

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal), EPA ICR Number 1983.06, OMB Control Number 2060-0489.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Generic Maximum Achievable Control Technology (MACT) Standards, involving production for: Carbon Black (CB), Cyanide (CY), Ethylene (ET), and Spandex (SP) (40 CFR part 63, subpart YY) were promulgated on July 12, 2002 (67 FR 46258) and amended on April 13, 2005 (70 FR 19266). These regulations apply to existing facilities and new facilities that would be subject to the major source provisions specified under the Generic MACT (GMACT) NESHAP. This information is being collected to assure compliance with 40 CFR part 63, subpart YY.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

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

Over the next three years, an average of 72 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. This consists of: 18 existing facilities for the CB production source category, 14 facilities for the CY production source category, 37 facilities for the ET production source category and 3 facilities in the SP production source category.

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

When this ICR is renewed, EPA should review the respondent burden, universe, response number, labor rates, and capital costs and ensure these estimates have been updated.

The EPA has addressed each item in the TOC by consulting with industry representatives. See section 3(c) of this ICR for more details. EPA has also updated the labor rates using the most recent data from the Bureau of Labor Statistics.

All 72 carbon black, ethylene, cyanide, and spandex facilities in the United States are owned and operated by the carbon black, ethylene, cyanide, and spandex industry (the “Affected Public”). All of these facilities are privately-owned, for-profit businesses; none of them are owned by either state, local, tribal or the Federal government. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found below in Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal).

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

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

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, 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 CB production, CY chemicals manufacturing, ET production, and SP production source categories cause or contribute to air

pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart YY.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard ensures compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard(s). Continuous emission monitors are used to ensure compliance with the standard(s) at all times.

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

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart YY.

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted 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 Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Continental Carbon Company at (281) 647-3700, and the Syngenta Corporation at (302) 425-2000. In this case, one comment was received indicating the estimate of the affected number of sources subject to the standard and information on the expected growth rate of the industry had not changed.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **3(d) Effects of Less Frequent Collection**

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

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902,

September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### 3(g) Sensitive Questions

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

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The Standard Industrial Classification (SIC) codes and the corresponding The North American Industry Classification System (NAICS) for the respondents affected by the standards are shown in the table below.

Standard Source Category	SIC Codes	NAICS Codes
Carbon Black	2895	325182
Cyanide	2819/2869	325188/325199
Ethylene	2869	325110
Spandex	2824	325222

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Source Categories: MACT for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY).

A source must make the following reports:

Notifications/Reports	
Notification and application of construction or modification.	63.5
Notification of anticipated date of initial startup.	63.5
Initial Notification	63.1110(a), 63.1110(c)
Initial Compliance Status Report	63.1110(a), 63.1110(d)
Notification of performance evaluation and performance test dates	63.1110(a)
Performance test and performance evaluation results	63.1090, 63.1110(d)
Startup, shutdown, and malfunction reports	63.1110(a), 63.1111
Excess emissions and CPMS performance report	63.1110(a)
Excess emissions and CPMS performance summary report	63.1110(a)
Operating parameter value and rationale selection	63.1110(a), 63.1111

<b>Notifications/Reports</b>	
Conduct control device performance test	63.987(c), 63.988(b) 63.989(b), 63.990(b) 63.991(b), 63.992(b) 63.993(b), 63.994(b) 63.995(b)
Conduct CPMS performance evaluation	63.996(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of maintenance	63.1088(b), 63.1089, 63.1090(c), 63.1109(a)
Records of startup, shutdown and malfunction and actions taken	63.998(d)
Records of malfunctioning or inoperative CPMS	63.998(c)
Records of CPMS operation, adjustments, calibration checks, and maintenance	63.998(c)
Records of performance test and performance evaluation results	63.998(a)
Records of initial and compliance status notifications	63.998(a)

### Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 20 percent of the respondents use electronic reporting.

<b>(ii) Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CPMS for the appropriate control device
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

### **5(a) Agency Activities**

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

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

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

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the OTIS 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 OTIS 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**

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

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal).

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

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the GMACT included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 13,524 ( Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.



## 6(b) Estimating Respondent Costs

### (i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$121.42 (\$57.82 + 110%)
Technical	\$99.14 (\$47.21 + 110%)
Clerical	\$49.81 (\$23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

### (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Source Category with Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CB	N/A	0	\$0	9,545	18	\$171,810
CY	N/A	0	\$0	9,545	14	\$133,630
ET	N/A	0	\$0	734	37	\$27,158
SP	N/A	0	\$0	8,811	3	\$26,433
TOTAL	-	0	\$0	-	72	\$359,031

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

The total operation and maintenance (O&M) costs consists of photocopying, and postage are \$359,031. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$359,031.

### 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 \$183,686.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR part 63, subpart YY) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 72 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 72 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	72	0	0	72
2	0	72	0	0	72
3	0	72	0	0	72
Average	0	72	0	0	72

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 72.

