification of compliance status	8	1	8	0.67	5.36	0.27	0.54	$583.41
Startup, shutdown, malfunction plan	4	1	4	0.67	2.68	0.13	0.27	$291.16
Semiannual report [e]	2	2	4	1	4	0.2	0.4	$435.10
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						198.41		
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data [c]	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel [c]	N/A							
G. Time for audits [c]	N/A							
Subtotal for Recordkeeping Requirements						0		
					172.53	8.62	17.26	$18,766.83
TOTAL LABOR BURDEN AND COST						198.41 198 (rounded)		$18,767

Assumptions:

[a] There are two existing chemical manufacturing: chromium compounds facilities that are area sources . No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 0.67 (2/3=0.67) for one time events.

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for Clerical labor. 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.

[c] We have assumed that only one facility must implement control device inspection on a recurring basis, so the number of respondents per year is one.

[d] We have assumed that one facility will complete a one performance test over the three-year period of this ICR (1/3 = 0.33 respondents per year).

[e] We have assumed that only one chromium plant will be required to complete semiannual reports.

[f] No hours or costs are associated with this item because the rule imposes no additional burden.

Table 1D: Annual Respondent Burden and Cost - NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	4	1	4	166.67	666.68	33.33	66.67	$72,519.42
B. Required activities								
Initial notification of applicability [c]	4	1	4	0.33	1.32	0.07	0.13	$143.94
Process parameter testing [c]	50	1	50	0.33	16.5	0.83	1.65	$1,795.40
Monitoring equipment calibrations [c]	8	2	16	0.33	5.28	0.26	0.53	$573.99
Storage tank measurement [c]	1	12	12	0.33	3.96	0.2	0.4	$441.18
Pre-compliance report [c]	4	1	4	0.33	1.32	0.07	0.13	$143.94
Notification of compliance status (facilities using methylene chloride) [c]	16	1	16	0.33	5.28	0.26	0.53	$573.99
Notification of compliance status (facilities not using methylene chloride) [d]	1	1	1	16.33	16.33	0.82	1.63	$1,776.59
Semiannual compliance status report [c]	4	2	8	0.33	2.64	0.13	0.26	$286.75
Develop record system [c, e]	80	1	80	0.33	26.4	1.32	2.64	$2,871.73
Time to train personnel [c, e]	80	1	80	0.33	26.4	1.32	2.64	$2,871.73
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						887.93		
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data c	8	12	96	0.33	31.68	1.58	3.17	$3,445.71
E. Time to transmit or disclose information	See 3B							
F. Time for audits [f]	N/A							
Subtotal for Recordkeeping Requirements						36.43		

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) Total Cost Per Year [b]
					803.79	40.19	80.38	$87,443.37
TOTAL LABOR BURDEN AND COST					924.36 924 (rounded)			$87,443

Assumptions:

[a] There are 500 existing flexible polyurethane foam production and fabrication facilities that are area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents that will read the rules and instructions per year is 166.67 (500/3 = 166.67).

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for Clerical labor. 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.

[c] We have assumed that only one facility will be subject to the rule. Therefore, the average number of respondents per year is 0.33 (1/3 = 0.33).

[d] We have assumed that there are 49 plants projected to be subject to this notification. Therefore, the average number of respondents per year is 16.33 (49/3=16.33).

[e] We have assumed that it will take 0.33 respondent 80 hours to complete each of these tasks.

[f] We have assumed that no hours or costs are will be associated with this item because the rule imposes no additional burden.

Table 1E: Annual Respondent Burden and Cost - NESHAP for Area Sources: Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart PPPPPP) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Annualized initial labor costs [c]	55	1	55	2	110	5.5	11	$11,965.52
4. Reporting Requirements								
A. Read instructions	8	1	8	20	160	8	16	$17,404.40
B. Required activities								
Initial notification of applicability	4	1	4	20	80	4	8	$8,702.20
Initial/repeat performance test [d]	40	1	40	5	200	10	20	$20,725.50
Periodic monitoring – daily	0.5	365	182.5	6	1,095	54.75	109.5	$119,111.36
Notification of compliance status	2	1	2	20	40	2	4	$4,351.10
Semiannual inspection [e]	6	2	12	6	72	3.6	7.2	$7,831.98
Semiannual report [e]	2	2	4	6	24	1.2	2.4	$2,610.66
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Subtotal for Reporting Requirements						2,048.15		
4. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
Subtotal for Recordkeeping Requirements						0		
					1,781	89.05	178.1	$192,702.72
TOTAL LABOR BURDEN AND COST						2,048.15 2,048 (rounded)		$192,703

Assumptions:

[a] There are 60 existing Lead Acid Battery Manufacturing facilities that are area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 20 (60/3 = 20).

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for Clerical labor. 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.

[c] We have assumed that the average number of respondents for annualized initial labor costs reflects only six facilities that do not have monitoring in their State permits. Therefore, the average number of respondents per year is 2 (6/3 = 2).

[d] We have assumed that most sources conducted NSPS performance test, only 15 tests are expected during the three-year period of this ICR. Therefore, the average number of respondents per year is 5 (15/3 = 5).

[e] We have assumed that only six lead acid battery plants will be required to complete semiannual reports.

