

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal), EPA ICR Number 2256.04, OMB Control Number 2060-0598.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for: Acrylic and Modacrylic Fibers Production; Carbon Black Production; Chemical Manufacturing: Chromium Compounds; Flexible Polyurethane Foam Production and Fabrication; Lead Acid Battery Manufacturing; and Wood Preserving were all: proposed on April 4, 2007, promulgated on June 16, 2007, and amended on March 26, 2008. These various regulations apply to six different types of potential respondents.

The first type of potential respondents are either owners or operators of any existing or new acrylic or modacrylic fibers production plant that is an area source of hazardous air pollutants (HAP) emissions. The one existing area source is already subject to emissions limits and other requirements that are the same as those in this final NESHAP. These include: numerical limits for acrylonitrile emissions from the control devices (packed column scrubbers) for polymerization process equipment (e.g., reactors, feed tanks) and monomer recovery process equipment such as polymer holding tanks; operating limits for the scrubbers; and requirements in 40 CFR Part 60, Subpart Kb pertaining to volatile organic liquids in acrylonitrile storage tanks. The final standards for new area source acrylic or modacrylic fibers production plants apply to process vents, fiber spinning lines, storage tanks, process and maintenance wastewater, and equipment leaks. These include numerical limits for acrylonitrile emissions from these sources and various testing, monitoring, and recordkeeping requirements. Compliance requirements for all sources include an initial notification of applicability, a notification of compliance status, and a startup shutdown malfunction (SSM) plan.

The second type of potential respondents covers owners or operators of any existing or new carbon black production plant that is an area source of HAP emissions. There are no existing area sources. The final rule for existing sources includes requirements to reduce emissions from carbon black production units by using either a flare or by venting through a

closed vent system to a control device that reduces emissions by 98 weight-percent or to a HAP concentration of 20 Parts per million by volume (ppmv). Area sources are also required to monitor operating parameters specific to the type of control device being used. The requirements for new area source carbon black production plants are the same as those for existing plants. Compliance requirements include an initial notification, a notification of compliance status, periodic reports, and an SSM plan.

The third type of potential respondents involves owners or operators of area source facilities that use chromite ore as the basic feedstock to manufacture chromium compounds, primarily sodium dichromate, chromic acid, and chromic oxide. There are only two plants in this area source category, and both are already subject to particulate matter (PM) control requirements that are the same as those in the final NESHAP. Sources will be subject to PM emissions limits and inspection and maintenance requirements specific to the type of control device. Compliance requirements include an initial notification of applicability, a notification of compliance status, and an SSM plan.

The fourth type of potential respondents covers owners or operators of area source facilities that manufacture or fabricate flexible polyurethane foam. There are hundreds of plants in this area source category, but almost all of them have already discontinued use of the urban HAP of interest, methylene chloride. Use of materials containing methylene chloride is forbidden for mixhead flush; mold release agents; and equipment cleaning at slabstock, molded; and rebond foam production facilities. Foam fabrication facilities are forbidden to use adhesives containing methylene chloride. Compliance requirements for molded and rebond foam facilities, and foam fabrication facilities not operating loop slitters include only recordkeeping requirements. Compliance requirements for foam fabrication facilities operating loop slitters include a notification of compliance status. Emissions limits are established for HAP emissions from auxiliary blowing agents (ABA) used in production lines at slabstock foam production facilities, using a formula which takes into account the variable amount of ABA used to produce different grades of foam. Compliance requirements for slabstock foam facilities using no methylene chloride include a notification of compliance status. Compliance requirements for slabstock foam production facilities using HAP-containing ABA include an initial notification, a pre-compliance report, a notification of compliance status, semiannual reports, and an annual compliance certification. There are 500 respondents in this area source category.

