

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal), EPA ICR Number 1681.07, OMB Control Number 2060-0290

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) were proposed on May 16, 1994, and promulgated on March 8, 1995. This standard applies to all facilities that manufacture polymers and resins from epichlorohydrin. These sources include existing and new facilities producing basic liquid epoxy resin (BLR) and epichlorohydrin-modified non-nylon polyamide resins, also known as wet strength resins (WSR). The source subject to this provision emits the hazardous air pollutants (HAPs) epichlorohydrin, and in lesser amounts, hydrochloric acid and methanol. This information is being collected to assure compliance with 40 CFR part 63, subpart W.

In general, all NESHAP standards require owners or operators of the affected facilities to submit one-time-only notification of any physical or operational change to an existing facility which may increase the regulated pollutant emission rate, notification of initial performance tests, including information necessary to determine the conditions of the performance test, performance test measurements and results, and notification of demonstration of the continuous monitoring system (CMS). 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. Quarterly reports of excess emissions are required. Quarterly reporting may be reduced to semiannually if continuous compliance is achieved for twelve months. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

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 that each plant site has only one respondent (i.e., the owner/operator of the plant site). Approximately seven sources are currently subject to the

standard, three basic liquid epoxy resins (BLR) plants and four wet strength resins (WSR) plants. Over the next three years, an average of seven sources per year will be subject to the standard, and it is estimated that no additional new sources will become subject to the regulation in the next three years.

All of the epoxy resin and non-nylon polyamide plants in the United States are owned and operated by the epoxy resin and non-nylon polyamide industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal, or the Federal government. They are owned and operated by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal).

The active (previous) ICR had the following “Terms of Clearance (TOC):

When this ICR is submitted for renewal, EPA should verify that the wage rate referenced in sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

EPA has addressed the TOC. The wage rates referenced in Sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data

when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutants emissions from epichlorohydrin, methanol and hydrochloric acid from epoxy resin and non-nylon polyamide resin production, 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 W.

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 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 continue 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 40 CFR part 63, subpart W.

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) on 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, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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 basic liquid epoxy resins (BLR) and wet strength resins (WSR) facilities. The U. S. Standard Industrial Classification (SIC) code for the respondents affected by the standards is 2821 which corresponds to the North American Industry Classification System (NAICS) 325211 for Epoxy Resin and Non-Nylon Polyamide Production.

4(b) Information Requested

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

(i) Data Items

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) and (40 CFR Part 63, Subpart A).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction	63.05(d), and 63.520
Initial notification	63.09(b)
Notification of actual startup	63.06
Initial performance test results	63.07(b), 63.10 (d)(2), 63.09(e)
Emissions test and results	63.520, 63.09(e), 63.09(g), 63.10(d)(2)

Notifications	
Monitoring exceedances and excess emissions	63.520, 63.528(a), 63.10(d), 63.10(e)
Production capacity and exceedances	63.520, 63.09(b), 63.09(h)
No excess emissions	6.520, 63.10(e)(3), 63.09(e)
Continuous monitoring system performance and summary report	63.520, 63.10(e)(3), 63.09(g)
Compliance status	63.09(h)
Physical or operational changes	63.520, 63.5(b)(6)
Waiver applications	63.520, 63.07(h)
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(I)
Values of monitored parameters when average values are outside approved ranges	63.528(I), 63.10(e)
Duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data	63.528(2), 63.10(e)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction and malfunction plan, excursions, and periods where the continuous monitoring system is inoperative	63.527, 63.528, 63.06, 63.10(b)(2)
Emission tests results, engineering assessments, and other data needed to determine emissions	63.524, 63.526, 63.527 and 63.10(b)(2)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.10(3)
Records are required to be retained for 5 years	63.10(b)(1)
Reports of process changes which change the status of de minimis emission point	63.528, 63.10(e)
Equipment leaks – monitoring, equipment modification and repair records	63.526

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 10 percent of the respondents are reporting electronically.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate Continuous Monitoring Systems (CMS) for opacity, or for pressure drop and liquid supply pressure.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 18 and 25A test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
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.

