

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)  
(Renewal), EPA ICR Number 1869.07, OMB Control Number 2060-0434

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Amino/Phenolic Resins were: proposed on December 14, 1998; promulgated on January 20, 2000; and last amended on April 20, 2006. These regulations apply to both existing facilities and new facilities that engage in the manufacture of amino/phenolic resins. New facilities include those that either commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart OOO.

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 facility 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 37 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal). The burden to 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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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, hazardous air pollutant (HAP) emissions from facilities that manufacture of amino/phenolic resins 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 OOO.

### **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 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, 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 000.

#### **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 standards as it was being developed and the standards has previously been reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Technical Association of Pulp & Paper Industry (TAPPI), at (800) 332-8686; and 2) the American Foam Technologies,

Incorporated, at (304) 497-3000.

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

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

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

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

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with 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 owners and operators of amino/phenolic resins manufacturing operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2821 which corresponds to the North American Industry Classification System (NAICS) 325211 for Plastics Material and Resin Manufacturing.

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO).

A source must make the following reports:

<b>Notifications/Reports</b>	
Notification of intent to construct or reconstruct	63.05, 63.1417(d)
Notification and report of construction date	63.05, 63.1400(j)
Notification of anticipated startup	63.05, 63.1400(j)
Actual startup notification	63.05, 63.1400(j)
Notification of modification	63.05, 63.1400(j)
Notification and report of performance tests and results	63.07 (b), 63.1417(e)
Pre-compliance report	63.1417(d)
Notification and report of compliance status	63.1417(e)
Periodic reports (semiannual) including statement of compliance (if no exceedances occurred), daily, hatch cycle, and block average monitoring data for any periods where exceedances or excursions occur, periods of monitoring system downtime.	63.1417(f)
Quarterly reports upon request of the Administrator	63.1416(f)(2)
Develop startup, shutdown, malfunction plan	63.6(e)(3), 63.10(d)(5), 63.1417(g)
Notification of storage vessel inspection	63.1417(h)(1)
Site-specific test plan	63.1417(h)(2)
Notification of planned performance test	63.1417(h)(3)

<b>Notifications/Reports</b>	
Notification of change in primary product	63.1417(h)(4), 63.1400(g)(7-8)
Notification of added emission points	63.1417(h)(5)
Notification that a small control device has been re-designated as a large control device.	63.1417(h)(6)
Notification of process change	63.1417(h)(7)

A source must keep the following records:

<b>Recordkeeping</b>	
Five-year retention of records	63.1416(a)
Records of monitored values, maintenance, startup, shutdown, malfunction	63.1416(b), 63.6
Monitoring records	63.1416(c)
Batch process vent records	63.1416(d)
Aggregate batch vent stream records	63.1416(e)
Continuous process vent records	63.1416(f)
Other records or documentation	63.1416(g)
Reduced recordkeeping program	63.1416(h)

### 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 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.

<b>Respondent Activities</b>
Install, calibrate, maintain, and operate compliance monitoring system (CMS) for pH, flow, temperature, or specific gravity, or organic monitoring device for control options as applicable.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 308, 316, or 320 tests, 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.

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

<b>Agency Activities</b>
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Input, analyze, and maintain data in the Online Tracking Information System (OTIS).
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### **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. Both 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 Final Rule (65 FR 3276):

We have determined that, of the twenty affected firms, only six are small businesses . . . . Although this final rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has tried to reduce the impact of this rule on small entities. In order to minimize the impact of the rule for leaking equipment, we have exempted firms producing less than 881 tpy (800 Mg/yr) from complying with the requirements to have a leak detection and repair program.

Therefore, this ICR estimates approximately 30 percent of respondents, or 11 of the 37 respondents, may be small entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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. Where 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 22,370 hours (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	\$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. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
pH Monitor	\$1,000	0	\$0	\$300	37	\$11,100
Liquid Flow Monitor	\$500	0	\$0	\$100	37	\$3,700
<b>Total</b>			<b>\$0</b>			<b>\$14,800</b>

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 \$14,800. 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 \$14,800. 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 \$15,819.

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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 37 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 37 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	37	0	0	37
2	0	37	0	0	37
3	0	37	0	0	37
Average	0	37	0	0	37

<sup>1</sup> 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 37.

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

<b>Total Annual Responses</b>				
(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
Initial notification and performance tests	0	5	0	0
Repeat performance test <sup>a</sup>	37	0.05	0	1.85
Semiannual compliance reports	37	2	0	74
			<b>Total</b>	<b>75.85</b>

<sup>a</sup> We assume that 5 percent of the initial tests will be repeated during each successive year.

The number of Total Annual Responses is 76 (rounded).

The total annual labor costs are \$2,188,093. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 22,370 at a cost of \$2,188,093. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 294 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$14,800. 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 351 labor hours at a cost of \$15,819. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

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

There is an overall decrease in both burden and cost for the respondent and Agency. This is not due to any program changes. The burden decreased since the last ICR renewal due to a revision in the number of respondents. Based on recent industry data and Agency estimates, we have revised the number of affected sources from 40 to 37. This revision also resulted in a corresponding decrease in the total O&M costs.

