

Cost Factor (in 2008\$)	Reference/Note
Advanced Combustion Controls (Linkageless Boiler Management System) -- cost is per boiler - TCI	
\$ 19,127	LBMS costs are based on a 2008 quote provided to the U.S. Department of Energy. The installed cost for a LBMS on a 20 mmBtu/hr unit was are \$19,127. The DOE noted that costs are relatively fixed, regardless of the size of the unit.
Activated Carbon Injection	
Hospital/Medical/Infectious Waste Incinerators (HMIWI). [EPA-HQ-OAR-2006-0534]	Received spreadsheet of HMIWI model costs from Tom Holloway of RTI International.
Fabric Filter	
Hospital/Medical/Infectious Waste Incinerators (HMIWI). [EPA-HQ-OAR-2006-0534]	Received spreadsheet of HMIWI model costs from Tom Holloway of RTI International.
Packed Scrubber	
Hospital/Medical/Infectious Waste Incinerators (HMIWI). [EPA-HQ-OAR-2006-0534]	Received spreadsheet of HMIWI model costs from Tom Holloway of RTI International.
Secondary Chamber/Afterburner Retrofit	
Hospital/Medical/Infectious Waste Incinerators (HMIWI). [EPA-HQ-OAR-2006-0534]	Received spreadsheet of HMIWI model costs from Tom Holloway of RTI International.
Selective Non-Catalytic Reduction	
Hospital/Medical/Infectious Waste Incinerators (HMIWI). [EPA-HQ-OAR-2006-0534]	Received spreadsheet of HMIWI model costs from Tom Holloway of RTI International.
Catalytic Oxidizer	

Used catalytic oxidizer costing for all sizes, though some fell outside the appropriate size-range for the equation.

Year of Costs



Assumed to represent \$2008, since that was the year the quote was obtained.



Originally \$2004



Originally \$2004



Originally \$2004



Originally \$2004



Originally \$2004



Originally \$2004

2. Required activities							
a. Perf. spec. tests (certif.) for CMS	11	1	11	0.6	1.1	13	\$1,197

Notes:

2. Person-hours per occurrence for CMS performance specification costs are based on the performance specification costs to certify CMS (\$700) divided by the composite hourly labor rate (\$66.41/hr).
3. Control device inspection cost already accounted for under monitoring costs.
4. Assume 8 hours for each facility to review the report of the initial performance test for pollutants and fugitive ash.
5. Assume 2 hours for each facility to review the report of the initial performance test for fugitive ash.
6. Assume 40 hours to review report of annual PM, CO, and HCl compliance reports.
7. The average recurrent burden and cost in the first 3 years after promulgation for the sources with recurrent burden are equal to the person-hours added down each column for technical, management, and clerical and the sum of the cost column.

Sources:

1. Bureau of Labor Statistics, Occupational Employment Statistics, May 2008 National Industry-Specific Occupational Employment and Wage Estimates.
2. Hospital/Medical/Infectious Waste Incinerators (HMIWI) [EPA-HQ-OAR2006-0534] Testing and Monitoring Options and Costs Memo (IV-B-66).

Attachment G1 - Recordkeeping and Reporting Annual Cost Summary
 April 11, 2011
 Draft - Do Not Cite or Quote

**Table 1.D Calculation of Annual Recordkeeping and Reporting Costs
 on a Per Facility Basis**

Caclulation of Annual Recordkeeping and Reporting Cost on a Per Facility Basis	
Total Recordkeeping, Monitoring, and Reporting Cost	
Year 1	\$ 2,740,467
Year 2	\$ 2,774,693
Year 3	\$ 2,774,693
Total	\$ 8,289,852
Initial / Yearly Performance Testing and Monitoring Cost	
Year 1	\$ 2,434,720
Year 2	\$ 2,461,400
Year 3	\$ 2,461,400
Total	\$ 7,357,520
Record Keeping and Reporting Cost less Performance Testing and Monitoring	
Total Cost	\$ 8,289,852
Performance Testing	\$ 7,357,520
Difference	\$ 932,332
Annual Difference (difference divided by 3)	\$ 310,777
Per Facility Record Keeping and Reporting Cost Less Performance Testing and Monitoring	
Annual Difference	\$ 310,777
Number of Facilities	17
Cost per Facility	\$ 18,281