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 Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

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

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

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

5(c) Small Entity Flexibility

All of the current 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 Table 1: Annual Respondent Burden - NESHAP for Epoxy Resin and Non-Nylon Polyamide (40 CFR Part 63, Subpart W) (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 is estimated to be 3,853 (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

Managerial	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "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	(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)
Continuous monitoring system	\$2,500	0	\$0	\$3,000	3	\$9,000
Total			\$0			\$9,000

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 \$9,000. 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 \$9,000.

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 \$13,100.

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 rate 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 Epoxy and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (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 seven respondents will be subject to the standard. It is estimated that no new respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is seven per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	7	0	1	7
2	1	7	0	1	7

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
3	1	7	0	1	7
Average	1	7	0	1	7

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

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 seven.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of physical and operational changes	1	1	N/A	1
Startup, shutdown, malfunction report	1	1	N/A	1
Report of monitoring exceedances and periods of noncompliance	1	4	N/A	4
Report of no excess emissions	6	2	N/A	12
Total Number of Annual Responses			Total	18

The number of Total Annual Responses is 18.

The total annual labor costs are \$361,463. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal).

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 3,853. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 214 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$9,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 288 labor hours at a cost of \$13,100. See below Table 2: Annual Agency Burden and Cost – NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Renewal).

6(f) Reasons for Change in Burden

There is no increase in the number of affected facilities, labor hours, or the number of responses compared to the previous ICR. There is, however, an increase in the estimated labor burden cost as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program change. The change in the labor burden cost estimates has occurred because we updated the labor rates, which resulted in an increase in cost.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 214 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-2010-0372. 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-2010-0372 and OMB Control Number 2060-0290 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 Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (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 ^c	1	1	1	0	0	0	0	\$0
B. Required activities ^c								
Basic liquid resins (BLR)	1,050	1	1,050	0	0	0	0	\$0
Repeat initial performance test - process vents	1,050	1	1,050	0	0	0	0	\$0
Initial performance test - wastewater	270	1	270	0	0	0	0	\$0
Repeat initial performance test – wastewater	270	1	270	0	0	0	0	\$0
Wet strength resins (WSR) ^d	270	1	270	0	0	0	0	\$0
C. Create information	See 3B, 4D, 4E							
D. Gather existing information	See 3B, 4D, 4E							
E. Write report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of physical/operational changes ^e	2	1	2	1	2	0.1	0.2	\$215.79
Notification of anticipated startup ^c	2	1	2	0	0	0	0	\$0
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of applicability of the standard – existing sources ^c	2	1	2	0	0	0	0	\$0
Notification of applicability of the standard – new sources ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Report of initial test (including CMS performance evaluation and results) ^c	6	1	6	0	0	0	0	\$0
Submit quality control plan for CMS ^{c,f}	2	1	2	0	0	0	0	\$0
Submit startup, shutdown, malfunction plan	2	1	2	1	2	0.1	0.2	\$215.79

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
Report of monitoring exceedances and periods of Noncompliance ^g	16	4	64	1	64	3.2	6.4	\$6,905.57
Report of no excess emissions ^h	8	2	16	6	96	4.8	9.6	\$10,358.35
Report of area source becoming major ⁱ	6	1	6	0	0	0	0	\$0
Waiver application ^j	6	1	6	1	6	0.3	0.6	\$647.39
Compliance status information report ^c	4	1	4	0	0	0	0	\$0
Subtotal for Reporting Requirements						195.5		\$18,342.89
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	N/A							
C. Implement activities	See 4D, 4E							
D. Develop record system ^c	40	1	40	0	0	0	0	\$0
E. Time to enter information								
a. Records of startup, shutdown, malfunction, etc.	2	1	2	1	2	0.1	0.2	\$215.79
b. Records of control device monitoring parameters:								
- Continuously monitored parameters ^{k,1}	12	52	624	3	1,872	93.6	187.2	\$201,987.86
- LDAR program reporting and recordkeeping - BLR ^k	311	1	311	3	933	46.65	93.3	\$100,670.23
- LDAR program reporting and recordkeeping - WSR ^m	11	1	11	4	44	2.2	4.4	\$4,747.58
- Wastewater parameters ^{k,n}	2	12	24	3	72	3.6	7.2	\$7,768.76
F. Other recordkeeping activities								
a. Maintain records of occurrence and duration of each SSM of process and control equipment ^{h,o}	2	8	16	7	112	5.6	11.2	\$12,084.74
b. Maintain records of maintenance performed on air pollution control equipment ^h	2	4	8	7	56	2.8	5.6	\$6,042.37
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan ^{h,p}	2	1	2	7	14	0.7	1.4	\$1,510.59
d. Maintain records of each period during which a CMS is malfunctioning or inoperative ^k	2	1	2	3	6	0.3	0.6	\$647.39