In addition, this ICR corrects the Agency burden associated with the review of repeat performance tests. This ICR assumes that only 5 percent of respondents will conduct these tests.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 294 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-2013-0338. 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-2013-0338 and OMB Control Number 2060-0434 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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)**

<b>Burden Item</b>	<b>(A) Respondent Hours Per Occurrence</b>	<b>(B) Number of Occurrences per Respondent per year</b>	<b>(C) Hours per Respondent Per Year (AxB)</b>	<b>(D) Number of Respondents per Year<sup>c</sup></b>	<b>(E) Technical Hours Per Year (Cx D)</b>	<b>(F) Managerial Hours Per Year (E x 0.05)<sup>b</sup></b>	<b>(G) Clerical Hours per Year (E x 0.1)<sup>b</sup></b>	<b>(H) Total Cost Per Year<sup>a</sup></b>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
Read instructions <sup>d</sup>	16	1	16	37	592	29.6	59.2	\$66,590.82
Plan activities	8	1	8	37	296	14.8	29.6	\$33,295.41
Training	16	1	16	37	592	29.6	59.2	\$66,590.82
Create, test and research development <sup>e, f</sup>	320	1	320	1.85	592	29.6	59.2	\$66,590.82
Gather, monitor and inspect information	208	1	208	37	7,696	384.8	769.6	\$865,680.71
Process, compile and review	48	2	96	37	3,552	177.6	355.2	\$399,544.94
Complete reports <sup>g</sup>	40	2	80	37	2,960	148	296	\$332,954.12
Record/disclose information	16	2	32	37	1,184	59.2	118.4	\$133,181.65
Store, file, maintain information <sup>h</sup>	4	2	8	37	296	14.8	29.6	\$33,295.41
Leak detection and repair (LDAR) reporting <sup>i</sup>	60	1	60	25	1,500	75	150	\$168,726.75
<b>Subtotal for Reporting Requirements</b>					<b>22,149</b>			<b>\$2,166,451.45</b>
4. Recordkeeping Requirements								
Leak detection and repair (LDAR) recordkeeping <sup>i</sup>	104	1	104	1.85	192.4	9.62	19.24	\$21,642.02
<b>Subtotal for Recordkeeping Requirements</b>					<b>221.26</b>			<b>\$21,642.02</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>					<b>22,370</b>			<b>\$2,188,093</b>

**Assumptions**

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- 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- c. We have assume that there are 37 affected sources with no new, modified or reconstructed facility expected to be constructed over the next three years.
- d. We assume that it will take 16 hours for each respondent to read instructions.
- e. Initial performance testing was assumed to take 280 technical hours (1 test leader for two weeks and 5 feet crew for one week), with an additional 40 hours for the establishment of parameter monitoring levels for a total of 320 respondent hours per occurrence.
- f. We assume that 5 percent of the initial tests will be repeated during each successive year.
- g. We assume that it will take each respondent 40 hours two times per year to complete reports (semiannual reporting).
- h. We assume that it will take 4 hours two times per year to gather monitoring information and maintain monitoring equipment.
- i. We assume that there are 27 affected sources that will be required to comply with the equipment leaks LDAR program; 25 have less than 500 components and 2 have more than 500 components. The typical affected source has four reactor batch process vents, three non-reactor batch process vents, and no affected storage vessels or heat exchange systems.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)**

Activity	(A) EPA Hours Occurrence	(B) Occurrences Plant/ Year	(C) EPA Hours/Yea r (AxB)	(D) Plants/ Year	(E) Technical Hours/Year (E=C x D) <sup>b</sup>	(F) Managerial Hours/Year (E x 0.05) <sup>b</sup>	(G) Clerical Hours/Year (E x 0.1) <sup>b</sup>	(H) Costs, \$ (a)
Initial performance test	N/A							
Repeat performance test <sup>d, c</sup>	0.5	2	1	1.85	1.85	0.09	0.19	\$95.88
Report review								
a) Notification of construction/reconstruction	N/A							
b) Notification of anticipated startup	N/A							
c) Notification of actual startup	N/A							
d) Notification of modification	N/A							
e) Notification of compliance status	N/A							
f) Notification of performance test <sup>e, g</sup>	2	2	4	1.85	7.4	0.37	0.74	\$383.50
g) Notification of process change	N/A							
h) Notification of inspection of storage vessel	N/A							
i) Notification of change in primary product	N/A							
j) Pre-compliance report	N/A							
k) Storage vessel initial compliance demonstration	N/A							
l) Periodic reports of compliance status <sup>f, c</sup>	4	2	8	37	296	14.8	29.6	\$15,340.05
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>351</b>		<b>\$15,819</b>

**Assumptions:**

<sup>a</sup> We assumed a technical labor rate of \$46.21, managerial rate \$62.27, and clerical rate of \$25.01 from the United States Department of Labor. 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. These rates can be obtained from the OPM web site, <http://www.opm.gov/oca/payrates/index/htm>.

<sup>b</sup> This ICR assumes that Managerial hours are 5 percent of technical hours, and Clerical hours are 10 percent of Technical hours.

<sup>c</sup> We assume that there are 37 affected sources with no new, modified or reconstruction facility expected to be constructed over the next three years of this ICR.

<sup>d</sup> We assume that it would take 0.5 hours two times per year for respondent to complete repeat performance test.

<sup>e</sup> We assume that it will take two hours two times per year for respondent to review the notification of performance test report.

<sup>f</sup> We assume that it will take 4 hours 80 times per year for respondent to review the periodic report of compliance status.

<sup>g</sup> We assume that there are 27 affected sources that will be required to comply with the equipment leaks LDAR program; 25 have less than 500 components and two have more than 500 components.