

## 1SUPPORTING STATEMENT

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS EMISSIONS: GROUP I POLYMERS AND RESINS

#### PART A

##### 1.0 Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

This information collection request (ICR) is entitled "NESHAP for Group I Polymers and Resins (40 CFR part 63, subpart U) (Final Rule)." The EPA tracking number is 2410.02, and the Office of Management and Budget (OMB) number is 2060-0356.

(b) *Short Characterization.*

This ICR covers information collection requirements in the final rulemaking that amend title 40, chapter I, part 63 of the Code of Federal Regulations (CFR) Subpart U National Emission Standards for Hazardous Air Pollutants: Group I Polymers and Resins, hereafter, this subpart is referred to as the "Polymers & Resins I NESHAP". Respondents are owners or operators subject to the new requirements of the NESHAP, which include an estimated 5 existing facilities that produce butyl rubber, epichlorohydrin elastomers, ethylene-propylene rubber, neoprene rubber, and nitrile butadiene rubber. Respondents also include owners or operators of all 19 existing facilities regulated by the Polymers and Resins I NESHAP who may wish to make use of the new affirmative defense provisions in the amendments to the rule.

The final standards add emissions limits for the back-end process operations for the butyl rubber production, epichlorohydrin elastomers production, neoprene rubber production, and nitrile butadiene rubber production categories. The owner or operator is required to calculate and record the organic HAP emissions from all back end process operations as well as the mass of elastomer product produced. The final rule also revises the MACT standards for front-end process vents for the butyl rubber and ethylene propylene rubber source categories adding limits for HCl emissions resulting from the combustion of chlorinated organic compounds. The owner or operator is required to calculate and record the HCl emissions from the front-end process vents as well as the mass of elastomer product produced. Information related to these new

requirements is required to be submitted in the semi-annual reports already required by the existing rule. The final rule also adds provisions for facility owners or operators to use if they wish to claim an affirmative defense against civil penalties for exceedances of emission standards caused by malfunctions. If these provisions are used, the owner or operator is required to meet certain criteria during the malfunction, notify the Administrator of malfunctions that may cause an exceedance of the emissions standards, and submit a report for the malfunction to the Administrator, to include a root cause analysis of the malfunction, within certain timeframes.

Existing major sources subject to the new front-end process vent and back-end operations requirements are required to comply with these requirements within one year of the effective date (promulgation date) of the standards. All existing major sources may use the affirmative defense provisions upon the effective date of the standards. All new or reconstructed affected sources must be in compliance with the existing and new requirements of the Polymers & Resins I NESHAP on the date of startup or the effective date, whichever is later.

The new information collection requirements for existing and new Polymers & Resins I manufacturing sources are listed in Attachment 1.

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

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

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that has the potential to emit more than 10 tons per year [tpy] of any single HAP and more than 25 tpy of any combination of HAP. The Polymers & Resins I source category contains major sources of HAP emissions and is included on EPA's list of categories for regulation. The Polymers & Resins I NESHAP are based on maximum achievable control technology (MACT).

Certain records and reports are necessary for the Administrator to confirm the compliance status of major sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and

40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

*(b) Use/Users of the Data.*

The information will be used by the delegated authority (state agency, or Regional Administrator if there is no delegated state agency) to ensure that the standards and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which facilities, records, or processes may need inspection.

**3. Nonduplication, Consultations, and Other Collection Criteria**

*(a) Nonduplication.*

A computer search of our existing standards and ongoing ICRs revealed no duplication of information gathering efforts. However, certain reports required by State or local agencies may duplicate information required by the standards. In such cases, a copy of the report submitted to the State or local agency can be provided to the Administrator in lieu of the required report.

*(b) Public Notice Required Prior to ICR Submission to OMB.*

This is a rule-related ICR and comments were solicited on the proposal package and the proposed ICR. This ICR contains revisions from the proposed ICR to include burden associated with the provisions for affirmative defense, the notification of facilities' back-end process operations emission limits, and the notification of facilities' front-end process vent HCl emissions limits. The revisions also include the removal of burden associated with performance tests and monitors for the front-end process vents.

*(c) Consultations.* The original rule was developed in consultation with several representatives of the elastomers and synthetic resins industry, environmental organizations, and state/local air pollution control agencies. The key non-EPA persons consulted on the information collection activities during the original rule development are identified in Table 1. No consultations have occurred in the subsequent time periods.

**TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES**

<b>Contact</b>	<b>Title</b>	<b>Company</b>
C.J. Jankowski	Managing Director	International Institute of Synthetic Rubber Producers, Inc.
Alan Rautio	Director	Styrene Butadiene Latex Manufacturers Council
R.D. Hembree	Staff Engineer	Exxon Chemical
George M. Ladzun	Corporate director of Engineering and Operations Support	Zeon Chemicals USA, Inc.
Thomas D. Gentner	Manager, Environmental Affairs	Morton International, Inc.
Jonathon D. Miller	Air Emissions Specialist	DuPont Elastomers
Dave Berkebile	Principal Engineer, Corporate Engineering	The Goodyear Tire and Rubber Co.
David Gustafson	Environmental Air Issues Manager	Dow Chemical
Lloyd J. Tabary	Environmental Manager	DSM Copolymer

*(d) Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) will not be reasonably assured that a facility is in compliance with the standards. In addition, the EPA's authority to take administrative action would be significantly reduced; section 113(d) of the CAA limits the assessment of administrative penalties to violations which occur no more than 12 months before initiation of the administrative proceeding. Since administrative proceedings are less costly and require use of fewer resources than judicial proceedings, both the EPA and the regulated community benefit from preservation of the EPA's administrative powers.

(e) *General Guidelines.*

The Polymers & Resins I NESHAP requires that facility owners or operators retain records for a period of 5 years, which exceeds the 3-year retention period contained in the guidelines in 5 CFR 1320.6. The 5-year retention period is consistent with the subpart A General Provisions of 40 CFR part 63 and the retention requirement in the operating permit program under Title V of the CAA. All subsequent general guidelines have been followed and do not violate any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.6.

(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 Title 40, Chapter 1, Part 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).

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

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

(a) *Respondents/NAICS Codes.*

Potential respondents under Subpart U are owners or operators of any existing or new Polymers & Resins I manufacturing facility that is a major source of HAP emissions. The source category and affected sources regulated by the Polymers & Resins I NESHAP are classified under the Standard Industrial Classification (SIC) code 2822, for synthetic rubber manufacturing. The corresponding North American Industrial Classification System (NAICS) code is 325212, for synthetic rubber manufacturing.

According to information included in recent Federal Register notices related to Residual Risk analyses<sup>1</sup>, the Polymers & Resins I source category is estimated to consist of 19 existing facilities nationwide, all of which are major sources and would be subject to the major source provisions specified under the Polymers & Resins I NESHAP. We estimate 5 facilities will be subject to the new requirements of the NESHAP. All 19 existing facilities could make use of the

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<sup>1</sup> 72 FR 70543, December 12, 2007; and 73 FR 60432, October 10, 2008.

new affirmative defense provisions added to the rule. No new major sources are projected during the 3-year period of this ICR.

*(b) Information Requested.*

*(i) Data Items, Including Recordkeeping Requirements.* Attachment 1, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Polymers & Resins I source category.

*(ii) Respondent Activities.* The respondent activities that are required by the Polymers & Resins I NESHAP are identified in Table 2 (located at the end of this supporting statement) and are introduced in section 6(a).

*(iii) Summary of Requirements.* Facilities subject to the new requirements for front-end process vents are required to provide a notification of their front-end process vent HCl emissions limit and perform and record monthly calculations of HCl emissions and the mass of elastomer product produced. Facilities subject to the new requirements for back-end process operations are required to provide a notification of their back-end limit and perform and record monthly calculations of HAP emissions and the mass of elastomer product produced. Information related to these new requirements is required to be submitted in the semi-annual reports already required by the existing rule.

EPA is including in Table 3 (located at the end of this supporting statement) an estimate of the burden associated with performing an affirmative defense. 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.

This illustrative estimate is not considered a duplicate estimate of cost under the General Duty to Minimize Emissions clause under 63.6(e)(1)(i), which states: “At all times, the owner and operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determining whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the

source.”

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, EPA provides an administrative adjustment to this ICR that estimates the costs of the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. EPA’s estimate for the required notification, reports and records, including the root cause analysis, associated with a single incident totals approximately \$1,113 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 records 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.

Of the number of excess emission events reported by source operators, only a small number would be expected to result from a malfunction, and only a subset of excess emissions caused by malfunctions would result in the source choosing to assert the affirmative defense. Thus we believe the number of instances in which source operators might be expected to avail themselves of the affirmative defense will be extremely small. For this reason, we estimate no more than 2 or 3 such occurrences for all sources within a given category over the 3-year period covered by this ICR. For the purpose of this estimate, we are adding two (2) instances of affirmative defense. We expect to gather information on such events in the future and will revise this estimate as better information becomes available.

