

SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised), EPA ICR Number 1869.08, OMB Control Number 2060-0434.

1(b) Short Characterization/Abstract

The amendments to this ICR are a result of the review of the existing NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR part 63, Subpart OOO) as required by the Clean Air Act. The NESHAP published at 40 CFR part 63, subpart OOO were proposed on December 14, 1998, and promulgated on January 20, 2000. The current proposed rulemaking applies to hazardous air pollutant (HAP) emissions from facilities involved in the manufacture of amino/phenolic resins (APR). This information is being collected to assure compliance with 40 CFR part 63, subpart OOO. Organic HAP emissions are the pollutants regulated under this subpart.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. Semiannual summary reports are also required.

The proposed rulemaking would amend title 40, chapter I, part 63 subpart OOO to include emission sources for which standards were not previously developed. The proposed amendments also add requirements to monitor each pressure relief device (PRD) that releases to the atmosphere using a device or system that is capable of identifying and recording the time and

duration of each pressure release and of notifying operators that a pressure release has occurred. Information related to these new provisions is required to be submitted in the semi-annual reports required by the existing NESHAP. The proposed amendments also add provisions for facility owners or operators to use if they wish to assert an affirmative defense to avoid civil penalties for exceedances of the applicable standards that are caused by a malfunction. If these provisions are used, the owner or operator is required to meet certain criteria during the malfunction, notify the Administrator of malfunctions that may cause an exceedance of the emissions standards, and submit a report for the malfunction to the Administrator. We believe that the number of affected facilities under this subpart will remain constant for this source category. The overall change in burden found in this ICR reflect the provision changes, an update in the cost of labor, and corrections to the number of affected facilities found in EPA ICR number 1869.08.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.” The overall change in burden found in this ICR reflect the provision changes, an update in the cost of labor, and corrections to the number of affected facilities found in EPA ICR number 1869.08.

The period considered in this ICR and throughout this supporting statement is the first three years following the promulgation of the amended Manufacture of Amino/Phenolic Resins NESHAP. The estimates of the size of the regulated universe are based on data from the National Emissions Inventory (NEI) database. There is an annual average of 18 respondents that will be subject to the regulations, except only two facilities have continuous process vents. Due to the nature of the industry, it is estimated that no additional sources will become subject to the standard over the next three years.

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a)

states that the Administrator may require any owner or 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 the 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 standards 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. In addition, the collected information is 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 tests, 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that 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.

The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

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

3(a) Non-duplication

A search of EPA's existing standards and ongoing ICR's revealed no duplication of information gathering efforts. However, certain reports required by State or local agencies may duplicate information required by this NESHAP. In these cases, a copy of the report submitted to the State or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

This ICR is related to proposed amendments to 40 CFR part 63, subpart OOO for the APR source category. Comments will be solicited on the proposal package and the proposed ICR.

3(c) Consultations

Over the next three years, an average of 18 facilities per year will be subject to the standard (except only two facilities have continuous process vents), with no additional sources per year becoming subject to the standard. In estimating the affected number of sources and the growth rate of the amino/phenolic resins manufacturing industry subject to this standard, we

referenced the most recent ICR, and used other resources to obtain the most recent data available. We reviewed information available from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

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 are consistent with the regulations established by OMB at 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 the five years. Without the five-year record retention, 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 (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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents

The respondents affected by the amendments to 40 CFR part 63, subpart OOO are facilities that manufacture amino/phenolic resins. The United States Standard Industrial Classification (SIC) codes, which correspond to the North American Industry Classification System (NAICS) codes, could be found in the following table:

Manufacture of Amino/Phenolic Resins (40 CFR part 63, subpart OOO)	SIC Codes	NAICS Codes
Plastics Material and Resin Manufacturing	2821	325211

4(b) Information Requested

None of these reporting and recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

All data in this ICR that is recorded and/or reported is required by National Emission Standards for Hazardous Air Pollutants for the Manufacture of Amino/Phenolic Resins (40 CFR part 63, subpart OOO).

