

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD)
(Renewal), EPA ICR Number 1717.09, OMB Control Number 2060-0313

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations were: proposed on October 13, 1994; promulgated on July 1, 1996; and last amended on June 23, 2003. These regulations apply to existing facilities and new facilities with organic hazardous air pollutant (HAP) emissions that are involved in waste management and recovery operations, and that are not subject to Federal air standards under other subparts in part 63. In addition, subpart DD cross-references control requirements to be applied to specific types of affected sources: tankslevel-1; containers; surface impoundments; individual drain systems; oil-water separators; organic water separators; and loading, transfer, and storage systems. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart DD.

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.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 236 respondents per year will be subject to the standards, and no additional respondents per year will become subject to the standards.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal). The Federal Government “burden” is attributed entirely to work performed by either Federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 off-site waste and recovery operations 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 DD.

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 standards are used to inform either the Agency or its 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 DD.

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, duplication does not exist.

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 (78 FR 33409) on June 4, 2013. 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 EPA's 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 and the standard has been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Solid Waste Association of North America (SWANA), at (800) 467-9262; and 2) Safety-Kleen, at (800) 323-5040.

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 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 off-site waste and recovery operations that store, treat, recycle, reprocess, or dispose of wastes containing organic chemical compounds. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 63, Subpart DD)	SIC Codes	NAICS Codes
Petrochemical Manufacturing	2869	325110
All Other Basic Inorganic Chemical Manufacturing	2869	325188
Cyclic Crude and Intermediate Manufacturing	2689	325192
Ethyl Alcohol Manufacturing	2689	325193
All Other Basic Organic Chemical Manufacturing	2689	325199
Industrial Gas Manufacturing	2689	325120
All Other Miscellaneous Chemical Product and Preparation Manufacturing	2689	325998
Plastic Materials and Resin Manufacturing	2821	325211
Explosives Manufacturing	2892	325920
Carbon Black Manufacturing	2816	325182
Inorganic Dye and Pigment Manufacturing	2816	325131
Semiconductor and Related Device Manufacturing	3674	334413
Petroleum Refineries	2911	324110
Aircraft Manufacturing	3721	336411
Aircraft (research and development not producing prototypes)	3721	541710
Other General Government Support	9199	921190
All Other Petroleum and Coal Products Manufacturing	3312	324199
Iron and Steel Mills	3312	331111
Rolled Steel Shape Manufacturing	3312	331221

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD).

A source must make the following reports:

Notifications	
Notification and application of construction/reconstruction	63.5(d)
Notification of initial startup	63.9(b)
Notification of initial performance test	63.7(b) , 63.9(e)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical and operational change	63.10
Notification of performance tests	63.7(b), 63.697(b)(1)
Performance test results	63.8(e)(5), 63.697(b)(2)
Startup, shutdown, malfunction reports	63.697(b)(3)
Notification of tank floating roof inspection	63.686(b)(3)
Notification of oil/water separator floating roof inspection	63.687(d)(6)
Notification to tank refill	63.697(d)(1)
Notification of seal gap measurements	63.697(d)(2)

Reports	
Initial performance test results	63.10(d)(2)
Opacity or visible emissions	63.10(d)(3)
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(i)
Source status report	63.10(e)(3)
Excess emission reports	63.695(e)
Semiannual summary report	63.697(b)(4)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative.	63.10(b)(2)
All reports and notifications.	63.10(b)
Record of applicability.	63.10(b)(3)
Records of sources with continuous monitoring systems.	63.10(c)
Records of startup, shutdown, and malfunctions, and pollution control system maintenance.	63.696(b)(1)
Records of applicability determinations.	63.696(b)(3)
Documentation of extension of tank emptying schedule.	63.696(c)
Records of results of seal gap measurements and description of repairs.	63.686(d)(3)
Record of sampling plan for determining volatile organic hazardous air pollutant (VOHAP) concentration at point of treatment	63.694(c)
Record of sampling plan for determining maximum HAP vapor pressure in tanks.	63.694(j)(2)(1)
Record of maximum HAP vapor pressure determinations for covered tanks	63.686(c)(5)
Records should be retained for 5 years.	63.10(b)(1)