The fifth type of potential respondents involves owners or operators of any existing or new lead acid battery manufacturing facility that is an area source of HAP emissions. The 60 existing facilities are already subject to or able to meet the emission limits and other requirements of the new source performance standards (NSPS) for lead acid batteries in 40 CFR 60.372 of Subpart KK. The lead acid battery NSPS emission limits are the same as those in this NESHAP. These include numerical emissions limits for grid casting, paste mixing, three-process operation, lead oxide manufacturing, lead reclamation, and other lead emitting processes. This final NESHAP requires control by fabric filters for the paste mixing, three-process operation, lead oxide manufacturing, and other lead-emitting processes and by impingement scrubber for the grid casting and lead reclamation processes. The NESHAP adds the periodic monitoring and semi-annual inspection of fabric filters and the semi-annual reporting

requirements found in state permits. The requirements for new area source lead acid battery manufacturing facilities are the same as those for the existing facilities. Compliance requirements include an initial notification, a notification of compliance status, performance testing if recent test reports are not available, periodic monitoring, semi-annual inspection of fabric filters, and semi-annual reporting.

The sixth type of potential respondents involves owners or operators of area source facilities that use either pressure or thermal processes to impregnate chemicals into wood to a depth that will provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. Existing facilities in the wood preserving source category are currently well controlled in terms of urban metal HAP emissions as a result of a voluntary decision by the industry to discontinue the consumer uses of chromated copper arsenate (CCA). All sources will be required to submit an initial notification, a notification of compliance status, and a compliance report within 30 days of a deviation from any of these prohibitions. No other recordkeeping or reporting requirements in the General Provisions apply to facilities in this area source category. Currently, there are 393 respondents in this area source category.

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, subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

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 956 sources per year will be subject to these standards, and no additional respondents per year will become subject to these standards. This estimate includes the combined respondents from all six source categories described above.

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

All of the acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities in the United States are owned and operated by the acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving industry (the “Affected Public”). None of the facilities in the United States are owned by either state, or local, or tribal or the Federal government. They are all privately-owned, for-profit businesses. The “burden” to the “Affected Public” may be found below in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal). The “burden” to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (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 acrylic and modacrylic fibers

production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving 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, subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards 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 the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standards are being met. The performance test may also be observed.

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

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

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 these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Polyurethane Foam Association (PFA), at (865) 690-4648; 2) the Flex-Foam Incorporated, at (602) 252-5819; 3) the Axion Power Battery, at (724) 654-9300; and 4) the Treated Wood Council, at (202) 463-2045.

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 these standards. EPA believes that the five-year records retention requirement is consistent with

Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities. 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.

40 CFR, Part 63, Subparts, LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ	SIC Codes	NAICS Codes
Acrylic or Modacrylic Fibers and Filaments Manufacturing	2824	325222
Carbon Black Manufacturing	2816, 2895	325182
Chromium Compounds	2819, 2869	325188
Urethane and Other foam Products (except Polystyrene) Manufacturing	3086	32615
Lead Acid Storage Batteries Manufacturing	3691	335911
Wood Preservation	2491	321114

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ).

A source must make the following reports and records:

Acrylic and Modacrylic Fibers Production

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notification	63.9(g)
Notification of compliance status	63.11397(b), 63.11397(c), 63.9(h)
Notification of change in information	63.9(j)

Reports	
Monthly summary of monitoring data	63.11395(f), 63.11396(f)
Report of deviation	63.11395(g)
Quality assurance test plan	63.7(c)
CMS performance evaluations/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions report	63.10(e)(3)

Recordkeeping	
Information to demonstrate compliance	63.11395(g), 63,11396(f), 63.10(a)
Startup, shutdown, and malfunction	63.10(b)(2)
Continuous parameter monitoring systems	61.10(c)(1), (c)(5)-(c)(14)
Records should be retained for 5 years	63.11395(g), 63.10(b)(1)

Carbon Black Production

Notifications	
Initial notification	63.11402, 63.1110(c)(2)
Notification of construction/reconstruction	63.5(d), 63.11402, 63.1110(a)(6)
Notification of initial startup	63.11402, 63.1110(b)
Notification of performance test	63.11402, 63.1110(a), 63.999(a)
SSM plan	63.11402, 63.1111(a)
Notification of compliance status	63.11402, 63.1110(d)