## **5. The Information Collected—Agency Activities, Collection Methodology, and Information Management**

### *(a) Agency Activities.*

The Agency activities associated with the Polymers & Resins I NESHAP are provided in Table 4 (located at the end of this supporting statement) and are introduced in section 6(c).

### *(b) Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The performance

test notifications and reports required under the final rule are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the state agency is delegated authority to implement the rule. Therefore, information contained in the reports submitted to the Regional Administrator will be 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.

*(c) Small Entity Flexibility.*

The Small Business Administration defines a small entity as one that meets the Small Business Administration size standards for small businesses found at 13 CFR 121.201 (less than 1000 employees for NAICS 325212). We estimate that none of the facilities affected by the new requirements are small entities. Accordingly, the rule does not impose significant economic impact on a substantial number of small businesses, and small business considerations do not apply.

*(d) Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 2 for the Polymers & Resins I source category.

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

*(a) Estimating Respondent Burden.*

The annual burden estimates for the Polymers & Resins I NESHAP are shown in Table 2. These numbers were derived from estimates based on EPA's experience with this and other standards. No burden estimates are provided for new sources because no new facilities are expected to become affected sources during the 3year period of this ICR.

*(b) Estimating Respondent Costs.*

The information collection activities for the Polymers & Resins I NESHAP are presented in Table 2. Because the facilities are already in compliance with the existing rule, and no new

sources are expected within the next 3 years, no respondent development costs are associated with the information collection activities.

Information collection requirements for one-time-only reports are included in the burden calculations because five facilities are required to submit one-time-only notifications of their back-end process limit and three facilities are required to submit one-time-only notifications of the front-end process vents HCl emissions limit. The estimates of total technical-hours per year per source and the number of activities per respondent per year listed in Table 2 are based upon experience with similar information collection requirements in the HON and on the number of emission points in each source.

(i) *Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from United States Department of Labor, Bureau of Labor Statistics for NAICS 325200, May 2009 information, available at [http://www.bls.gov/oes/current/naics4\\_325200.htm](http://www.bls.gov/oes/current/naics4_325200.htm). Wages for technical labor are based on "Production occupations: Chemical Equipment Operators & Tenders" with a total compensation of \$23.38/hour. Wages for management labor are taken from "Production occupations: First-line supervisors/managers of production and operating workers" with a total compensation of \$31.20/hour. Wages for clerical labor are based on "Office and administrative support occupations: Office clerks general" with a total compensation of \$14.22/hour. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$49.10, management at \$65.52, and clerical at \$29.86.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The final standards do not include any capital or operations and maintenance costs because no monitoring or other equipment is required by the amendments to the rule.

(iv) *Affirmative Defense, Root Cause Analysis, and Malfunction Costs.* EPA's estimate for a affirmative defense and root cause analysis is based on general experience to calculate the time and effort required of a source to review relevant data, interview plant employees, and

reconstruct the events prior to a malfunction in order to determine primary and contributing causes. The level of effort also includes time to produce and retain the report in document form so that the source will have it available should EPA or state enforcement agencies ever request to review it.

*(c) Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Table 4.

The Agency labor rates are from the Office of Personnel Management (OPM) 2009 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2009-GS available on the OPM website, [http://www.opm.gov/flsa/oca/09tables/html/gs\\_h.asp](http://www.opm.gov/flsa/oca/09tables/html/gs_h.asp). The government employee labor rates are \$15.40/hour for clerical (GS-6, Step 3), \$28.45 for technical (GS-12, Step 1), and \$38.35/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$24.64; technical at \$45.52, and management at \$61.36.

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

There are an estimated 5 existing facilities that will be subject to the new provisions of the Polymers & Resins I NESHAP. No new sources are expected during the next 3 years. While all 19 existing facilities could make use of the new affirmative defense provisions added to the rule, EPA estimates only two total instances of the use of these provisions from all 19

facilities over the three year ICR period. Consequently, the average annual number of Polymers & Resins I manufacturing facility respondents during the 3-year period of this ICR is 5.

For the Polymers & Resins I NESHAP, the components of the total annual responses attributable to this ICR are one-time notifications of performance tests and performance test reports for two respondents. For five respondents, a notification of the back-end process limit, recordkeeping, and a small amount of additional information will be required to be added to the semiannual reports already required for these respondents. As these reports are already required by the existing rule, they are not included in this ICR. The number of total annual responses for subpart U is estimated as: 3.