Monitoring Costs

Parameters/Costs	Equation	FF	ACI
A. Parameters			
1. Recording lime/carbon flow, min/4-hr period			5
2. Annual operating hours, hr/yr (H)		8,400	8,400
3. Cost index			
a. 2010		539.1	539.1
b. 2006		499.6	499.6
c. 1997		386.5	386.5
d. 1993		359.2	359.2
e. 1992		358.2	358.2
4. Operating labor wage rate, \$/hr (LR)		\$98.20	\$98.20
5. Capital recovery factor, 20-yr equipment life, 7% interest (CRF)	$= [i \times (1 + i)^a] / [(1 + i)^a - 1]$, where i = interest rate, a = equipment life	0.09439	0.09439
B. Total Capital Investment, \$ (TCI)			
1. Planning		\$700	
2. Select type of equipment		\$400	
3. Provide support facilities		\$1,400	
4. Purchased equipment cost (PEC)		\$12,200	
5. Install and check equipment		\$1,000	
6. Perf. spec. tests (certif.)		\$700	
7. Prepare QA/QC plan		\$700	
8. Total capital cost	= Planning + selecting equipment + support facilities + PEC + installation + perf. spec. tests + QA/QC plan	\$ 17,100.00	
C. Annual Costs, \$/yr			
1. Operating labor	$= (5 \text{ min to record lime/carbon flow/4-hr period}) \times (1 \text{ hr}/60 \text{ min}) \times H \times LR$		\$17,200
2. Maintenance materials	$= 0.02 \times \text{TCI}$	\$300	
3. Operation & maintenance	= Day-to-day activities + annual RATA + CGA + annual QA + O&M review and update		
4. Recordkeeping and reporting	$= \$1,000 \times (641.1/386.5)$	\$1,400	
5. Overhead	$= 0.6 \times (\text{labor} + \text{maintenance materials})$	\$200	\$10,300
6. Property taxes, insurance, and administration	$= 0.04 \times \text{TCI}$	\$700	
7. Capital recovery	$= \text{CRF} \times \text{TCI}$	\$1,600	
8. Total annual cost	= Operating labor + maintenance materials + recordkeeping and reporting + overhead + property taxes, insurance, and administration + capital recovery	\$4,200	\$27,500
9. Annual costs minus capital recovery		\$2,600	\$27,500

Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 1

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (CxD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	17	425	21	43	\$46,229	\$1,700	0	a,b
B. Required Activities												
1) Initial performance test, sampling, and report	40	\$53,139	1	40	17	680	34	68	\$73,966	\$903,355	0	a
2) Periodic performance test, sampling, and report	15	\$54,042	1	15	17	255	13	26	\$27,737	\$918,716	0	f
3) Establish operating parameters and monitoring plan	20	\$0	1	20	17	340	17	34	\$36,983	\$0	0	a
4) Continuous parameter monitoring												
a) Initial capital costs (Fabric Filters)	0	\$17,100	1	0	5	0	0	0	\$0	\$85,500	0	a,d
b) Annualized capital and O&M costs (Fabric Filters & ACI)	11	\$31,700	1	11	5	55	3	6	\$5,983	\$158,500	0	c,e
c) Initial capital costs (PRD Electronic Monitor)	0	\$188,913	1	0	17	0	0	0	\$0	\$3,211,521	0	a,d
d) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$26,897	1	11	17	187	9	19	\$20,341	\$457,249	0	c,e
e) Initial capital costs (PB Scrubber Monitor)	0	\$23,000	1	0	1	0	0	0	\$0	\$23,000	0	a,d
f) Annualized capital and O&M costs (PB Scrubber Monitor)	11	\$5,300	1	11	1	11	1	1	\$1,197	\$5,300	0	c,e
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	17	85	4	9	\$9,246	\$0	17	
2) Batch precompliance report	5	\$0	1	5	17	85	4	9	\$9,246	\$0	17	
3) Notification of performance test with test plan	10	\$0	1	10	17	170	9	17	\$18,492	\$0	17	
4) Notification of compliance status	20	\$0	1	20	17	340	17	34	\$36,983	\$0	17	b
5) Compliance report	25	\$0	1	25	0	0	0	0	\$0	\$0	0	
6) Notice of inspection	5	\$0	1	5	17	85	4	9	\$9,246	\$0	17	
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	g
Reporting Subtotal						2,718	136	272	\$295,647	\$2,444,820	85	
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	
2) Records of resin stripper and wastewater requirements	15	\$0	1	15	0	0	0	0	\$0	\$0	0	
3) Records of storage vessel requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	
4) Records of equipment leak requirements	25	\$0	1	25	0	0	0	0	\$0	\$0	0	
5) Records of heat exchanger requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						0	0	0	\$0	\$0	0	
TOTAL:						2,718	136	272	\$295,647	\$2,444,820	85	
							Total Hours	Labor	Non-Labor	Total		
							3,126	\$295,647	\$2,444,820	\$2,740,467		
							Initial Capital and Startup		\$3,298,721			
							Annualized Capital/Start-up and O & M		\$2,444,820			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for PVC facilities.
- e Based on the sum of the annualized capital costs for each monitoring system required for PVC facilities.
- f Includes 11 months testing for wastewater and resin to cover rest of the year after the initial test.
- g Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate

Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 2

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (CxD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	0	0	0	0	\$0	\$0	0	a,b
B. Required Activities												
1) Initial performance test, sampling, and report	40	\$53,139	1	40	0	0	0	0	\$0	\$0	0	a
2) Periodic performance test, sampling, and report	50	\$108,750	1	50	17	850	43	85	\$92,458	\$1,848,751	0	
3) Establish operating parameters and monitoring plan	20	\$0	1	20	0	0	0	0	\$0	\$0	0	a
4) Continuous parameter monitoring												
a) Initial capital costs (Fabric Filters)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs (Fabric Filters & ACI)	11	\$31,700	1	11	5	55	3	6	\$5,983	\$158,500	0	c,e
c) Initial capital costs (PRD Electronic Monitor)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
d) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$26,897	1	11	17	187	9	19	\$20,341	\$457,249	0	c,e
e) Initial capital costs (PB Scrubber Monitor)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
f) Annualized capital and O&M costs (PB Scrubber Monitor)	11	\$5,300	1	11	1	11	1	1	\$1,197	\$5,300	0	c,e
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	0	0	0	0	\$0	\$0	0	
2) Batch precompliance report	5	\$0	1	5	0	0	0	0	\$0	\$0	0	
3) Notification of performance test with test plan	10	\$0	1	10	0	0	0	0	\$0	\$0	0	
4) Notification of compliance status	20	\$0	1	20	0	0	0	0	\$0	\$0	0	b
5) Compliance report	25	\$0	1	25	17	425	21	43	\$46,229	\$0	17	
6) Notice of inspection	5	\$0	1	5	17	85	4	9	\$9,246	\$0	17	
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	f
Reporting Subtotal						1,613	81	161	\$175,452	\$2,469,800	34	
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
2) Records of resin stripper and wastewater requirements	15	\$0	1	15	17	255	13	26	\$27,737	\$0	0	
3) Records of storage vessel requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
4) Records of equipment leak requirements	25	\$0	1	25	17	425	21	43	\$46,229	\$0	0	
5) Records of heat exchanger requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						1190	59.5	119	\$129,441	\$0	0	
TOTAL:						2,803	140	280	\$304,893	\$2,469,800	34	
								Total Hours	Labor	Non-Labor	Total	
								3,223	\$304,893	\$2,469,800	\$2,774,693	
								Initial Capital and Startup		\$0		
								Annualized Capital/Start-up and O & M		\$2,469,800		

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for PVC facilities.
- e Based on the sum of the annualized capital costs for each monitoring system required for PVC facilities.
- f Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate

Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 3

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	0	0	0	0	\$0	\$0	0	a,b
B. Required Activities												
1) Initial performance test, sampling, and report	40	\$53,139	1	40	0	0	0	0	\$0	\$0	0	a
2) Periodic performance test, sampling, and report	50	\$108,750	1	50	17	850	43	85	\$92,458	\$1,848,751	0	
3) Establish operating parameters and monitoring plan	20	\$0	1	20	0	0	0	0	\$0	\$0	0	a
4) Continuous parameter monitoring												
a) Initial capital costs (Fabric Filters)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs (Fabric Filters & ACI)	11	\$31,700	1	11	5	55	3	6	\$5,983	\$158,500	0	c,e
c) Initial capital costs (PRD Electronic Monitor)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
d) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$26,897	1	11	17	187	9	19	\$20,341	\$457,249	0	c,e
e) Initial capital costs (PB Scrubber Monitor)	0	\$0	1	0	0	0	0	0	\$0	\$0	0	a,d
f) Annualized capital and O&M costs (PB Scrubber Monitor)	11	\$5,300	1	11	1	11	1	1	\$1,197	\$5,300	0	c,e
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	0	0	0	0	\$0	\$0	0	
2) Batch precompliance report	5	\$0	1	5	0	0	0	0	\$0	\$0	0	
3) Notification of performance test with test plan	10	\$0	1	10	0	0	0	0	\$0	\$0	0	
4) Notification of compliance status	20	\$0	1	20	0	0	0	0	\$0	\$0	0	b
5) Compliance report	25	\$0	1	25	17	425	21	43	\$46,229	\$0	17	
6) Notice of inspection	5	\$0	1	5	17	85	4	9	\$9,246	\$0	17	
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	f
Reporting Subtotal						1,613	81	161	\$175,452	\$2,469,800	34	
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
2) Records of resin stripper and wastewater requirements	15	\$0	1	15	17	255	13	26	\$27,737	\$0	0	
3) Records of storage vessel requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
4) Records of equipment leak requirements	25	\$0	1	25	17	425	21	43	\$46,229	\$0	0	
5) Records of heat exchanger requirements	10	\$0	1	10	17	170	9	17	\$18,492	\$0	0	
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						1,190	59.5	119	\$129,441	\$0	0	
TOTAL:						2,803	140	280	\$304,893	\$2,469,800	34	
							Total Hours	Labor	Non-Labor	Total		
							3,223	\$304,893	\$2,469,800	\$2,774,693		
							Initial Capital and Startup		\$0			
							Annualized Capital/Start-up and O & M		\$2,469,800			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for PVC facilities.
- e Based on the sum of the annualized capital costs for each monitoring system required for PVC facilities.
- f Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	2,718	136	272	3,126	\$295,647	\$2,444,820	\$2,740,467
2	2,803	140	280	3,223	\$304,893	\$2,469,800	\$2,774,693
3	2,803	140	280	3,223	\$304,893	\$2,469,800	\$2,774,693
Total	8,324	416	832	9,573	\$905,432	\$7,384,420	\$8,289,852
Average	2,775	139	277	3,191	\$301,811	\$2,461,473	\$2,763,284

