

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal),
EPA ICR Number 1811.07, OMB Control Number 2060-0415.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyether Polyols Production published at (40 CFR part 63 subpart PPP) were proposed on September 4, 1997 (62 FR 46818), and promulgated on June 1, 1999 (64 FR 29419). These regulations apply to existing facilities and new facilities that engage in the manufacture of polyether polyols (which also include polyether mono-ols) and emit hazardous air pollutants (HAP). New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart PPP.

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 U.S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 83 respondents per year will be subject to the standard, and one additional respondent will become subject to the standard every three years.

All 83 polyether polyol production facilities in the United States are owned and operated by the polyether polyol production industry (the "Affected Public") All of these facilities are privately-owned, for profit businesses; none of them are owned by 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal). The burden to the "Federal Government" is attributed entirely to work performed by either Federal employees or government contractors, this burden may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether

Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

The active (previous) 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”.

EPA addressed each item of concern in the TOC by revising these factors with the most current information available.

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 polyether polyols production cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart PPP.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. 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. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard(s) 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, leaks are being detected and repaired, and the standard(s) are 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 PPP.

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. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is the EPA database for the

collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Arch Chemicals Incorporated, at (270) 422-2101, and the Dow Chemical Company, at (989) 832-1556. No comments were received.

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.

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 the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond 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 respondents to the recordkeeping and reporting requirements are polyether polyols production facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below for polyether polyols production facilities.

Standard (40 CFR part 63, subpart PPP)	SIC Codes	NAICS Codes
Surface Active Agent Manufacturing	2834	325613
All Other Basic Organic Chemical Manufacturing	2869	325199

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP).

A source must make the following reports:

Notifications	
Notification of Applicability	63.9(a)
Construction/reconstruction notification	63.5(d), 63.1439(b)(2)
Initial notifications	63.1439(e)(3)
Notification of Actual startup	63.5(b)(4)
Notification of Performance Test	63.1437(a)
Initial performance test results	63.7(g), 63.1439(e)(5-6)
Rescheduled initial performance test	63.1437(a)(4)
Compliance status	63.1430(g), 63.1439(e)(5)
Physical or operational change	63.1, 63.1420(g)(4), 63.1430(i), 63.1439(e)(7)(iii)
Periodic start-up, shutdown, malfunction reports	63.10(d)(5)
Periodic reports	63.1439(e)(4)

A source must keep the following records:

Recordkeeping	
Start-ups, shutdowns, malfunctions, periods	63.1439(b)(1)
All reports and notifications from Table above	See above
Record of applicability	63.10(b)(3), 63.1420(b)(1)(i)
Records for sources with continuous monitoring systems	63.1430(c-f)
Records are required to be retained for 5 Years.	63.1439(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.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous parametric monitoring system (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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS 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 for five years.

5(c) Small Entity Flexibility

A 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 requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 each of subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 13,189 (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 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) 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)
Process vent monitoring equipment	N/A ^a	1	\$205,488 ^a	\$0	83	\$0

^a The capital costs, assumed to be a one-time cost for the life of the equipment, were estimated to be \$9,385. The total capital costs for the period covered by this ICR are therefore the previous capital costs and the one new source cost multiplied by the capital recovery factor (82 existing sources + one new source) x \$9,385/source x 0.2638 = \$205,488.

The total capital/startup costs for this ICR are \$205,488. This is the total of column D in the above table.

There are no operation and maintenance (O&M) costs for this ICR.

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 \$205,488.

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 \$21,144.

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: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 83 existing respondents will be subject to the standard. It is estimated that an additional one respondent will become subject every three years. The overall average number of respondents, as shown in the table below, is 83 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0.33	83	0	0	83.33
2	0.33	83.33	0	0	83.66
3	0.33	83.66	0	0	83.99
Average					83 ²

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

² This ICR assumes on average 83 respondents are subject to the standard during the three-year period of the ICR. However, the number of respondents may be between 83 and 84 depending on when the construction of the new source (or modification of an existing source) occurs during the three-year period.

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 83.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of applicability	1	1	N/A	1
Notification of construction / reconstruction	1	1	N/A	1
Notification of actual startup	1	1	N/A	1
Initial notification	1	1	N/A	1
Performance test notification	1	1	N/A	1
Compliance status notification	1	1	N/A	1
Performance test reports	1	1	N/A	1
Startup/shutdown/malfunction reports	1	1	N/A	1
Semi-annual summary reports	83	2	N/A	166
Notification of physical/operation changes	8	1	N/A	8
			Total	182

The number of Total Annual Responses is 182.

The total annual labor costs are \$1,263,792. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

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 below in Tables 1 and 2 (below), respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 13,189. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 72 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$205,488. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 469 labor hours at a cost of \$21,144. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment increase in burden hours from the most recently approved ICR is due to an increase in the number of sources subject to the standard. The increase in costs reflects updated labor rates for both the respondents and Agency.