A source must make the following reports:

Reports for 40 CFR part 63, subpart OOO
--

Notification of intent to construct or reconstruct	63.5, 63.1417(d)
Notification and report of construction date	63.5, 63.1400(j)
Notification of anticipated startup	63.5, 63.1400(j)
Actual startup notification	63.5, 63.1400(j)
Notification of modification	63.5, 63.1400(j)
Notification and report of performance test and results	63.7(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)
Malfunction reports	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)
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:

Recordkeeping for 40 CFR part 63, subpart OOO	
Five-year retention of records	63.1416(a)
Malfunction records	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

Respondent Activities
Read instructions
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 as applicable 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
Adjust existing ways to comply with any previously applicable instructions and requirements
Transmit, or otherwise disclose the information

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, affirmative defense reports, and quality control plan for CMS required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and

enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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

The impact on small entities was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the type of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 18,991 (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:

Technical \$54.66 (\$26.03 + 110%)
Managerial \$115.96 (\$55.22 + 110%)
Clerical \$38.14 (\$18.16 + 110%)

These labor rates are based on the May 2012 National Occupational Employment and Wage Estimates for the United States, occupational codes 51-8091 for chemical plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical).

(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 labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

As part of the proposed amendments to the APR NESHAP, facility owners or operators are required to monitor each PRD that releases to the atmosphere using a device or system that is capable of identifying and recording the time and duration of each pressure release and of notifying operators that a release has occurred. For purposes of estimating the costs of this requirement, we assumed that operators would install electronic indicators on each PRD in

organic HAP service that vents to the atmosphere. The cost of each monitoring system depends on the number of PRDs at the facilities. The total cost for these capital expenditures for the 18 facilities in the APR source category is estimated to be \$394,542. For continuous process vents, facility owners or operators would also be required to install controls to reduce HAP emissions by 85 percent. The capital costs associated with this requirement, assuming scrubbers would be used to attain this emissions reduction, are estimated to be \$1.1 million for the two facilities in the APR source category that have these types of process vents. There are also proposed standards for storage vessels at existing facilities. However, our data indicate that all storage vessels subject to the proposed standards are already in compliance, and no capital or annual costs are expected.

Annualized costs are calculated by multiplying the capital recovery factor by the capital cost. The capital recovery factor is 0.1098 based on an interest rate of 7 percent and an assumed equipment life of 15 years. The total annualized capital cost for the PRD monitors and continuous process vents requirements for the APR source category is \$397,522.

The annual operation and maintenance costs are the ongoing costs to maintain monitors and other costs such as photocopying and postage. Based on a previous ICR for the Pesticide Active Ingredient source category, which estimated the annual O&M costs to be \$1,450 per source in 2011 dollars, inflating this number from 2011 dollars to 2013 dollars gives \$1,505 per source. The total annual O&M cost for the 18 facilities in the APR source category is \$27,090.

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

Capital/Startup and Operation and Maintenance (O&M) Costs						
(A) Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents ^a	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Costs for One Respondent	(F) Number of Respondents ^a	(G) Total Annual Cost (E X F)
O&M	\$0	0	\$0	\$1,505	18	\$27,090
Continuous process vents scrubber systems	\$1,106,750 ^b	2	\$1,106,750	\$340,544 ^b	2	\$340,544
pH Monitor	\$1,000	2	\$2,000	\$300	2	\$600
Liquid flow monitor	\$500	2	\$1,000	\$100	2	\$200

Capital/Startup and Operation and Maintenance (O&M) Costs						
(A) Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents ^a	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Costs for One Respondent	(F) Number of Respondents ^a	(G) Total Annual Cost (E X F)
Monitoring equipment (PRD)	\$21,919	18	\$394,542	\$3,121	18	\$56,178
Total			\$1,504,292			\$424,612

^a We assume that there are 18 facilities in the Amino/Phenolic Resins category, however only 2 facilities operate continuous process vents.

^b Combined costs for both facilities.

The total capital/startup costs for this ICR are \$1,504,292. This is the total of column D in the above table. The total annualized capital costs and operation and maintenance (O&M) costs for this ICR are \$424,612 and are shown in column G.

(iv) Affirmative Defense/Root Cause Analysis/Malfunction Costs.

The EPA's estimate for the proposed provisions for an affirmative defense and root cause analysis is presented in the table below and is based on general experience to calculate the time and effort required of a source to review relevant data, interview plant employees, and reconstruct the events prior to a malfunction in order to determine primary and contributing causes. The level of effort also includes time to produce and retain the report in document form so that the source will have it available should EPA or state enforcement agencies ever request to review it.