Reports	
Initial/repeat performance tests	63.11402, 63.999(a)
SSM reports	63.11402, 63.1112(b)

Recordkeeping	
Monitoring information	63.11402, 63.1109, 63.998, 63.11
All other control devices	63.11402, 63.996
Records should be retained for 5 years	63.11395(g), 63.10(b)(1)

Chemical Manufacturing: Chromium Compounds

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of performance test	63.11410(i), 63.9(c)
Notification of compliance status	63.9(h)

Reports	
Semiannual monitoring report	63.11410(e), 63.999(a)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)

Recordkeeping	
Monthly control device inspections	63.11410(d), 63.11410(h), 63.10

Flexible Polyurethane Foam Production and Fabrication

Notifications	
Notification of applicability	63.9(a)(2)
Notification of compliance status	63.9(h)

Reports	
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
SSM reports	63.6(e)(3)
CMS performance evaluation/report	63..8(e)(5)
Excess emissions reports	63.10(e)(3)

Recordkeeping	
Information used to demonstrate compliance	63.11416(f), 63.10

Lead Acid Battery Manufacturing

Notifications	
Notification of applicability	63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.11417, 63.9(h)
Notification of changes of information	63.9(j)

Reports	
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63..8(e)(5)
Excess emissions reports	63.10(e)(3)

Recordkeeping	
Information used to demonstrate compliance	63.11423(b), 63.10

Wood Preserving

Notifications	
Notification of applicability	63.11430, 63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.11430, 63.9(h)
Notification of changes of information	63.9(j)

Reports	
Reports of deviation	63,11430
Initial/repeat performance test	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63..8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)

Recordkeeping	
Information used to demonstrate compliance	63.11423(b), 63.10

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 none of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.

Respondent Activities
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure control devices, bag leak detection system, and air scavenging systems for control device.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 3, 3A, 3B, 5, 5D 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.

Agency Activities

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a through 1f document the computation of individual “burdens” for the recordkeeping and reporting requirements applicable to the industry for each of the subparts 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 combined, average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,217 hours (Total Labor Hours from Table 1a through 1f below). These hours are based on Agency studies and background documents from the development of the regulations, 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	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “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.

Standard	Respondent Burden Hours	Respondent Burden Costs
Subpart LLLLLL	3	\$297
Subpart MMMMMM	0	\$0
Subpart NNNNNN	171	\$16,717
Subpart OOOOOO	886	\$86,694
Subpart PPPPPP	1,554	\$151,974

Subpart QQQQQQ	603	\$58,945
Total	3,217	\$314,627

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

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

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents ₁	(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)
Fabric Filter for Lead Acid Battery	\$4,840	0	\$0	\$0	0	\$0
Total			\$0			\$0

¹ There are no new lead acid battery manufacturing expected during the next three-year period of this ICR

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 \$0. This is the total of column G.

The combined, 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 \$0. 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 combined average annual Agency cost during the three years of the ICR is estimated

to be \$1,658.

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), 2013 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 Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

Standard	Agency Burden Hours	Agency Burden Costs
Subpart LLLLLL	0	\$0
Subpart MMMMMM	0	\$0
Subpart NNNNNN	5	\$207
Subpart OOOOOO	5	\$207
Subpart PPPPPP	28	\$1,244
Subpart QQQQQQ	0	\$0
Total	38	\$1,658

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 956 existing respondents will be subject to these standards. The existing respondents include: 1 acrylic and modacrylic fiber production facility, 0 carbon black production facility, 2 chromium compound manufacturing facilities, 500 flexible polyurethane foam production and fabrication facilities, 60 lead acid battery manufacturing facilities, and 393 wood preserving facilities. 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 956 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	956	0	0	956
2	0	956	0	0	956
3	0	956	0	0	956
Average	0	956	0	0	956

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 956.