*(e) Bottom Line Burden Hours and Cost Tables.*

*(i) Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The annual burden for the recordkeeping and reporting requirements for the 5 existing facilities subject to the new back-end operations and front-end process vent requirements and the 19 existing facilities subject to the new affirmative defense provisions of the Polymers & Resins I Manufacturing NESHAP is 251 person-hours, with an annual labor cost of \$12,222 and annualized capital costs of \$0.

*(ii) The Agency tally.* The average annual Federal Government cost is \$408 for 9 hours for the new requirements of subpart U. The bottom line Agency burden hours and costs presented in Table 4 (located at the end of this supporting statement) are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

*(iii) Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

*(f) Reasons for Change in Burden.*

We are requesting an increase in burden of 251 hours due to implementation of the new provisions of this regulation. EPA provides an adjustment to this ICR that estimates the costs of the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. EPA's estimate for the required notification, reports and records, including the root cause analysis, associated with a single incident totals approximately \$1,670 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 records and reports for submission to EPA. For the purpose of estimating the annual burden, EPA is attributing a total of 2 instances of affirmative defense over a three year period across all sources in the category. EPA is using this frequency of 2 events in three years because, of the number of excess emission events reported by source operators, only a small number would be expected to result from a malfunction, and only a subset of excess emissions caused by malfunctions would result in the source choosing to assert the affirmative defense. Thus, we believe the number of instances in which source operators might be expected to avail themselves of the affirmative defense will be extremely small.

*(g) Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 84 hours per response. The average annual respondent burden for the new Polymers & Resins I Manufacturing NESHAP requirements is estimated at 50 hours.

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

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2010-0600, which is available for online viewing at

<http://www.regulations.gov>, or in person viewing at the Air and Radiation 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in one of the Docket ID Numbers identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the relevant Docket ID Number EPA-HQ-OAR-2010-0600 and OMB Control Number 2060-NEW in any correspondence.

#### **PART B**

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

TABLE 2. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE FINAL STANDARD

	(A) Person- hours per occurrence (a)	(B) No. of occurrences per source per year (b)	(C) Person-hours per source per year (C=AxB)	(D) Sources per year	(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,\$ (c)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	See 5F							
4. Reporting Requirements								
A. Read instructions (d)	3.20	20.0	64.0	0.0	0.0	0.0	0.0	\$ -
B. Required activities								
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Semi-annual compliance reports	40.00	2.0	80.0	0.0	0.0	0.0	0.0	\$ -
Leak detection and repair reports	24.00	2.0	48.0	0.0	0.0	0.0	0.0	\$ -
Front-end limit notification	4.00	1.0	4.0	1.0	4.0	0.2	0.4	\$ 221
Back-end limit notification	4.00	1.0	4.0	1.7	6.7	0.3	0.7	\$ 369
Performance test notification (e)	2.00	1.0	2.0	0.0	0.0	0.0	0.0	\$ -
Performance test report (e)	8.00	1.0	8.0	0.0	0.0	0.0	0.0	\$ -
Affirmative defense (f)	30.00	1.0	30.0	0.7	12.0	8.0	0.0	\$ 1,113
Other reports ( e.g., quarterly periodic reports where a respondent did not qualify for semiannual reporting)	8.00	1.0	8.0	0.0	0.0	0.0	0.0	\$ -
					22.7	8.5	1.1	
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Plan Activities (d)	2.00	20.0	40.0	0.0	0.0	0.0	0.0	\$ -
Create, Test, Research, Develop (d)	18.00	80.0	1440.0	0.0	0.0	0.0	0.0	\$ -
Gather information, Monitor, Inspect	1.00	12.0	12.0	5.0	60.0	3.0	6.0	\$ 3,322
Process, Compile, Review	1.00	12.0	12.0	5.0	60.0	3.0	6.0	\$ 3,322
F. Time to train personnel (d)	3.00	10.0	30.0	0.0	0.0	0.0	0.0	\$ -
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A							
H. Time to Record and disclose information	1.00	2.0	2.0	5.0	10.0	0.5	1.0	\$ 554
Store, file and maintain records	1.00	12.0	12.0	5.0	60.0	3.0	6.0	\$ 3,322
I. Time for audits	N/A							
					190.0	9.5	19.0	
TOTAL ANNUAL BURDEN AND COST (SALARY)					212.7	18.0	20.1	\$ 12,222
TOTAL ANNUAL NUMBER OF RESPONSES								3
CAPITAL AND O&M COSTS:								
Total annual capital	0.00							\$ -
ANNUALIZED CAPITAL COSTS:								
Total annualized capital	0.00							\$ -
ANNUAL O&M COSTS	0.00							\$ -
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$ -

N/A = Not Applicable.