The labor rates used to estimate the costs for preparing an affirmative defense have been increased by 110 percent to account for the benefit packages available to those employed by private industry. These rates are from the May 2012 National Occupational Employment and Wage Estimates United States for Production Occupations (http://www.bls.gov/oes/current/oes_nat.htm#51-0000).

Personnel	Number of Personnel	Time Requirement (hours)	Total Hours	Hourly Rate (\$/hr)	Total
Technical Personnel	3	6	18	\$54.66	\$984

Managerial Personnel	2	6	12	\$111.96	\$1,392
Total	5		30		\$2,375

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$15,443.

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 (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/2013-gs-hourlyovertime-rates-by-grade-and-step/>). 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 for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised).

6(d) Estimating the Respondent Universe and Total Burden and Costs

The number of respondents was updated based on the NEI database, which was used during the analysis to determine the MACT and information from the industry. The number of respondents is calculated using the following table which addresses the 3 years covered by this

ICR. Over the three year period of this ICR, we expect 18 existing facilities to be respondents.

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

YEAR	(A)	(B)	(C)	(D)	(E)
	Number of New Respondents	Number Existing Respondents	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	0	18	0	0	18
2	0	18	0	0	18
3	0	18	0	0	18
Avg	0	18	0	0	18

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 18.

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)
Initial notification and performance tests	2	1	0	2
Affirmative Defense	1	1	N/A	1
Semiannual periodic report	18	2	0	36
Total Number of Annual Responses				39

The number of Total Annual Responses is 39.

The total annual labor costs are \$1,062,090 for 18,991 labor hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised).

6(e) Bottom Line Burden Hours 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 18,991. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 487 hours per response. The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$424,612.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 343 labor hours at a cost of \$15,443. See below Table 2: Average Annual EPA Burden for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised).

6(f) Reasons for Change in Burden

The proposed rulemaking would amend title 40, chapter I, part 63 subpart OOO to include emission sources for which standards were not previously developed and requirements to monitor PRDs. Burden changes associated with these proposed amendments would result from new recordkeeping and reporting requirements associated with the PRD monitoring requirements and affirmative defense provisions for all facilities subject to the APR MACT standards. In addition, we estimate that two facilities will be subject to recordkeeping, reporting and monitoring requirements associated with the control of certain continuous process vents. In addition, the number of affected facilities is estimated to be 18, which is a decrease from the previous estimate of 37. The overall change in burden found in this ICR reflect the provision changes, an update in the cost of labor, and corrections to errors found in EPA ICR number

1869.08.

The EPA also provides an adjustment to this ICR that estimates the costs of the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. The EPA's estimate for the required notification, reports and records, including the root cause analysis, associated with a single incident totals approximately \$2,375 and is based on the time and effort required of a source to review relevant data, interview plant employees, and document the events surrounding a malfunction that has caused an exceedance of an emission limit. The estimate also includes time to produce and retain the records and reports for submission to the EPA. For the purpose of estimating the annual burden, the EPA is attributing a total of 3 instances of affirmative defense over a 3 year period across all sources in the category. The EPA is using this frequency of 3 events in 3 years, because of the number of excess emission events reported by source operators, only a small number would be expected to result from a malfunction, and only a subset of excess emissions caused by malfunctions would result in the source choosing to assert the affirmative defense. Thus we believe the number of instances in which source operators might be expected to avail themselves of the affirmative defense will be extremely small.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 487 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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's 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-OAR-2012-0133. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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 Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2012-0133 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 of Reporting and Recordkeeping Requirements for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised)