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 33 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid

Respondent Activities
supply pressure for 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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide 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
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, and note the operating conditions under which compliance was achieved. 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/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). According to the *Off-Site Waste and Recovery Operations NESHAP: Economic Impact Analysis*, (EPA-452/R-96-011, June 1996), EPA specifically identified 388 firms that own 621 potentially affected facilities. These 388 firms include 110 small businesses that own 112 facilities; therefore, this ICR assumes that approximately 18 percent of the total facilities (42 of 236 respondents) are small businesses.

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 below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 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 178,527 hours (see Total Labor Hours from Table 1 below). 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	\$122.49 (\$58.33+ 110%)
Technical	\$101.28 (\$48.23 + 110%)
Clerical	\$50.80 (\$24.19 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2012, "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. There are no capital/startup costs for this ICR since no new sources are projected over the next three years. The annual operation and maintenance costs are the ongoing costs of photocopying and postage. There is no significant operation and maintenance costs since sources are not required to install continuous monitoring systems.

(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 ¹	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
N/A	\$0	0	\$0	\$22.71	256	\$5,813.76

¹ We assume photocopying and postage cost of \$7.57 per response and 3 responses per respondent, for a total of \$22.71 per respondent.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$5,814 (rounded). 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 \$5,814. These are the costs of recordkeeping.

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 \$122,306.

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), 2012 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 Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 236 existing respondents will be subject to the standards. 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 236 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 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	236	0	0	236
2	0	236	0	0	236
3	0	236	0	0	236
Average	0	236	0	0	236

¹ New respondent 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 236.

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
Startup/Shutdown Report	236	1	0	236
Semiannual Report	236	2	0	472
			Total	708

The number of Total Annual Responses is 708.

The total annual labor costs are \$17,462,184. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 178,527 hours at a cost of \$17,462,184. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 252 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$5,814. 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 2,714 labor hours at a cost of \$122,306. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal).

6(f) Reasons for Change in Burden

The increase in burden from the most recently approved ICR is due to a mathematical correction in labor hours and an increase in labor costs. This ICR uses rounded estimates of per-respondent technical hours to calculate both industry and agency burden. In addition, this ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 252 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-2013-0336. 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-2013-0336 and OMB Control Number 2060-0313 in any correspondence.

Part B of the Supporting Statement

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

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person hours per year (E=C x D) ^b	(F) Managerial person hours per year (E x 0.05)	(G) Clerical Person hours per year (E x 0.1)	(H) Total Costs per year \$ (a)
a. Determination								
Commercial Facilities ^h	2	260	520	118	61,360	3,068	6,136	\$6,902,048.92
Other Facilities ⁱ	2	12	24	118	2,832	141.6	283.2	\$318,556.10
b. Vapor Pressure Determination								
Commercial Facilities ^h	1	260	260	118	30,680	1,534	3,068	\$3,451,024.46
Other Facilities ⁱ	1	12	12	118	1,416	70.8	141.6	\$159,278.05
c. Control Equipment Leak Monitoring								
Large Cover	0.25	10	2.5	236	590	29.5	59	\$66,365.86
Small Cover	0.05	1000	50	236	11,800	590	1,180	\$1,327,317.10
Closed Vent System	0.5	5	2.5	236	590	29.5	59	\$66,365.86
d. Control Equipment Leak Monitoring								
Cover Vented to Control Device	1	5	5	236	1,180	59	118	\$132,731.71
Closed Vent System	1	5	5	236	1,180	59	118	\$132,731.71
e. Control Devices								
Performance Determination ^c	40	1	40	0	0	0	0	\$0
Continuous Monitoring System	8	5	40	236	9,440	472	944	\$1,061,853.68
f. LDAR Program								
Identify Affected Waste Streams ^c	40	1	40	0	0	0	0	\$0
Perform Monitoring/Repair ^j	80	1	80	47.2	3,776	188.8	377.6	\$424,741.47
D. Develop Record System ^c								
Control Equipment	16	1	16	0	0	0	0	\$0