(a) Estimate of burden for each activity

(b) Estimate based on average facilities, as per original P&R ICR

(c) Costs are based on the following hourly rates: technical at \$49.10, management at \$65.52, and clerical at \$29.86

(d) One-time occurrence, assumed to have already occurred for existing sources. No new sources are expected during the 3-yr ICR period.

(e) 3 new tests required by proposed rule

(f) Assumes 2 affirmative defense reports for entire industry during the 3-yr ICR period. Formulas are not followed for person-hours per year. For affirmative defense, hours required assumes 18 hours technical, 12 hours management, 0 clerical for each instance of affirmative defense.

**TABLE 3. SINGLE AFFIRMATIVE DEFENSE BURDEN ESTIMATE**

Personnel	Number of Personnel	Time Requirement (hours)	Total Hours	Hourly Rate (\$/hr)	Total
Technical Personnel	3	6	18	49.10	\$ 884
Managerial Personnel	2	6	12	65.52	\$ 786
Total	5		30		\$1,670

**TABLE 4. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE FINAL STANDARDS**

	(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	(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,\$ (a)
Activity			(C=AxB)				(Ex0.1)	
Performance Tests: Initial	40	1	40.0	0	0.0	0.0	0.0	\$0
Performance Tests: Repeat	40	1	40.0	0	0.0	0.0	0.0	\$0
Litigation (c)	2080	0	0.0	0	0.0	0.0	0.0	\$0
Reports Review:								
Compliance status (b)	40.0	0	0.0	0	0.0	0.0	0.0	\$0
Review equipment leak monitoring (c)	7.0	2	14.0	0	0.0	0.0	0.0	\$0
Notification of front-end operations limit (b)	3.0	1	3.0	1	3.0	0.2	0.3	\$153
Notification of back-end operations limit (b)	3.0	1	3.0	2	5.0	0.3	0.5	\$255
Notification of construction/reconstruction (b)	6.0	0	0.0	0	0.0	0.0	0.0	\$0
Notification of anticipated startup (b)	6.0	0	0.0	0	0.0	0.0	0.0	\$0
Notification of actual startup (b)	6.0	0	0.0	0	0.0	0.0	0.0	\$0
Notification of performance test (b)	6.0	1	6.0	0	0.0	0.0	0.0	\$0
Review of test results (b)	24.0	1	24.0	0	0.0	0.0	0.0	\$0
Review periodic reports	3.0	2	6.0	0	0.0	0.0	0.0	\$0
Review other reports (d)	6.0	1	6.0	0	0.0	0.0	0.0	\$0
TOTAL BURDEN AND COST (SALARY)					8.0	0.4	0.8	\$408

(a) Costs are based on the following hourly rates: technical at \$45.52, management at \$61.36, and clerical at \$24.64.

Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) One-time occurrence, only applies to sources subject to newly proposed standards. There are 5 notifications of back-end limits expected. There are 3 notifications of front-end limits expected.

(c) Represents the cost of litigating an average of 1 case per year. It is assumed that there will be no more litigation.

(d) Examples of these reports include quarterly periodic reports where a respondent did not qualify for semiannual reporting

**ATTACHMENT 1. INFORMATION REQUIREMENTS--NESHAP FOR POLYMERS AND RESINS I MANUFACTURING**

<b>Requirement</b>	<b>Citation for existing sources</b>	<b>Citation for new sources</b>	<b>General Provisions citation</b>
<b><i>Notifications</i></b>			
Notification of front-end process vent HCl limit	§63.485(q)	§63.485(q)	N/A
Notification of back-end limit	§63.499(f)(1)	§63.499(f)(1)	N/A
<b><i>Records</i></b>			
Records of notifications	§63.506(e)	§63.506(e)	40 CFR 63.10
Records that demonstrate continuous compliance	§63.498(a)(4), §63.498(e), §63.506(d)	§63.498(a)(4), §63.498(e), §63.506(d)	40 CFR 63.10
<b><i>Reports</i></b>			
Back-end process vents records in periodic reports	§63.499(f), §63.506(e)(6)	§63.499(f), §63.506(e)(6)	N/A
Front-end process vents records in periodic reports	§63.506(d), §63.506(e)(6)	§63.506(d), §63.506(e)(6)	N/A
Reports of malfunctions that result in an exceedances of the standard for the purpose of affirmative defense	§63.480(j)(4)	§63.480(j)(4)	N/A