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
e. Maintain records of result of all performance test and performance evaluations ^h	2	1	2	7	14	0.7	1.4	\$1,510.59
f. Maintain all initial notification and compliance status notifications ^h	1	1	1	7	7	0.35	0.7	\$755.30
g. Submit semiannual SSM reports ^{h,q}	2	2	4	7	28	1.4	2.8	\$3,021.19
h. Submit immediate reports of inconsistent procedures monitored at each affected source ^h	2	1	2	7	14	0.7	1.4	\$1,510.59
i. Submit a CMS summary report for HAP monitored at each affected source ^k	2	1	2	3	6	0.3	0.6	\$647.39
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						3,657		\$343,120.27
					3,350	167.5	335	\$361,463.26
TOTAL LABOR BURDEN AND COST (rounded)						3,852.5 3,853 (rounded)		\$361,463 (rounded)

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be seven, which consists of three basic liquid epoxy resins (BLR) plants and four wet strength resins (WSR) plants. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2010, 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 this is a one-time-only cost.

^d For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, storage tanks, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart H - leak detection and repair program for equipment leaks. Because of it being more cost-effective, it is assumed that all WSR facilities will choose to comply with the alternative standard. These facilities are not required to have the continuous monitoring systems (CMS) installed.

^e We have assumed that one facility will have a physical or operational change.

^f We have assumed that it will require one test each for wastewater and process vents.

^g We have assumed that only one facility will have excess emissions.

^h We have assumed that there are seven sources that are subject to this regulation, so the number of sources without excess emissions report is six.

ⁱ We have assumed that no area sources are expected to become major sources.

- ^j We have assumed that one facility will require a waiver.
- ^k We have assumed that there are three basic liquid resins (BLR) manufacturing facilities.
- ^l We have assumed that these parameters will automatically be recorded with a data logger.
- ^m We have assumed that there are four WSR facilities subject to the rule.
- ⁿ We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.
- ^o We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility.
- ^p We have assumed that it will take two hours once per year for each facility to maintain records for one deviation from SSM plans.
- ^q We have assumed that it will take each respondent two hours to submit semiannual (SSM) reports. Also quarterly reporting may be reduced to semiannual reporting for sources that are in compliance for one year.

Table 2: Average Annual EPA Burden - NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (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								
Notification of construction/ reconstruction and startup ^c	2	1	2	1	2	0.1	0.2	\$103.65
Notification of physical and operational changes ^d	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of applicability of the standard new sources	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Report of initial test	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
Quality control plan for CMS ^c	4	1	4	0	0	0	0	\$0
Semiannual SSM reports ^{e, f}	4	2	8	6	48	2.4	4.8	\$2,487.58
CMS summary report for HAP	4	3	12	7	84	4.2	8.4	\$4,353.25
Compliance status information report	4	1	4	7	28	1.4	2.8	\$1,451.09
Report of monitoring exceedances and periods of noncompliance ^g	8	4	32	1	32	1.6	3.2	\$1,658.38
Report of no excess emission	2	4	8	6	48	2.4	4.8	\$2,631.58
Waiver application ^h	8	1	8	1	8	0.4	0.8	\$414.60
Subtotals Labor Burden and cost					250	12.5	25	\$13,100.13
TOTAL ANNUAL BURDEN AND COST (rounded)						287.5 288 (rounded)		\$13,100

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be the seven, which consists of three liquid epoxy resins (BLR) plants and four wet strength

resins (WSR) plants. There will be no additional new sources per year that will become subject to the rule over the three-year period 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 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (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 this is a one-time-only cost.

^d We have assumed that only one facility will conduct some form of physical or operational change.

^e We have assumed that there are six sources that are subject to this regulation that report semiannually.

^f We have assumed that it will take four hour to review semiannual reports.

^g We have assumed that one facility will have excess emissions.

^h We have assumed that one facility will request a waiver.