

Polyvinyl Chloride and Copolymers (PVC) Production

Area Source NESHAP Burden Estimate

February 9, 2012

Worksheet Name	Description
PVC YR 1	NESHAP Burden Estimate for Industry in Year 1
PVC YR 2	NESHAP Burden Estimate for Industry in Year 2
PVC YR 3	NESHAP Burden Estimate for Industry in Year 3
PVC-Summary-PV	Summary of NESHAP Burden Estimate for Industry
Record&Reporting Burden Only	Calculation of Record Keeping and Reporting Burden for Industry
EPA YR 1	NESHAP Burden Estimate for EPA in Year 1
EPA YR 2	NESHAP Burden Estimate for EPA in Year 2
EPA YR 3	NESHAP Burden Estimate for EPA in Year 3
EPA Summary	Summary of NESHAP Burden Estimate for EPA
Hrs_Responses	Summary of Hours required by responses
Process Vent - T&M Costs	Process Vent Testing and Monitoring Costs
Resin T&M Costs	Stripped Resin Testing and Monitoring Costs
Wastewater T&M Costs	Wastewater Testing and Monitoring Costs
EquipmentLeaks - T&M Costs	Equipment Leaks - Testing and Monitoring Costs
Hourly Rates	Hourly Rate Calculations

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

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
	Respondent Hours per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x C)	Number of Respondents Per Year	Technical Hours Per Year (D x E)	Management Hours Per Year (F x 0.05)	Clerical Hours Per Year (H x 0.1)				
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	2	50	3	5	\$5,439	\$200	0	a,b,c
B. Required Activities												
1) Initial performance test, sampling, and report												
a) Process Vents	32	\$43,198	1	32	2	64	3	6	\$6,962	\$86,395	0	a,d
b) Resins	2	\$1,803	1	2	2	4	0	0	\$435	\$3,606	0	a,e
c) wastewater	2	\$491	1	2	4	8	0	1	\$870	\$1,964	0	a,f
d) heat exchangers		\$0	0	0	4	0	0	0	\$0	\$0	0	g
e) equipment leaks	2	\$177,360	1	2	2	4	0	0	\$435	\$354,720	0	h
2) Periodic performance test, sampling, and report												
a) Process Vents	32	\$43,198	1	32	0	0	0	0	\$0	\$0	0	i
b) Resins	1	\$601	11	11	2	22	1	2	\$2,393	\$13,222	0	e
c) wastewater	1	\$491	11	11	2	22	1	2	\$2,393	\$10,791	0	f
d) uncontrolled wastewater	1	\$491	1	1	0	0	0	0	\$0	\$0	0	f
e) heat exchangers	1	\$0	12	12	4	48	2	5	\$5,221	\$0	0	g
f) equipment leaks	1	\$16,105	1	1	2	2	0	0	\$218	\$32,210	0	h
3) Establish operating parameters and monitoring plan												
a) Process Vents	3.5	\$0	1	3.5	2	7	0	1	\$761	\$0	0	a,b,c
4) Continuous parameter monitoring												
a) Initial capital costs (PRD Electronic Monitor)	0	\$64,244	1	0	2	0	0	0	\$0	\$128,488	0	a,b
b) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$31,772	1	11	2	22	1	2	\$2,393	\$63,544	0	b
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	2	10	1	1	\$1,088	\$0	2	a,b
2) Batch precompliance report	5	\$0	1	5	2	10	1	1	\$1,088	\$0	2	a,b
3) Notification of performance test with test plan	10	\$0	1	10	2	20	1	2	\$2,175	\$0	2	a,b
4) Notification of compliance status	20	\$0	1	20	2	40	2	4	\$4,351	\$0	2	a,b
5) Compliance report	25	\$0	1	25	0	0	0	0	\$0	\$0	0	b,k
6) Notice of inspection	5	\$0	1	5	2	10	1	1	\$1,088	\$0	2	b,k
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	j
Reporting Subtotal						343	17	34	\$37,309	\$566,652	10	i
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	b,k
2) Records of resin stripper requirements	15	\$0	1	15	0	0	0	0	\$0	\$0	0	b,k
3) Records wastewater requirements	15	\$0	1	15	0	0	0	0	\$0	\$0	0	b,k
4) Records of storage vessel requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	b,k
5) Records of equipment leak requirements	25	\$0	1	25	0	0	0	0	\$0	\$0	0	b,k
6) Records of heat exchanger requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	b,k
7) Records of other emission sources requirements	10	\$0	1	10	0	0	0	0	\$0	\$0	0	b,k
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						0	0	0	\$0	\$0	0	
TOTAL:						343	17	34	\$37,309	\$566,652	10	
							Total Hours	Labor	Non-Labor	Total		
							394	\$37,309	\$566,652	\$603,962		
									\$128,688			
									\$566,652			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c 2 area sources in affected source category
- d 2 area sources are expected to perform testing for process vents.
- e 2 area sources expected to perform testing for resins
- f Estimated 1 uncontrolled stream and 1 wastewater stripper per facility. 1 wastewater stripper outlet is expected to require monthly testing; 1 uncontrolled stream will require annual testing (per facility).
- g All heat exchanger testing and monitoring costs assumed to be incurred annually. 4 heat exchangers at 2 area sources.
- h Non-Labor costs technically include labor to perform LDAR testing in addition to monitoring equipment and maintenance materials. Respondent hours are an estimation of the additional reporting required by the final rule.
- i process vent testing is an annual occurrence, therefore no additional costs are expected in addition to the initial testing requirement.
- j Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate
- k Annual cost. Annual costs are not incurred until the second year of operation.
- l Reporting subtotal does not include capital costs for PRD monitoring system.