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
Subpart LLLLLL – Acrylic and Modacrylic Fiber Production Sources				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0
Startup, Shutdown, Malfunction Plan	0	1	1	1
Subpart MMMMMM – Carbone Black Production Sources				
N/A	0	0	0	0
Subpart NNNNNN – Chemical Manufacturing: Chromium Compound Sources				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0
Startup, Shutdown, Malfunction Plan	0	1	0	0
Semiannual report	1	2	0	2
Subpart OOOOOO – Flexible Polyurethane Foam Production and Fabrication Sources				
Notification of compliance status (facilities not using methylene chloride)	0	1	0	0

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of compliance status (facilities using methylene chloride)	0	1	0	0
Pre-compliance report	0	1	0	0
Initial notification of applicability	0	1	0	0
Semiannual Reports	1	2	0	2
Subpart PPPPPP – Lead Acid Battery Manufacturing Sources				
Initial notification of applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Initial/repeat performance test	0	1	0	0
Semiannual report	6	2	0	12
Subpart QQQQQQ – Wood Preserving Sources				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	393	393
			Total	410

The number of Total Annual Responses is 410.

The total annual labor costs are \$314,627. Details regarding these estimates may be found below in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 3,217 at a cost of \$314,627. Details regarding these estimates may be found in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam

Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 38 labor hours at a cost of \$1,658. See below Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal)

6(f) Reasons for Change in Burden

There is an overall decrease in the respondent and Agency burden in this ICR compared to the most-recently approved ICR. The decrease in burden and cost estimates occurred because these standards has been in effect for more than three years and the requirements are different during the initial compliance period as compared to the on-going compliance period. The previous ICR reflected those burdens and costs associated with initial activities such as submitting initial notification reports, conducting performance tests, and establishing SSM plans. This ICR reflects the on-going burden and costs for existing facilities, including submitting semiannual reports. Note the standard does not impose regular reporting requirements for all subject area source sectors.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 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-2013-0346. 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), WJC 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-2013-0346 and OMB Control Number 2060-0598 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 1a: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subparts LLLLLL) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions ^c	8	1	8	0.33	2.64	0.13	0.26	\$296.97
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						3.03		\$296.97
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data ^d	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel ^d	N/A							
G. Time for audits ^d	N/A							
Subtotal for Recordkeeping Requirements						0		\$0
TOTAL LABOR BURDEN AND COST (rounded)						3		\$297

Assumptions:

^a There is one existing acrylic and modacrylic production facility that is an area source. No new sources are projected during the 3-year term of this ICR.

^b This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

^c We assume the one existing respondent will review the regulations once every three years.

^d No hours or costs are associated with this item because the rule imposes no additional burden.

Table 1b: Annual Respondent Burden and Cost – NESHAP for Area Sources: Carbon Black Production (40 CFR Part 63, Subparts M-M-M-M-M-M) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondent s per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	8	1	8	0	0	0	0	\$0
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						0		\$0
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		\$0
TOTAL LABOR BURDEN AND COST (rounded)						0		\$0

Assumptions:

^a There is zero existing carbon black production facility that is an area source. No new sources are projected during the 3-year term of this ICR.

^b This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18

per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

Table 1c: Annual Respondent Burden and Cost – NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subparts NNNNNN) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	8	1	8	0.67	5.36	0.27	0.54	\$602.95
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Initial performance test ^d	40	1	40	0	0	0	0	\$0
Daily check of water flow ^c	0.25	365	91.25	1	91.25	4.56	9.13	\$10,264.71
Monthly inspections of control devices ^c	4	12	48	1	48	2.4	4.8	\$5,399.52
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
Semiannual report ^e	2	2	4	1	4	0.2	0.4	\$449.96
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						170.91		\$16,717.14
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data ^c	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel ^c	N/A							
G. Time for audits ^c	N/A							
Subtotal for Recordkeeping Requirements						0		\$0

TOTAL LABOR BURDEN AND COST (rounded)		171	\$16,717
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Assumptions:

^a There are two existing chemical manufacturing: chromium compounds facilities that are area sources . No new sources are projected during the 3-year term of this ICR. We assume the two existing respondents will review regulations once during the three-year ICR period ($2/3=0.67$).