There is also an increase in the capital/startup costs in this ICR compared to the previous ICR due to an increase in the number of affected sources. The previous ICR estimates annualized capital/startup costs for existing and new facilities. This ICR reflects the on-going annualized capital/startup costs for all facilities including new facilities that have become subject to the standard in the past three years.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 72 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-2011-0244. 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-2011-0244 and OMB Control Number 2060-0415 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

Burden Item	A Person hours per occurrence	B Annual occurrences per respondent	C Annual person hours per respondent	D Total Number of respondents ^a	E Technical hours per year (C x D)	F Managerial hours per year (E x 0.05)	G Clerical hours per year (E x 0.10)	H Total annual cost (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Read rule and instructions ^c	1	1	1	1	1	0.05	0.1	\$110.19
b. Required activities								
i. Initial performance test - process vents ^d	480	1	480	1	480	24	48	\$52,892.16
ii. Initial performance test – wastewater e	160	1	160	1	160	8	16	\$17,630.72
c. Write reports								
i. Notification of applicability	2	1	2	1	2	0.1	0.2	\$220.38
ii. Notification of construction/ reconstruction	2	1	2	1	2	0.1	0.2	\$220.38
iii. Notification of actual startup	2	1	2	1	2	0.1	0.2	\$220.38
iv. Initial notification ^f	14	1	14	1	14	0.7	1.4	\$1,542.68
v. Performance test notification	2	1	2	1	2	0.1	0.2	\$220.38
vi. Compliance status notification	2	1	2	1	2	0.1	0.2	\$220.38
vii. Performance test reports ^g	80	1	80	1	80	4	8	\$8,815.36
viii. Startup/shutdown/malfunction reports	2	1	2	1	2	0.1	0.2	\$220.38
ix. Semiannual summary report ^h	20	2	40	83	3,320	166	332	\$365,837.44
x. Notification of physical/operational change	2	1	2	8	16	0.8	1.6	\$1,763.08
Subtotal for Reporting						4,695.45		

4. Recordkeeping requirements								
a. Read rule and instructions	See 3A							
b. Develop Record System	40	1	40	1	40	2	4	\$4,407.68
c. Time to train personnel	40	1	40	1	40	2	4	\$4,407.68
d. Continuously Monitored parameter	See 3C							\$0.00
e. Leak Detection and repair (LDAR) program ^j	88	1	88	83	7,304	365.2	730.4	\$804,842.36
f. SS&M Plan	2	1	2	1	2	0.1	0.2	\$220.38
Subtotal for Recordkeeping					8,493.9			
					11,469	573.45	1,146.9	\$1,263,792.01
TOTAL LABOR BURDEN AND COST (rounded)					13,189			\$1,263,792

Assumptions

^a We have assumed that the average number of respondents that will be subject to the rule will be 83 sources, with one additional source over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$121.42 per hour for Executive, Administrative, and Managerial labor; \$99.14 per hour for Technical labor, and \$49.81 per hour for Clerical labor. 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% to account for the benefit packages available to those employed by private industry.

^c We have assumed that there will be one new source expected over the three-year period of this ICR.

^d We have assumed that it will take 480 hours to complete the initial performance test for process vents.

^e We have assumed that it will take 160 hours to complete the initial performance test for wastewater.

^f We have assumed that it will take 14 hours to complete the initial notification.

^g We have assumed that it will take 80 hours to complete the performance test report.

^h We have assumed that it will take 20 hours twice per year for each respondent to complete the semiannual summary report.

ⁱ We have assumed that it will take 2 hours once per year to complete the notification of physical/operational change reports.

^j We have assumed that each respondent will take 88 hours once per year to complete the LDAR program.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

Burden Item	A EPA Person hours per occurrence	B No. of occurrences per plant per year	C EPA person hours per plant per year (C=AxB)	D Plants per year ^a	E Technical person hours per year (C x D)	F Managerial person- hours per year (E x 0.05)	G Clerical person hours per year (E x 0.10)	H Total annual cost (\$) ^b
Review notification of construction/reconstruction	2	1	2	1	2	0.1	0.2	\$103.65
Review notification of physical/operational changes ^c	2	1	2	8	16	0.8	1.6	\$829.19
Review notification of actual startup	2	1	2	1	2	0.1	0.2	\$103.65
Review initial notification reports	8	1	8	1	8	0.4	0.8	\$414.60
Review notifications of compliance status ^d	10	1	10	1	10	0.5	1	\$518.25
Review semiannual summary reports ^e	2	1	2	160	320	16	32	\$16,583.84
Review notifications of performance tests	4	1	4	1	4	0.2	0.4	\$207.30
Review test results	10	1	10	1	10	0.5	1	\$518.25
Review startup, shutdown, malfunction report ^f	2	1	2	18	36	1.8	3.6	\$1,865.68
Subtotals Labor Burden and Cost					408	20.4	40.8	
TOTAL LABOR BURDEN AND COST (rounded)						469		\$21,144

Assumptions

^a We have assumed that the average number of respondents that will be subject to the rule will be 83 sources, with one additional source over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.27 (GS-13, Step 5, \$38.92 x 1.6), Technical rate of \$46.21 (GS-12, Step 1, \$28.88 x 1.6), and Clerical rate of \$25.01 (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) “2011 General Schedule” which excludes locality rates of pay.

^c We have assumed that eight respondents will each take 2 hours once per year to review physical/operational changes.

^d We have assumed that it will take ten hours once per year to review notification of compliance status.

^e We have assumed that it will take two hours once per year to review the semiannual summary report.

^f We have that it will take 2 hours once per year for each respondent to review the SSM report.