The total annual labor costs are \$1,295,805. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal).

The number of Total Annual Responses is 151. The annual response per year is calculated using Table 1 below.

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

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

#### **(i) Respondent Tally**

The total annual labor hours are 13,524. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 90 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$359,031.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 4,076 labor hours at a cost of \$183,686. See below Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal).

### **6(f) Reasons for Change in Burden**

The increase in burden from the most recently approved ICR is due to adjustments. The adjustment increase in burden costs for both the respondents and the Agency is due to an update in labor rates. Despite the increase in burden costs, there is a decrease in the respondent labor hours (9 hours) in this ICR compared to the previous ICR due to a mathematical error in determining the person hours per respondent.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 90 hours per response. 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 valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2011-0235. 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) 566-1752. 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-OECA-2011-0235 and OMB Control Number 2060-0489 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Annual Respondent Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. REPORTING REQUIREMENTS								
a. Read Instructions	1	1	1	0	0	0	0	\$0.00
b. Required Activities								
Initial Performance Tests	57	1	57	0	0	0	0	\$0.00
Repeat of Performance Tests	57	0.1	5.7	0	0	0	0	\$0.00
Periodic Performance Tests	40	1.2	48	43.2	2,073.6	103.68	207.36	\$228,494.13
Repeat of Performance Tests	40	0.2	8	43.2	345.6	17.28	34.56	\$38,073.35
Startup, Shutdown and Malfunction Plan	40	1	40	72	2,880	144	288	\$317,352.96
Operations and Maintenance Plan	40	1	40	72	2,880	144	288	\$317,352.96
Visual Emissions and Opacity Monitoring	0.1	13	1.3	72	93.6	4.68	9.36	\$10,313.97
c. Create Information	-----Included in 3b-----							\$0.00
d. Gather Existing Information	-----Included in 3b-----							\$0.00
e. Write Report								
Notification of Applicability	2	1	2	0	0	0	0	\$0.00
Notification of Construction/Reconstruction	2	1	2	0	0	0	0	\$0.00
Notification of Actual Startup	2	1	2	0	0	0	0	\$0.00
Request for Extension of Compliance	2	1	2	0	0	0	0	\$0.00
Notification of Special Compliance Requirements	2	1	2	0	0	0	0	\$0.00

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REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
Notification of Performance Test	2	1.5	3	43.2	129.6	6.48	12.96	\$14,280.88
Notification of Opacity and Visible Emissions Observation	2	1.5	3	43.2	129.6	6.48	12.96	\$14,280.88
Notification of the Continuous Emission Monitor Performance Evaluation	2	1	2	0	0	0	0	\$0.00
Notification of Compliance Status	2	1	2	0	0	0	0	\$0.00
Notification of Adjustments to Time Periods or Postmark Deadlines for Submittal and Review of Required Communications	2	1	2	0	0	0	0	\$0.00
Notification of Change in Information Already Provided	2	1	2	0	0	0	0	\$0.00
Report of Initial Performance Tests	8	1.1	8.8	0	0	0	0	\$0.00
Report of Periodic Performance Tests	8	1.5	12	43.2	518.4	25.92	51.84	\$57,123.54
Opacity and Visible Emissions Observations	-----Included in 3b-----							\$0.00
Reporting Results of Continuous Monitoring System Performance Report and Summary Report	-----Included in 3b-----							\$0.00
Progress Reports	8	2	16	0	0	0	0	\$0.00

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Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	8	3	24	72	1,728	86.4	172.8	\$190,411.78
Periodic Startup, Shutdown, Malfunction Report	-----Included in Excess Emissions Report-----							\$0.00
Immediate Startup, Shutdown, Malfunction Reports	4	2	8	3.4	27.2	1.36	2.72	\$2,997.22
Request for Waiver of Reporting and Recordkeeping	4	1	4	0	0	0	0	\$0.00
<b>Reporting Subtotal</b>					<b>12,426.44</b>			
<b>4. RECORDKEEPING REQUIREMENTS</b>								
a. Read Instructions	-----Included in 3b-----							\$0.00
b. Plan Activities	-----Included in 3b-----							\$0.00
c. Implement Activities	-----Included in 3b-----							\$0.00
d. Develop Record System	N/A							
e. Time to Enter Information								
Records of All Information Required by Standards	0.25	53	13.25	72	954	47.7	95.4	\$105,123.16
f. Train Personnel	N/A							
g. Audits	N/A							
<b>Recordkeeping Subtotal</b>					<b>1,097.1</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>					<b>13,524</b>			<b>\$1,295,805</b>