^b This ICR uses the following labor rates \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

^c We have assumed that only one facility must implement control device inspection on a recurring basis, so the number of respondents per year is one.

^d We assumed that one facility needed to complete performance test, and that initial performance test has already been completed during the previous ICR period.

^e We have assumed that only one chromium plant will be required to complete semiannual reports.

^f No hours or costs are associated with this item because the rule imposes no additional burden.

Table 1d: Annual Respondent Burden and Cost – NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subparts OOOOOO) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	4	1	4	166.67	666.68	33.33	66.67	\$74,994.83
B. Required activities								
Initial notification of applicability ^c	4	1	4	0	0	0	0	\$0
Process parameter testing ^c	50	1	50	0	0	0	0	\$0
Monitoring equipment calibrations ^c	8	2	16	0	0	0	0	\$0
Storage tank measurement ^c	1	12	12	0	0	0	0	\$0
Pre-compliance report ^c	4	1	4	0	0	0	0	\$0
Notification of compliance status (facilities using methylene chloride) ^c	16	1	16	0	0	0	0	\$0
Notification of compliance status (facilities not using methylene chloride) ^d	1	1	1	0	0	0	0	\$0
Semiannual compliance status report ^c	4	2	8	1	8	0.4	0.8	\$899.92
Develop record system ^{c,e}	80	1	80	0	0	0	0	\$0
Time to train personnel ^{c,e}	80	1	80	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						775.88		\$75,894.75
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							

D. Record data c	8	12	96	1	96	4.8	9.6	\$10,799.04
E. Time to transmit or disclose information	See 3B							
F. Time for audits f	N/A							
Subtotal for Recordkeeping Requirements						110.4		\$10,799.04
TOTAL LABOR BURDEN AND COST (rounded)						886		\$86,694

Assumptions:

^a There are 500 existing flexible polyurethane foam production and fabrication facilities that are area sources. No new sources are projected during the 3-year term of this ICR. We assume the 500 existing sources will continue to read the rules and instructions once every 3 years ($500/3 = 166.67$).

^b This ICR uses the following labor rates \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

^c We have assumed that only one facility will be subject to this requirement. We assume this facility has already submitted initial notifications and reports.

^d We have assumed that there are 49 plants projected to be subject to this notification, and that initial notifications have been submitted during the previous ICR period.

^e We have assumed that it will take one respondent 80 hours to complete each of these tasks.

^f We have assumed that no hours or costs are will be associated with this item because the rule imposes no additional burden.

Table 1e: Annual Respondent Burden and Cost – NESHAP for Area Sources: Lead Acid Battery Manufacturing (40 CFR Part 63, Subparts PPPPPP) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondent s per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Annualized initial labor costs ^c	55	1	55	0	0	0	0	\$0
4. Reporting Requirements								
A. Read instructions	8	1	8	20	160	8	16	\$17,998.40
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Initial/repeat performance test ^d	40	1	40	0	0	0	0	\$0
Periodic monitoring – daily	0.5	365	182.5	6	1,095	54.75	109.5	\$123,176.55
Notification of compliance status	2	1	2	0	0	0	0	\$0
Semiannual inspection ^e	6	2	12	6	72	3.6	7.2	\$8,099.28
Semiannual report ^e	2	2	4	6	24	1.2	2.4	\$2,699.76
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Subtotal for Reporting Requirements						1,553.65		\$151,973.99
4. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
Subtotal for Recordkeeping Requirements						0		\$0
TOTAL LABOR BURDEN AND COST (rounded)						1,554		\$151,974

Assumptions:

^a There are 60 existing Lead Acid Battery Manufacturing facilities that are area sources. No new sources are projected during the 3-year term of this ICR. We assume the 60 existing sources will review regulations once every 3 years ($60/3 = 20$).

^b This ICR uses the following labor rates \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

^c We have assumed that the average number of respondents for annualized initial labor costs reflects only six facilities that do not have monitoring in their State permits.

^d We have assumed that most sources conducted NSPS performance test, and 15 tests were conducted during the previous ICR period. No new tests are expected for this ICR period.

