

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production (Subpart HHHHHHH)

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production (40 CFR part 63, subpart HHHHHHH)

1(b) Short Characterization/Abstract

This supporting statement addresses information collection activities that will be imposed by the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers (PVC) Production, 40 CFR part 63, subpart HHHHHHH, referred to as the PVC NESHAP. In 2002, the Environmental Protection Agency (EPA) promulgated national emission standards for hazardous air pollutants for new and existing PVC and copolymers production facilities under 40 CFR part 63, subpart J (67 FR 45886, July 10, 2002). In 2004 the court vacated and remanded the subpart J NESHAP, and the proposed standard is in response to the remand in accordance with Clean Air Act (CAA) section 112. This information collection request (ICR) documents the associated recordkeeping and reporting for the proposed PVC NESHAP.

This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the proposed PVC NESHAP. These activities include reading the rule, resin sampling, performance testing, establishing operating parameters, and monitoring, recordkeeping, and reporting requirements. We realize that some facilities may not incur these costs within the first three years, and may incur them during the fourth or fifth year instead. Therefore, this ICR presents a conservatively high burden estimate for the initial three years following promulgation of the proposed PVC NESHAP.

The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA Administrator or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

This ICR presents the burden to respondents and the Designated Administrator (State or Federal Government) that will be imposed by the plans developed to implement the PVC NESHAP. Respondents are owners or operators of existing PVC production facilities.

The requirements described below are the minimum requirements established by the PVC NESHAP. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the PVC

NESHAP.

Over the next three years, 17 PVC production facilities will be subject to this standard, and the cost of this ICR will be \$8.3 million. The burden to the “Affected Public” for each PVC facility may be found in Tables 1 through 4 in Attachment 2. This rule affects respondents in only the private sector. The burden to the “Designated Administrator” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Tables 5 through 8 of Attachment 3.

2. AUTHORITY/NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

The EPA is charged under CAA Section 112, 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 require the maximum degree of emission reduction. In addition, CAA section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, HAP emissions from PVC production facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP are proposed for this source category at 40 CFR part 63, subpart HHHHHHHH.

2(b) Practical Utility/Users of the Data

The information will be used by Designated Administrators' enforcement personnel to ensure that the requirements are being implemented and are complied with on a continuous basis. Specifically, the information will be used by the Designated Administrator to: (1) identify sources subject to the standards; (2) ensure that the PVC NESHAP is being properly applied; (3) ensure that the PVC NESHAP is being complied with; and (4) ensure, on a continuous basis, that the operating parameters established during performance tests are not exceeded.

In addition, records and reports are necessary to enable the Designated Administrator to

identify PVC production facilities that may not be in compliance with the standards. Based on reported information, the Designated Administrator can decide which facilities should be inspected and what records or processes should be inspected. The records that facilities maintain would indicate to the Designated Administrator whether the personnel are operating and maintaining control equipment properly and whether they have met the qualification requirements.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

The requested recordkeeping and reporting will be required under 40 CFR part 63, subpart HHHHHHH.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public notice prior to ICR submission to OMB

A public notice of this collection is being provided in the Federal Register notice of proposed rulemaking published for the PVC NESHAP.

3(c) Consultations

The public has the opportunity to review and comment on the proposed PVC NESHAP and ICR during the public comment period.

3(d) Effects of Less Frequent Data Collection

The PVC NESHAP requires an initial notification, initial and periodic testing, continuous operating parameter monitoring, a notification of compliance status, and compliance reports. The frequency of these activities was chosen by EPA as the period that will provide an adequate margin of assurance that affected facilities will not operate for extended periods in violation of the standards.

During the initial performance tests for vinyl chloride, total HAP, hydrogen chloride (HCl), and chlorinated dibenzo-dioxins and furans (CDD/CDF), the owner or operator must establish maximum or minimum values for each operating parameter. Thereafter, the owner or operator must continuously monitor the operating parameters. In addition, monthly wastewater and resin sampling must also be performed. Owners and operators must also conduct a leak detection and repair program and must operate a vinyl chloride monitoring system.

Although continuous monitoring of operating parameters cannot provide a direct measurement of emissions, it is less expensive than continuous emissions monitoring systems (CEMS), and the information provided can be used to ensure that the air pollution control devices are operating properly. This information assures EPA and the public that the reductions envisioned by the regulations are being achieved. Less frequent monitoring would not ensure continuous compliance.

The compliance reports allow the submittal of required information and data parameters so that any potential problems can be identified in a timely fashion.