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

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Non-Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Hours Per Respondent Per Year (C=A x C)	(E) Number of Respondents Per Year	(F) Technical Hours Per Year (D x E)	(G) Management Hours Per Year (F x 0.05)	(H) Clerical Hours Per Year (F x 0.1)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	0	0	0	0	\$0	\$0	0	a,b,c
B. Required Activities												
1) Initial performance test, sampling, and report												
a) Process Vents	32	\$43,198	1	32	0	0	0	0	\$0	\$0	0	a,d
b) Resins	2	\$1,803	1	2	0	0	0	0	\$0	\$0	0	a,e
c) wastewater	2	\$491	1	2	0	0	0	0	\$0	\$0	0	a,f
d) heat exchangers		\$0	0	0	0	0	0	0	\$0	\$0	0	g
e) equipment leaks	2	\$177,360	1	2	0	0	0	0	\$0	\$0	0	h
2) Periodic performance test, sampling, and report												
a) Process Vents	6.4	\$8,640	1	6.4	2	13	1	1	\$1,392	\$17,279	0	i
b) Resins	1	\$601	12	12	2	24	1	2	\$2,611	\$14,424	0	e
c) wastewater	1	\$491	12	12	2	24	1	2	\$2,611	\$11,772	0	f
d) uncontrolled wastewater	1	\$491	1	1	2	2	0	0	\$218	\$981	0	f
e) heat exchangers	1	\$0	12	12	4	48	2	5	\$5,221	\$0	0	g
f) equipment leaks	1	\$16,105	1	1	2	2	0	0	\$218	\$32,210	0	h
3) Establish operating parameters and monitoring plan												
a) Process Vents	3.5	\$0	1	3.5	0	0	0	0	\$0	\$0	0	a,b,c
4) Continuous parameter monitoring												
a) Initial capital costs (PRD Electronic Monitor)	0	\$64,244	1	0	0	0	0	0	\$0	\$0	0	a,b
b) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$31,772	1	11	2	22	1	2	\$2,393	\$63,544	0	b
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	0	0	0	0	\$0	\$0	0	a,b
2) Batch precompliance report	5	\$0	1	5	0	0	0	0	\$0	\$0	0	a,b
3) Notification of performance test with test plan	10	\$0	1	10	0	0	0	0	\$0	\$0	0	a,b
4) Notification of compliance status	20	\$0	1	20	0	0	0	0	\$0	\$0	0	a,b
5) Compliance report	25	\$0	1	25	2	50	3	5	\$5,439	\$0	2	b,k
6) Notice of inspection	5	\$0	1	5	2	10	1	1	\$1,088	\$0	2	b,k
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	j
Reporting Subtotal						195	10	19	\$21,189	\$140,210	4	i
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
2) Records of resin stripper requirements	15	\$0	1	15	2	30	2	3	\$3,263	\$0	0	b,k
3) Records wastewater requirements	15	\$0	1	15	2	30	2	3	\$3,263	\$0	0	b,k
4) Records of storage vessel requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
5) Records of equipment leak requirements	25	\$0	1	25	2	50	3	5	\$5,439	\$0	0	b,k
6) Records of heat exchanger requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
7) Records of other emission sources requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						190	9.5	19	\$20,667	\$0	0	
TOTAL:						385	19	38	\$41,856	\$140,210	4	
							Total Hours	Labor	Non-Labor	Total		
							443	\$41,856	\$140,210	\$182,066		
									\$0			
									\$140,210			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c 2 area sources in affected source category
- d 2 area sources are expected to perform testing for process vents.
- e 2 area sources expected to perform testing for resins
- f Estimated 1 uncontrolled stream and 1 wastewater stripper per facility. 1 wastewater stripper outlet is expected to require monthly testing; 1 uncontrolled stream will require annual testing (per facility).
- g All heat exchanger testing and monitoring costs assumed to be incurred annually. 4 heat exchangers at 2 area sources.
- h Non-Labor costs technically include labor to perform LDAR testing in addition to monitoring equipment and maintenance materials. Respondent hours are an estimation of the additional reporting required by the final rule.
- i process vent testing is an annual occurrence, therefore no additional costs are expected in addition to the initial testing requirement.
- j Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate
- k Annual cost. Annual costs are not incurred until the second year of operation.
- l Reporting subtotal does not include capital costs for PRD monitoring system.