Table 1F: Annual Respondent Burden and Cost - NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (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) Total Cost Per Year [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	4	1	4	131	524	26.2	52.4	$56,999.41
B. Required activities								
Initial notification of applicability and compliance Status	2	1	2	131	262	13.1	26.2	$28,499.71
Check list of best management practices	1	1	1	131	131	6.55	13.1	$14,249.85
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						1,054.55		
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data [c]	N/A							
E. Time to transmit or disclose information	N/A							
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		
					917	45.85	91.7	$99,748.97
TOTAL LABOR BURDEN AND COST						1,054.55 1,054 (rounded)		$99,749

Assumptions:

[a] There are 393 existing wood preserving facilities that are area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 131 (393/3 = 131).

[b] This ICR uses the following labor rates: $114.49 per hour for Executive, Administrative, and Managerial labor; $98.20 per hour for Technical labor, and $48.53 per hour for

Clerical labor. 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.

[c] We have assumed that there are no hours or costs associated with this item because the rule imposes not additional burden for this item.

Table 2A: Average Annual EPA Burden - NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (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]
Report review:								
Initial notification of applicability	2	1	2	0.33	0.66	0.3	0.7	$49.88
Startup, shutdown, malfunction plan [c]	4	1	4	0.33	1.32	0.07	0.13	$68.61
Initial notification of compliance status [c]	4	1	4	0.33	1.32	0.07	0.13	$68.61
					3.3	0.17	0.96	$187.10
TOTAL BURDEN AND COST					4.43 4 (rounded)			$187

Assumptions:

[a] There is one existing acrylic and modacrylic production facility that is an area source. There will be no new additional sources during the next three years of this ICR. Therefore, the average number of respondents per year is 0.33 (1/3 = 0.33).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

[c] We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2B: Average Annual EPA Burden - NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN)(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]
Report review:								
Initial notification of applicability	2	1	2	0.67	1.34	0.07	0.13	$69.53
Startup, shutdown, malfunction plan [c]	4	1	4	0.67	2.68	0.13	0.27	$138.68
Initial notification of compliance status [c]	4	1	4	0.67	2.68	0.13	0.27	$138.68
					6.7	0.33	0.67	$346.89
TOTAL BURDEN AND COST					7.7 8 (rounded)			$347

Assumptions:

[a] There are two existing chemical manufacturing: chromium compounds facilities that are area source. There will be no new additional sources during the next three years of this ICR. Therefore, the average number of respondents per year is 0.67 (2/3 = 0.67).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

[c] We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2C: Average Annual EPA Burden - NESHAP for Area Sources: Carbon Black Production (40 CFR Part 63, Subpart MMMMMM) (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]
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	$0
Initial notification of compliance status	4	1	4	0	0	0	0	$0
TOTAL BURDEN AND COST					0			$0

Assumptions:

[a] There is zero existing carbon black production facility. No new sources are projected during the three-year term of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

Table 2D: Average Annual EPA Burden - NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (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]
Report review:								
Initial notification of applicability [c]	2	1	2	0.33	0.66	0.03	0.07	$34.12
Pre-compliance report [c]	2	1	2	0.33	0.66	0.03	0.07	$34.12
Notification of compliance status [d]	4	1	4	16.32	65.32	3.27	6.53	$3,385.37
Semiannual compliance status report [c]	2	2	4	0.33	1.32	0.07	0.13	$68.61
Notification of special compliance [c]	2	1	2	0.33	0.67	0.03	0.07	$34.58
Change in selected emission limit and compliance method [c]	2	1	2	0.33	0.67	0.03	0.07	$34.58
Request for extension of compliance, adjustments to time periods, and changes in information [c]	2	1	2	0.33	0.67	0.03	0.07	$34.58
Progress reports for extensions [c]	2	1	2	0.33	0.67	0.03	0.07	$34.58
					70.64	3.52	7.08	$3,660.54
TOTAL BURDEN AND COST					81.24 81 (rounded)			$3,660

Assumptions:

[a] There are 500 existing chemical manufacturing: chromium compounds facilities that are area sources. There will be no new additional sources during the next three years of this ICR. Therefore, the average number of respondents per year is 166.67 (500/3 = 166.67).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

[c] We have assumed that only one plant would be subject to these items. Therefore, the average number of respondents per year is 0.33 (1/3 = 0.33).

[d] We have assumed that there are 49 plants subject to this notification. Therefore, the average number of respondents per year is 16.33 (49/3 = 16.33).

Table 2E: Average Annual EPA Burden - NESHAP for Area Sources: Lead Acid Battery Manufacturing (Renewal) (40CFR Part 63, Subpart PPPPPP)

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]
Report review:								
Initial notification of applicability	2	1	2	20	40	2	4	$2,072.98
Semiannual report [c]	2	2	4	2	8	0.4	0.8	$414.60
Initial notification of compliance status [d]	4	1	4	20	80	4	8	$4,145.72
					128	6.4	12.8	$6,633.30
TOTAL BURDEN AND COST					147.2 147 (rounded)			$6,633

Assumptions:

[a] There are 60 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. Therefore, the average number of respondents per year is 20 (60/3 = 20).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

[c] We have assumed that 10 percent of respondents will review semiannual reports.

[d] We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2F: Average Annual EPA Burden - NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (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]
Report review:								
Initial notification of applicability [c]	2	1	2	131	262	13.1	26.2	$13,578.02
Initial notification of compliance status [d]	4	1	4	131	524	26.2	52.4	$27,156.03
					786	39.3	78.6	$40,734.05
TOTAL BURDEN AND COST					903.9 904 (rounded)			$40,734

Assumptions:

[a] There are 393 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. Therefore, the average number of respondents per year is 393 (393/3 = 131).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 for Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are