3(e) General Guidelines

With the exception of requiring records to be maintained for more than three years, none of the guidelines in 5 CFR 1320.5 are being exceeded. This rule requires all records to be maintained at the source for a period of five years. In 40 CFR part 63, subpart A, "General Provisions for National Emission Standards for Hazardous Air Pollutants for Source Categories," owners or operators of facilities are required to keep and maintain records for a period of five years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly. The title V permit programs also require records to be retained for five years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

3(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in 40 CFR 2, subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of new or existing PVC production facilities. The PVC NESHAP affects any industry using a polyvinyl chloride and copolymers production process unit as defined in the regulation. This includes, but is not limited to, North American Industry Classification System (NAICS) Code 325211 (Facilities that polymerize vinyl chloride monomer to produce PVC and/or copolymers products).

Based on the distribution of facilities with affected PVC production facilities, there are 17 existing facilities which will be affected. Of these, 100 percent are located in the private sector.

4(b) Information Requested

(i) Data Items

Attachment 1, Source Data and Information Requirements, and Tables 1 through 4 of Attachment 2 present a summary of the recordkeeping and reporting requirements of this regulation.

(ii) Respondent Activities

The respondent activities required by the standards are provided under the first column of Tables 1 through 4 of Attachment 2, introduced in section 6(a). All burden items are included in these tables.

(iii) Summary of Requirements

The information collection activities in this ICR include the following: reading the rule, performance tests, wastewater sampling, resin sampling, leak detection monitoring, heat exchanger monitoring, pressure relief device (PRD) monitoring, operating parameter monitoring, preparation of a site-specific monitoring plan, one-time and periodic reports, and the maintenance of records. Some information collection activities included in the PVC NESHAP may occur within the first three years, and are presented in this burden estimate, but may not occur until four or five years following promulgation of the proposed standards for some affected sources. To be conservative in our estimate, the burden for these items is included in this ICR.

An initial notification is required to notify the Designated Administrator of the applicability of this subpart and to identify storage vessels, process vents, equipment leaks, and other equipment and emission points subject to this subpart.

A notification of performance test must be submitted, and a site-specific test plan written for the performance test along with a monitoring plan. The regulation requires an initial performance test for the following pollutants, vinyl chloride, total HAP, HCl, and CDD/CDF. During the initial performance test the owner or operator must establish limits for each operating parameter. Thereafter, the owner or operator must continuously monitor the operating parameters. Annual performance tests are also required for total HAP and CDD/CDF.

For resin strippers and wastewater streams, testing is required for vinyl chloride and total HAP. An initial test must be performed and subsequent monthly testing is also required. Monthly monitoring is also required for heat exchangers and equipment leaks.

Following the initial performance test, the owner or operator must submit a notification of compliance status that documents the performance tests, values for the operating parameters, resin stripper tests, and wastewater tests. This report also includes the following additional items: identification of storage vessels, information for equipment leaks, and identification of

heat exchange systems.

A compliance report submitted annually documents the values for the operating parameters and deviations, storage vessel inspection records, leak and monitoring information for equipment leaks, and leak and monitoring data for heat exchangers if greater than leak definition. Other reporting requirements include submittal of a batch pre-compliance report and notice of inspection.

Owners or operators of PVC production facilities are required to keep records of certain parameters and information for a period of five years. These records include the initial performance test and operating parameter values consistent with the monitoring plan; resin stripper and wastewater testing results; the date and time for each deviation; copies of the current version of the monitoring plan and the equipment leak detection and repair plan; monitoring schedule and inspection records for valves, pumps, connectors, agitators, pressure relief devices, and compressors; inspection records for storage vessels; defects and leaks for vessels; and monitoring events along with leak and repair dates for heat exchangers.

All reports are to be submitted to the Designated Administrator. The information will be used to determine that all sources subject to the PVC NESHAP are achieving the requirements.

As an administrative addition to this ICR, EPA is also including an illustrative estimate of the burden associated with performing a Root Cause Analysis (RCA) associated with affirmative defense of malfunctions if the source elects to avail themselves to this defense in court. EPA is providing this as an illustrative example of the potential additional administrative burden a source may incur to assert in an affirmative defense in response to an action to enforce the standards set forth in the applicable subpart. If a source is in compliance and does not encounter malfunctions that cause a violation of the standard, EPA does not expect this activity to be routinely performed by a source. Our decision to include this recordkeeping and reporting in the ICR burden is not to assert that EPA assumes less than full compliance. EPA cannot estimate whether an affirmative defense would be necessary for any source or class of sources. It is not an enforceable requirement of compliance.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION, METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

A list of Agency activities is provided in section 6(c) and in Tables 5 through 8 of Attachment 3.

5(b) Collection Methodology and Management

Data obtained during periodic visits by EPA personnel, from records maintained by the respondents, and from information provided in reports will be tabulated and published for internal EPA use in compliance and enforcement programs. The PVC NESHAP allows records to be retained in hardcopy or electronic format to allow flexibility and minimize burden.