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

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Non-Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Hours Per Respondent Per Year (C=A x C)	(E) Number of Respondents Per Year	(F) Technical Hours Per Year (D x E)	(G) Management Hours Per Year (F x 0.05)	(H) Clerical Hours Per Year (F x 0.1)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A											
2. Surveys and Studies	N/A											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	25	\$100	1	25	0	0	0	0	\$0	\$0	0	a,b,c
B. Required Activities												
1) Initial performance test, sampling, and report												
a) Process Vents	32	\$43,198	1	32	0	0	0	0	\$0	\$0	0	a,d
b) Resins	2	\$1,803	1	2	0	0	0	0	\$0	\$0	0	a,e
c) wastewater	2	\$491	1	2	0	0	0	0	\$0	\$0	0	a,f
d) heat exchangers		\$0	0	0	0	0	0	0	\$0	\$0	0	g
e) equipment leaks	2	\$177,360	1	2	0	0	0	0	\$0	\$0	0	h
2) Periodic performance test, sampling, and report												
a) Process Vents	6.4	\$8,640	1	6.4	2	13	1	1	\$1,392	\$17,279	0	i
b) Resins	1	\$601	12	12	2	24	1	2	\$2,611	\$14,424	0	e
c) wastewater	1	\$491	12	12	2	24	1	2	\$2,611	\$11,772	0	f
d) uncontrolled wastewater	1	\$491	1	1	2	2	0	0	\$218	\$981	0	f
e) heat exchangers	1	\$0	12	12	4	48	2	5	\$5,221	\$0	0	g
f) equipment leaks	1	\$16,105	1	1	2	2	0	0	\$218	\$32,210	0	h
3) Establish operating parameters and monitoring plan												
a) Process Vents	3.5	\$0	1	3.5	0	0	0	0	\$0	\$0	0	a,b,c
4) Continuous parameter monitoring												
a) Initial capital costs (PRD Electronic Monitor)	0	\$64,244	1	0	0	0	0	0	\$0	\$0	0	a,b
b) Annualized capital and O&M costs (PRD Electronic Monitor)	11	\$31,772	1	11	2	22	1	2	\$2,393	\$63,544	0	b
C. Create Information	Incl. in 3.B											
D. Gather Information	Incl. in 3.E											
E. Report Preparation												
1) Initial Notification	5	\$0	1	5	0	0	0	0	\$0	\$0	0	a,b
2) Batch precompliance report	5	\$0	1	5	0	0	0	0	\$0	\$0	0	a,b
3) Notification of performance test with test plan	10	\$0	1	10	0	0	0	0	\$0	\$0	0	a,b
4) Notification of compliance status	20	\$0	1	20	0	0	0	0	\$0	\$0	0	a,b
5) Compliance report	25	\$0	1	25	2	50	3	5	\$5,439	\$0	2	b,k
6) Notice of inspection	5	\$0	1	5	2	10	1	1	\$1,088	\$0	2	b,k
7) Affirmative defense	18	\$0	1	18	0	18	12	0	\$0	\$0	0	j
Reporting Subtotal						195	10	19	\$21,189	\$140,210	4	i
4. Recordkeeping Requirements												
A. Read Instructions	Incl. in 3.A											
B. Implement Activities	N/A											
C. Develop Record System	N/A											
D. Record Information												
1) Records of process vent requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
2) Records of resin stripper requirements	15	\$0	1	15	2	30	2	3	\$3,263	\$0	0	b,k
3) Records wastewater requirements	15	\$0	1	15	2	30	2	3	\$3,263	\$0	0	b,k
4) Records of storage vessel requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
5) Records of equipment leak requirements	25	\$0	1	25	2	50	3	5	\$5,439	\$0	0	b,k
6) Records of heat exchanger requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
7) Records of other emission sources requirements	10	\$0	1	10	2	20	1	2	\$2,175	\$0	0	b,k
E. Personnel Training	Incl. in 3.B											
F. Time for Audits	N/A											
Recordkeeping Subtotal						190	9.5	19	\$20,667	\$0	0	
TOTAL:						385	19	38	\$41,856	\$140,210	4	
							Total Hours	Labor	Non-Labor	Total		
							443	\$41,856	\$140,210	\$182,066		
									\$0			
									\$140,210			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c 2 area sources in affected source category
- d 2 area sources are expected to perform testing for process vents.
- e 2 area sources expected to perform testing for resins
- f Estimated 1 uncontrolled stream and 1 wastewater stripper per facility. 1 wastewater stripper outlet is expected to require monthly testing; 1 uncontrolled stream will require annual testing (per facility).
- g All heat exchanger testing and monitoring costs assumed to be incurred annually. 4 heat exchangers at 2 area sources.
- h Non-Labor costs technically include labor to perform LDAR testing in addition to monitoring equipment and maintenance materials. Respondent hours are an estimation of the additional reporting required by the final rule.
- i process vent testing is an annual occurrence, therefore no additional costs are expected in addition to the initial testing requirement.
- j Hours for affirmative defense are shown only for illustration and are not included in the total burden estimate
- k Annual cost. Annual costs are not incurred until the second year of operation.
- l Reporting subtotal does not include capital costs for PRD monitoring system.