Burden item	(A) Person hours per occurrence ^a	(B) No. of occurrences per respondent per year ^b	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^c (\$)
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read rule and instructions	16	1	16	18	288	14.4	28.8	\$18,510
B. Plan activities	8	1	8	18	144	7.2	14.4	\$9,255
C. Training	16	1	16	18	288	14.4	28.8	\$18,510
D. Create information ^d	320	1	320	0.9	288	14.4	28.8	\$18,510
E. Gather existing information	208	1	208	18	3,744	187.2	374.4	\$240,634
F. Write Report								
a. Pre-compliance report	20	1	20	0	0	0	0	\$0
b. Notification of compliance status	20	1	20	0	0	0	0	\$0
c. Semiannual summary report	40	2	80	18	1,440	72	144	92,552
d. Reports of malfunctions	20	2	40	18	720	36	72	\$46,276
e. Other reports	8	2	16	18	288	14.4	28.8	\$18,510
f. Affirmative defense ^e	30	1	30	1	18	12	0	\$2,375
Subtotal for Reporting Requirements						8,310		\$465,132
4. Recordkeeping requirements								
A. Read instructions	8	1	8	18	144	7.2	14.4	\$9,255
B. Plan activities	8	1	8	18	144	7.2	14.4	\$9,255
C. Implement activities								
a. Malfunction records	6	2	12	18	216	10.8	21.6	\$13,883
b. Monitoring records	24	2	48	18	864	43.2	86.4	\$55,531
c. Batch process vent records	24	2	48	18	864	43.2	86.4	\$55,531
d. Aggregate batch vent stream records	24	2	48	18	864	43.2	86.4	\$55,531
e. Leak detection and repair records	24	2	48	18	864	43.2	86.4	\$55,531
f. Other records and documentation	24	2	48	18	864	43.2	86.4	\$55,531
D. Develop record system								
a. Record/disclose information	16	2	32	18	576	28.8	57.6	\$37,021

Burden item	(A) Person hours per occurrence ^a	(B) No. of occurrences per respondent per year ^b	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^c (\$)
b. Store, file, and maintain information	4	2	8	18	144	7.2	14.4	\$9,255
E. Time to enter information								
a. Malfunction records	4	2	8	18	144	7.2	14.4	\$9,255
b. Monitoring records	4	2	8	18	144	7.2	14.4	\$9,255
c. Batch process vent records	4	2	8	18	144	7.2	14.4	\$9,255
d. Aggregate batch vent records	4	2	8	18	144	7.2	14.4	\$9,255
e. Other records and documentation	8	2	16	18	288	14.4	28.8	\$18,510
F. Time to train personnel								
a. Control equipment inspect and monitor	40	2	80	18	1,440	72	144	\$92,552
b. Leak detection and repair	40	2	80	18	1,440	72	144	\$92,552
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						10,681		\$596,958
TOTAL LABOR BURDEN AND COST (rounded)						18,991		\$1,062,090

N/A = Not applicable

^a Estimate of burden for each activity, technical hours only.

^b Estimate based on average facilities.

^c Costs are rounded and based on the following hourly rates: Technical at \$54.66, Management at \$115.96, and Clerical at \$38.14.

^d Assumes 5% of the performance tests will be repeated during each successive year. Assumed to be 280 technical hours for testing and an additional 40 hours for establishment of parameter monitoring levels for a total of 320 respondent hours per occurrence.

^e Assumes 3 affirmative defense reports for entire industry during the 3-year ICR period. For affirmative defense, hours required assumes 18 hours technical, 12 hours management, and 0 hours clerical for each instance of affirmative defense. Formulas not followed for person hours per year

Table 2: Average Annual EPA Burden for the Proposed NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Revised)

Burden Item	(A) EPA person- hours per occurrence	(B) No. of occurrence s per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plant s per year	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
Initial performance test	N/A							
Repeat performance test	20	1	20	0.9	18	0.9	1.8	\$933
REPORT REVIEW								
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of modification	N/A							
Notification of compliance status	N/A							
Notification of performance test	4	1	4	2	8	0.4	0.8	\$415
Notification of process change	N/A							
Notification of inspection of storage vessel	N/A							
Notification of change in primary product	N/A							
Pre-compliance report	N/A							
Storage vessel initial compliance demonstration	N/A							
Semiannual summary report	4	2	8	18	144	7.2	14.4	\$7,462
Reports of malfunctions	2	2	4	18	72	3.6	7.2	\$3,731
Other reports	2	2	4	18	72	3.6	7.2	\$3,731
Affirmative defense	2	1	2	1	2	0.1	0.2	\$104
TOTAL ANNUAL EPA BURDEN AND COST (Rounded)						343		\$15,443

(a) Agency labor rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay. Salary Table 2013-GS. Labor rates are inflated to reflect average locality pay increase from base rates. Available at <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/2013-gs-hourlyovertime-rates-by-grade-and-step/>