Information contained in the reports is entered into the Air Facility System (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

The PVC NESHAP does not contain any provisions reserved exclusively for the benefit of small entities; however, there are provisions that reduce the impact on all regulated entities, which would include any small entities. Reporting is annual and operating parameter monitoring is required instead of CEMS.

5(d) Collection Schedule

In the first three years following promulgation of the PVC NESHAP owners or operators would read the rule and are required to submit an initial notification. As discussed earlier, we also anticipate many of the one-time activities, including: initial performance tests (vinyl chloride, total HAP, HCl, and CDD/CDF), initial resin stripper and wastewater testing, and the notification of compliance status (including performance tests results and operating parameter values) to occur for many facilities within the first three years, but they may occur in years four or five.

Every year a compliance report that includes data on the operating parameters and deviations, and information from inspections and monitoring is required.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Tables 1 through 4 of Attachment 2 document the computation of individual burdens and non-labor costs for the recordkeeping and reporting requirements applicable to the industry for each year for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory. Tables 5 through 8 of Attachment 3 present a summary of the agency burden.

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 3,200 hours. The average annual recordkeeping hours are 900 and the reporting requirement hours are 2,300, both of which are shown in Tables 1 through 4 of Attachment 2.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 2. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) costs.

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$114.49 (\$54.52 + 110%)
Technical	\$98.20 (\$46.76 + 110%)
Clerical	\$48.53 (\$23.11 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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/Start-up and Operation and Maintenance Costs

The capital costs associated with the proposed PVC NESHAP include monitoring system initial costs, performance testing, resin stripper testing, wastewater testing; one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors, perform subsequent testing, and other costs such as photocopying and postage.

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

Below are the estimated capital and startup costs and O&M costs for the affected units for the first three years after promulgation.

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A) Unit Type	(B) Number of Respondents (facilities)	(C) Total Capital/Startup Costs	(D) Total Annualized Capital/Start-up and O&M over 3 years	(E) Average Annual Capital/Startup and O&M Costs
PVC Facilities Total	17	\$3,300,000	\$7,400,00	\$2,500,000

The total capital/startup costs for this ICR are \$3,300,000; column C.

The total annualized capital/startup and O&M costs for this ICR are \$7.4, million, or an average of \$2.5 million per year; columns D and E. These are recordkeeping costs.

(iv) Burden under Affirmative Defense

When a malfunction occurs, sources must report them according to the applicable reporting requirements of this Subpart HHHHHHHH. An affirmative defense to civil penalties for exceedances of emission limits that are caused by malfunctions is available to a source if it can demonstrate that certain criteria and requirements are satisfied. The criteria ensure that the affirmative defense is available only where the event that causes an exceedance of the emission limit meets the narrow definition of malfunction in 40 C.F.R. 63.2 (sudden, infrequent, not reasonable preventable and not caused by poor maintenance and or careless operation) and where the source took necessary actions to minimize emissions. In addition, the source must meet certain notification and reporting requirements. For example, the source must prepare a written root cause analysis and submit a written report to the Administrator documenting that it has met the conditions and requirements for assertion of the affirmative defense.

EPA considered whether there might be any burden associated with the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. While recognizing that any such burdens are only incurred if there has been a violation and a source chooses to take advantage of the affirmative defense. The PVC industry is currently required to comply with the part 61 NESHAP requirement for releases from pressure relief valves and reactor manual vent valves, which does not allow a discharge into the atmosphere from these valves, except during an emergency. An emergency discharge means a “discharge which could not have been avoided by taking measures to prevent the discharge.” The owners or operators must, within 10 days of any release from a pressure relief valve or a reactor manual vent valve, submit a report to the Administrator. The report must include the “nature and cause of discharge, the date and time of the discharge, the approximate total vinyl chloride loss during the discharge, the method used for determining the vinyl chloride loss, the action that was taken to prevent the discharge, and measures adopted to prevent future discharges.” The costs for these reports are already accounted for in the ICR burden estimate. Therefore, EPA estimates that there would be no additional costs for sources that choose to take advantage of the affirmative defense for malfunctions since it is already required for compliance with the rule. However, there may be additional malfunctions that are not currently regulated under the part 61 NESHAP that might require an affirmative defense.

To provide the public with an estimate of the relative magnitude of the burden associated with an assertion of the affirmative defense position adopted by a source (for those not already regulated under the part 61 NESHAP), EPA provides an administrative adjustment to this ICR that shows the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense might entail. EPA’s estimate for the required notification, reports and records, including the root cause analysis, totals \$3,141 and is based on the time and effort required of a source to review relevant data, interview plant employees, and document the events surrounding a malfunction that has caused an exceedance of an emission limit. The estimate also includes time to produce and retain the record and reports for submission to EPA. EPA provides this illustrative estimate of this burden because these costs are only incurred if

there has been a violation and a source chooses to take advantage of the affirmative defense.