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

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	343	17	34	394	\$37,309	\$566,652	\$603,962
2	385	19	38	443	\$41,856	\$140,210	\$182,066
3	385	19	38	443	\$41,856	\$140,210	\$182,066
Total	1,113	56	111	1,279	\$121,022	\$847,073	\$968,094
Average	371	19	37	426	\$40,341	\$282,358	\$322,698

Record Keeping and Reporting Burden by Emission Point

Note: This table is used to calculate the record keeping and reporting burden by emission point for the PVC NESHAP. The costs presented in the table below represent costs not otherwise included in the PVC NESHAP Impact estimate (i.e., testing and monitoring costs are already included in the PVC NESHAP impacts estimate, therefore, they are not included in the table below). The costs presented in the table below should be added to the previously calculated PVC Impacts to obtain an impacts estimate which includes record keeping and reporting.

Record Keeping and Reporting Burden By Emission Point					
Emission Point	Initial Cost (\$)	Initial Notes	Annual Cost (\$/yr)		
			Yr 1	Yr 2	Yr 3
Resins	\$2,639	a,b,d	\$2,393	\$6,806.13	\$6,806.13
Process Vents	\$9,927	a,b,c,d	\$0	\$4,500.12	\$4,500.12
Wastewater	\$3,074	a,b,d	\$2,393	\$7,023.67	\$7,023.67
Equipment Leaks	\$2,639	a,b,d	\$2,611	\$8,981.60	\$8,981.60
Storage Vessels	\$2,204	a,d	\$0	\$3,107.82	\$3,107.82
Heat Exchange Systems	\$2,204	a,b,d	\$5,221	\$8,328.96	\$8,328.96
Other Sources	\$2,204	a,d	\$0	\$3,107.82	\$3,107.82
Total	\$24,892		\$12,617.75	\$41,856.12	\$41,856.12