^e We have assumed that only six lead acid battery plants will be required to complete semiannual reports.

Table 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subparts QQQQQ) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technica l person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	4	1	4	131	524	26.2	52.4	\$58,944.76
B. Required activities								
Initial notification of applicability and compliance status	2	1	2	0	0	0	0	\$0.00
Check list of best management practices	1	1	1	0	0	0	0	\$0.00
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Subtotal for Reporting Requirements						602.6		\$58,944.76
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data ^c	N/A							
E. Time to transmit or disclose information	N/A							
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		\$0
TOTAL LABOR BURDEN AND COST (rounded)						603		\$58,945

Assumptions:

^a There are 393 existing wood preserving facilities that are area sources. No new sources are projected during the 3-year term of this ICR. We assume the existing sources will review regulations once every 3 years ($393/3 = 131$).

^b This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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.

^c We have assumed that there are no hours or costs associated with this item because the rule imposes not additional burden for this item.

Table 2a: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subparts LLLLLL) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan ^c	4	1	4	0	0	0	0	\$0
Initial notification of compliance status ^c	4	1	4	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST(rounded)						0		\$0

Assumptions:

^a There is one existing acrylic and modacrylic production facility that is an area source. There will be no new additional sources during the next three years of this ICR. We assume all existing sources have met initial rule requirements.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.

^c We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2b: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Carbon Black Production (40 CFR Part 63, Subparts M-M-M-M-M-M-M) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
Initial notification of compliance status	4	1	4	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)						0		\$0

Assumptions:

^a There is zero existing carbon black production facility. No new sources are projected during the three-year term of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.

Table 2c: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subparts NNNNNN) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan ^c	4	1	4	0	0	0	0	\$0
Initial notification of compliance status ^c	4	1	4	0	0	0	0	\$0
Semiannual reports	2	2	4	1	4	0.2	0.4	\$207.30
TOTAL ANNUAL BURDEN AND COST (rounded)						5		\$207

Assumptions:

^a There are two existing chemical manufacturing: chromium compounds facilities that are area source. There will be no new additional sources during the next three years of this ICR. We assume existing sources have already met initial requirements.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.

^c We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2d: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subparts OOOOOO) (Renewal)

Activity	(A) EPA person hours per occurrence e	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year b
Report review:								
Initial notification of applicability ^c	2	1	2	0	0	0	0	\$0
Pre-compliance report ^c	2	1	2	0	0	0	0	\$0
Notification of compliance status ^d	4	1	4	0	0	0	0	\$0
Semiannual compliance status report ^c	2	2	4	1	4	0.2	0.4	\$207.30
Notification of special compliance ^c	2	1	2	0	0	0	0	\$0
Change in selected emission limit and compliance method ^c	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustments to time periods, and changes in information ^c	2	1	2	0	0	0	0	\$0
Progress reports for extensions ^c	2	1	2	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)						5		\$207

Assumptions:

^a There are 500 existing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. We assume existing facilities have already met initial requirements.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.

^c We have assumed that only one plant would be subject to these items.

^d We have assumed that there are 49 plants subject to this notification. However, existing plants have already met initial requirements.

Table 2e: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Lead Acid Battery Manufacturing (40 CFR Part 63, Subparts P P P P P P) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Semiannual report ^c	2	2	4	6	24	1.2	2.4	\$1,243.79
Initial notification of compliance status ^d	4	1	4	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)						28		\$1,244

Assumptions:

^a There are 60 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. We assume existing sources have already met initial requirements.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.

^c We have assumed that 10 percent of respondents will review semiannual reports.

^d We have assumed that each respondent will take 4 hours once per year to complete task.

Table 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subparts QQQQQQ) (Renewal)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year ^b
Report review:								
Initial notification of applicability ^c	2	1	2	0	0	0	0	\$0
Initial notification of compliance status ^d	4	1	4	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)						0		\$0

Assumptions:

^a There are 393 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. We assume existing facilities have already met initial requirements.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.