Burden under Affirmative Defense					
(A) Personnel	(B) Number of Personnel	(C) Time Requirement (hours)	(D) Total Hours	(E) Hourly Rate (\$/hr)	(F) Total
Technical Personnel	3	6	18	98.20	\$1,768
Managerial Personnel	2	6	12	114.49	\$1,374
Total	5		30		\$3,141

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of 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 \$50,000.

This cost is based on the average hourly labor rates 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 overhead and fringe benefit costs. Details on the line item estimates used to calculate these burdens are presented in Tables 5 through 8 of Attachment 3.

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

The total number of respondents is also referred to as the respondent universe. Based on research, 17 existing facilities will be subject to the standard. No new respondents will become subject. Industry burden is calculated based on the number of facilities in each subcategory and the anticipated controls and monitoring that each unit will most likely utilize to comply with the proposed emissions guidelines.

Total Annual Responses			
(A) Unit Type	(B) Number of Respondents (facilities)	(C) Total Number Responses for 3- year Period	(D) Average Annual Number of Responses
PVC Facilities Total	17	153	51

The number of average annual responses is 51.

6(e) Bottom Line Burden Hours and Cost Tables

(i) The Respondent Tally

The total annual labor hours are 3,200. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 2. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 63 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$7.4 million. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance Costs.

(ii) The Designated Administrator Tally

The average annual burden over the first three years for the Designated Administrator would be 1,100 hours at a cost of \$50,000 per year. The Designated Administrator burden hours and costs are presented in Tables 5 through 8 of Attachment 3.

6(f) Reasons for change in burden

Since this rule was vacated by the courts, this ICR treats these burden estimates as new burdens and the burden is not compared to previous burden estimates made for the vacated rule.

To provide the public with an estimate of the relative magnitude of the burden associated with a source asserting an affirmative defense position (for those not already regulated under the part 61 NESHAP), EPA is providing an administrative adjustment to this ICR. The adjustment shows the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. This illustrative example does not result in an increase in the burden for this rule. EPA provides this estimate of the burden because these costs are only incurred if the source believes that there has been a violation, and chooses to take advantage of the affirmative defense.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be 63 hours per response. Burden means total time, effort, or financial resources

expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB Control Numbers for EPA regulations are listed in 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-OAR-2002-0037. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2002-0037 in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 63 Subpart HHHHHHH
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RECORDKEEPING

A copy of each notification and report submitted to comply with this subpart	63.11990(a)
Records of storage vessels	63.11990(b)
Records of equipment leaks	63.11990(c)
Records of heat exchanger systems	63.11990(d)
Records of process vents	63.11990(e) and 63.11990(f)
Records of closed vent systems	63.11990(g)
Records of resin strippers	63.11990(e) and 63.11990(h)
Records of process wastewater	63.11990(e) and 63.11990(i)
Keep records for five years	63.11995(a)

REPORTING

Submit an initial notification	63.9(b)
Submit a notification of compliance status	63.11985(a)
Submit a notification of performance test	63.9(e)
Submit a compliance report	63.11985(b)
Submit a notification of inspection	63.11985(c)(1)
Submit a batch precompliance report	63.11985(c)(2)
Submit an affirmative defense report	63.11985(c)(4)

ATTACHMENT 1 (cont.)

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 63 Subpart HHHHHHH
MONITORING	
General Monitoring Requirements	63.11890(c) and 63.11935(a) and 63.11935(b) and 63.11935(c) and 63.11935(d)
Storage Vessel Monitoring	63.11910(a) and 63.11910(c)
Pressure Relief Device Monitoring	63.11915(c)
Heat Exchanger Monitoring	63.11920(a)
Process Vent Control Device Monitoring	63.11925(c) and 63.11925(d) and 63.11925(e) and 63.11925(f) and 63.11940 and 63.11945(a)
Closed Vent System Monitoring	63.11930(c) and 63.11930(d) and 63.11930 (f) and 63.11930 (h)
Ambient Vinyl Chloride Monitoring	63.11956
Resin Stripper Monitoring	63.11960(b) and 63.11960(c)
Wastewater Monitoring	63.11965(a) and 63.11975(a) and 63.11975(d) and 63.11975(e)

ATTACHMENT 2

TABLES 1, 2, 3, and 4

Tables 1 - 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the MACT Floor for Existing Sources: Polyvinyl Chloride and Copolymer Manufacturing Units – Years 1-3

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

ATTACHMENT 3

TABLES 5, 6, 7, and 8

Tables 5 - 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 1-3

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