- a Labor/Non Labor Costs to "Read/Understand Rule Requirements" divided by 7 emission points
- b Initial Performance Test/Sampling/Report
- c Establishment of operating parameters and monitoring plan
- d Report preparation for item 3.E.1-6 divided by 7 emission points
- e Periodic sampling/testing/and monitoring (not applicable for process vents in year 1)
- f Years 2 and 3 include items 3.E.5 and 3.E.6 divided by 7 emission points
- g In year 2 and 3, recordkeeping items under 4.D are included
- h includes annual labor cost for PRD monitoring system

Annual Notes
e,f,g
e,f,g
e,f,g
e,f,g,h
e,f,g
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Table 5 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for Existing Area Sources: Polyvinyl Chloride and Copolymer Manufacturing Units - Year 1

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	10		16	160	8	16	\$8,292
3. Required Activities							
A. Observe initial performance tests	0	b	48	19	1	2	\$995
B. Excess emissions -- Enforcement Activities	0	d	24	0	0	0	\$0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	2		3	6	0	1	\$311
2) Review batch precompliance report	2		5	10	1	1	\$518
3) Review notification of performance test	2		10	20	1	2	\$1,036
4) Review notification of compliance status	2		40	80	4	8	\$4,146
5) Review compliance report	0		20	0	0	0	\$0
6) Review notice of inspection	2		3	6	0	1	\$311
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	8	8	0	1	\$415
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					\$881	per trip	\$353
TOTAL				309	15	31	\$16,376

FOOTNOTES

- a Figures may not add exactly due to rounding.
- b Assumes EPA personnel attend 20 percent of the initial process vent stack tests.
- c Using four hours per state to write annual summary report.
- d Assume no emissions exceedances

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

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0		16	0	0	0	\$0
3. Required Activities							
A. Observe initial performance tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	0	d	24	0	0	0	\$0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	0		3	0	0	0	\$0
2) Review batch precompliance report	0		5	0	0	0	\$0
3) Review notification of performance test	0		10	0	0	0	\$0
4) Review notification of compliance status	0		40	0	0	0	\$0
5) Review compliance report	2		20	40	2	4	\$2,073
6) Review notice of inspection	2		3	6	0	1	\$311
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	8	8	0	1	\$415
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					n/a	per trip	\$0
TOTAL				54	3	5	\$2,798

FOOTNOTES

a Figures may not add exactly due to rounding.

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

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

d Assume no emissions exceedances

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

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0		16	0	0	0	\$0
3. Required Activities							
A. Observe initial performance tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	0	d	24	0	0	0	\$0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial notification	0		3	0	0	0	\$0
2) Review batch precompliance report	0		5	0	0	0	\$0
3) Review notification of performance test	0		10	0	0	0	\$0
4) Review notification of compliance status	0		40	0	0	0	\$0
5) Review compliance report	2		20	40	2	4	\$2,073
6) Review notice of inspection	2		3	6	0	1	\$311
7) Review affirmative defense	0		10	0	0	0	\$0
F. Prepare annual summary report	1	c	8	8	0	1	\$415
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					n/a	per trip	\$0
TOTAL				54	3	5	\$2,798

FOOTNOTES

a Figures may not add exactly due to rounding.

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

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

d Assume no emissions exceedances

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

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	309	15	31	356	\$16,376	\$0	\$16,376
2	54	3	5	62	\$2,798	\$0	\$2,798
3	54	3	5	62	\$2,798	\$0	\$2,798
Total	417	21	42	480	\$21,973	\$0	\$21,973
Average	139	7	14	160	\$7,324	\$0	\$7,324

Response Hours Analysis

	Reporting		
	Hours	# of Respondents	# of Responses
Year 1	394	2	10
Year 2	224	2	4
Year 3	224	2	4
Total	842	6	18
Average Annual	281	2	6

Total hours	1,279
Hours per year	426
# of responses per respondent (annual)	3
Hours per response (annual)	71
Reporting hours per response (annual)	46.8050
Recorkeeping hours per response (annual)	24.2778

Cost per response (non-labor)	47,059.59
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Recordkeeping
Hours
-
219
219
437
146

2. Required activities	Hours per Occurrence	Occurrence per Year	Total Hours Per Year
a. Perf. spec. tests (certif.) for CMS	11	1	11

Notes:

2. Person-hours per occurrence for CMS performance specification costs are based on the performance specification costs to certify CMS (\$700) divided by the composite hourly labor rate (\$66.41/hr).

Sources:

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