**Assumptions**

Number of affected facilities*	72
Time required to read instructions (hours)	1
Time required to complete performance test (hours)	57
Periodic performance test (hours)	40
Performance test reports (hours)	8
Rate of failed performance tests (repeat)	10%
Periodic performance tests (every five years and every 30 minutes) = 60%	43.2
Estimated hours to prepare the Startup/Shutdown/Malfunction	40
Time required to conduct visual and opacity monitoring	0.1
Estimated number of sources at an affected facility that require visual emissions and opacity	72
Time required to prepare notifications (hours)	2
Number of new facilities (per year)	0
Time required to prepare progress reports (hours)	8
Time required to prepare excess emissions reports (hours)	8
Time required to prepare immediate startup, shutdown, and malfunction reports (hours)	4
Time required to file information required by standard (hours)	0.25
Technical labor rate	\$99.14
Managerial labor rate	\$121.42
Clerical labor rate	\$49.81

\* Affected facilities consist of 18 manufacturing carbon black, 14 manufacturing cyanide, 37 manufacturing ethylene, and 3 manufacturing spandex.

N/A = Not Applicable.



**Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
<b>INITIAL PERFORMANCE TESTS</b>								
New or Modified Facility	5	1	5	0	0	0	0	\$0.00
Repeat of Performance Tests	5	0.1	0.5	0	0	0	0	\$0.00
<b>PERIODIC PERFORMANCE TESTS</b>								
Existing Facility	5	1	5	43.2	216	10.8	21.6	\$11,194.10
Repeat of Performance Tests	5	0.1	0.5	4.3	2.15	0.11	0.22	\$111.70
<b>REPORT REVIEW</b>								
Notification of Applicability	2	1	2	0	0	0	0	\$0.00
Notification of Construction/Reconstruction	2	1	2	0	0	0	0	\$0.00
Notification of Actual Startup	2	1	2	0	0	0	0	\$0.00
Request for Extension of Compliance	2	1	2	0	0	0	0	\$0.00
Notification of Special Compliance Requirements	2	1	2	0	0	0	0	\$0.00
Notification of Performance Test	2	1.1	2.2	43.2	95.04	4.75	9.5	\$4,925.17
Notification of Opacity and Visible Emissions Observation	2	1	2	43.2	86.4	4.32	8.64	\$4,477.64
Notification of the Continuous Emission Monitor Performance Evaluation	2	1	2	0	0	0	0	\$0.00
Notification of Compliance Status	2	1	2	0	0	0	0	\$0.00
Notification of Adjustments to Time Periods or Postmark Deadlines for Submittal and Review of Required Communications	2	1	2	0	0	0	0	\$0.00
Notification of Change in Information	2	1	2	0	0	0	0	\$0.00

**Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
Already Provided								
Review Operations and Maintenance Plan	40	1	40	0	0	0	0	\$0.00
Review Report of Initial Performance Test	5	1.1	5.5	0	0	0	0	\$0.00
Review Report of Periodic Performance Test	5	1.1	5.5	43.2	237.6	11.88	23.76	\$12,313.51
Review Opacity and Visual Emission Observation Report	-----Included in Review of Performance Test Report-----							\$0.00
Review Reporting Results of Continuous Monitoring System Performance Report and Summary Report	-----Included in Review of Performance Test Report-----							\$0.00
Review Progress Reports	-----Included in Review of Performance Test Report-----							\$0.00
Review Excess Emission Report and Continuous Monitoring System Performance Report and Summary Report	20	2	40	72	2,880	144	288	\$149,254.56
Review Periodic Startup, Shutdown, Malfunction Report	-----Included in Review of Performance Test Report-----							\$0.00
Review Immediate Startup, Shutdown, Malfunction Report	8	1	8	3.4	27.2	1.36	2.72	\$1,409.63
Review Request for Waiver of Reporting and Recordkeeping	2	1	2	0	0	0	0	\$0.00
Subtotal					3,544.39	177.22	354.44	\$183,686.31

**Table 2: Annual Agency Burden and Cost - NESHAP for Carbon Black, Ethylene, Cyanide, and Spandex (40 CFR Part 63, Subpart YY) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
TOTAL						4,076		\$183,686

**Assumptions**

Number of affected facilities *	72
Time required to review notifications (hours)	2
Time required to oversee performance test (hours)	5
Time required to review performance test report (hours)	5
Rate of failed performance tests (repeat)	10%
Periodic performance tests (every five years and every 30 minutes) = 60%	43.2
Estimated number of performance tests per facility	10
Operations and Maintenance Plan (hours)	40
Time required to review Excess Emissions Report, Continuous Monitoring Reports, and Summary Reports (hours)	20
Estimated number of immediate startup/shutdown/malfunction reports submitted to EPA (per facility)	5
Time required to review the immediate startup/shutdown/malfunction report (hours)	8
Time required to review existing plant emission reports (hours)	4
EPA Managerial Labor Rate	\$62.27
EPA Technical Labor Rate	\$46.21

**Assumptions**

EPA Clerical Labor Rate	\$25.01
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\* Affected facilities consist of 18 manufacturing carbon black, 14 manufacturing cyanide, 37 manufacturing ethylene, and 3 manufacturing spandex.