Attachment 3

Table 5 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 1

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	10		16	160	8	16	\$8,292
3. Required Activities							
A. Observe initial performance tests	3	b	48	163	8	16	\$8,457
B. Excess emissions -- Enforcement Activities	2	d	24	41	2	4	\$2,114
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	17		3	51	3	5	\$2,643
2) Review batch precompliance report	17		5	85	4	9	\$4,405
3) Review notification of performance test	17		10	170	9	17	\$8,810
4) Review notification of compliance status	17		40	680	34	68	\$35,239
5) Review compliance report	0		20	0	0	0	\$0
6) Review notice of inspection	17		3	51	3	5	\$2,643
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					\$881	per trip	\$2,996
TOTAL				1601	80	160	\$85,964

FOOTNOTES

- a Figures may not add exactly due to rounding.
- b Assumes EPA personnel attend 20 percent of the initial stack tests.
- c Using four hours per state to write annual summary report.
- d Assume 10% have emission exceedances.

Attachment 3

Table 6 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 2

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0		16	0	0	0	\$0
3. Required Activities							
A. Observe initial performance tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	2	d	24	41	2	4	\$2,114
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	0		3	0	0	0	\$0
2) Review batch precompliance report	0		5	0	0	0	\$0
3) Review notification of performance test	0		10	0	0	0	\$0
4) Review notification of compliance status	0		40	0	0	0	\$0
5) Review compliance report	17		20	340	17	34	\$17,620
6) Review notice of inspection	17		3	51	3	5	\$2,643
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					n/a	per trip	\$0
TOTAL				632	32	63	\$32,741

FOOTNOTES

- a Figures may not add exactly due to rounding.
- b Assumes EPA personnel attend 20 percent of the initial stack tests.
- c Using four hours per state to write annual summary report.
- d Assume 10% have emission exceedances.

Attachment 3

Table 7 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 3

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0		16	0	0	0	\$0
3. Required Activities							
A. Observe initial performance tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	2	d	24	41	2	4	\$2,114
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	0		3	0	0	0	\$0
2) Review batch precompliance report			5				
3) Review notification of performance test	0		10	0	0	0	\$0
4) Review notification of compliance status	0		40	0	0	0	\$0
5) Review compliance report	17		20	340	17	34	\$17,620
6) Review notice of inspection	17		3	51	3	5	\$2,643
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					n/a	per trip	\$0
TOTAL				632	32	63	\$32,741

FOOTNOTES

a Figures may not add exactly due to rounding.

b Assumes EPA personnel attend 20 percent of the initial stack tests.

c Using four hours per state to write annual summary report.

d Assume 10% have emission exceedances.

Attachment 3

Table 8 - Summary of Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	1,601	80	160	1,841	\$85,964	\$0	\$85,964
2	632	32	63	727	\$32,741	\$0	\$32,741
3	632	32	63	727	\$32,741	\$0	\$32,741
Total	2,865	143	286	3,294	\$151,447	\$0	\$151,447
Average	955	48	95	1,098	\$50,482	\$0	\$50,482