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person hours per year (E=C x D) ^b	(F) Managerial person hours per year (E x 0.05)	(G) Clerical Person hours per year (E x 0.1)	(H) Total Costs per year \$ (a)
LDAR Program	40	1	40	0	0	0	0	\$0
E. Time to Enter Information								
Cover Designs	40	1	40	0	0	0	0	\$0
Control Device Design ^c	40	1	40	0	0	0	0	\$0
Control Equipment Testing ^c	1	1	1	0	0	0	0	\$0
Control Equipment Inspections ^c	1	1	1	236	236	11.8	23.6	\$26,546.34
Control Equipment Monitoring	1	1	1	236	236	11.8	23.6	\$26,546.34
Control Device CMS	1	52	52	236	12,272	613.6	1,227.2	\$1,380,409.78
LDAR Program ^j	4	16	64	47.2	3,020.8	151.04	302.08	\$339,793.18
Off-site Material Determinations	1	52	52	236	12,272	613.6	1,227.2	\$1,380,409.78
F. Time to Train Personnel ^c								
Waste Determination Methods	40	1	40	0	0	0	0	\$0
Monitoring	40	1	40	0	0	0	0	\$0
LDAR Program	40	1	40	0	0	0	0	\$0
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						175,812.92		\$17,196,720.34
TOTAL ANNUAL BURDEN AND COST (rounded)						178,527		\$17,462,184

Assumptions:

^a This ICR uses the following labor rates: Managerial \$122.49 ; Technical \$101.28; and Clerical \$50.80. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2012, "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.

^b We have assumed that there are approximately 236 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person hours per year (E=C x D)^b	(F) Managerial person hours per year (E x 0.05)	(G) Clerical Person hours per year (E x 0.1)	(H) Total Costs per year \$ (a)
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three years.

^c This activity is performed once during the year following promulgation of the rule.

^d It is assumed that it will take 4 hours to read instructions.

^e It is assumed that it will take 8 hours to gather existing information.

^f It is assumed that there will be no new sources.

^g The burden of one annual summary report was included in the burden estimate for the semiannual report.

^h It is assumed that 50 percent of the facilities, the owner or operator manages, for a fee, off-site materials received from other generators.

ⁱ It is assumed that 50 percent of the owners or operators accept the off-site material at another location and ship it to the facility for storage, treatment, or disposal.

^j It is assumed that 20 percent of the facilities will perform monitoring/repair (for LDAR program).

Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/ Year	(C) EPA Hours/ Year (AxB)	(D) Plants/ Year ^b	(E) Technica l Hours/ Year (C x D)	(F) Managerial Hours/ Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.1)	(H) Costs, \$ ^a
Report Review								
New Plants ^{c, d}								
Initial notification	2	1	2	0	0	0	0	\$0
Performance test notification	1	1	1	0	0	0	0	\$0
Compliance status notification	4	1	4	0	0	0	0	\$0
Performance test report ^e	16	1	16	0	0	0	0	\$0
Existing Plants								
Startup/shutdown report ^f	2	1	2	236	472	23.6	47.2	\$24,461.16
Semiannual summary report ^g	4	2	8	236	1,888	94.4	188.8	\$97,844.66
TOTAL ANNUAL BURDEN AND COST (rounded)					2,714			\$122,306

Assumptions:

(a) This ICR uses the following labor rates: Managerial \$62.27; Technical \$46.21; and Clerical \$25.01. These rates are from the Office of Personnel Management (OPM), 2012 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.

^b We have assumed that there are approximately 236 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years

^c There will be no travel expenses associated with this ICR since we have assumed that no new sources will become subject to this rule over the three year period of this

ICR.

^d It is assumed that there will be no new sources over the three year period of this ICR.

^e It is assumed that it will take 16 hours to review each performance test report.

^f It is assumed that it will take 2 hours once per year for each plant to review report.

^g It is assumed that each facility will take 4 hours twice a year to submit report.