

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (Revised)

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (Revised), EPA ICR Number 1871.07, OMB Control Number 2060-0420.

1(b) Short Characterization/Abstract

The amendments to this ICR are a result of the review of the existing NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, Subpart YY) as required by the Clean Air Act. The NESHAP published at 40 CFR part 63, subpart YY were proposed on October 14, 1998, promulgated on June 29, 1999, and amended on: November 22, 1999, November 2, 2001, June 7, 2002, and July 7, 2002. These regulations apply to existing facilities and new facilities of the following four categories: Polycarbonates (PC) Production, Acrylic and Modacrylic Fibers (AMF), Acetal Resins (AR) Production, and Hydrogen Fluoride (HF) Production. The current proposed rulemaking applies to hazardous air pollutant (HAP) emissions from facilities in the PC and AMF source categories. This information is being collected to assure compliance with 40 CFR part 63, subpart YY. 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 YY to include

emission sources for which standards were not previously developed for the AMF source category. For the PC and AMF source categories, it also revises the requirements for leak detection and repair (LDAR) to allow only one of the previously available compliance options, although monitoring of connectors will not be required. For both source categories, 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 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 these source categories. 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 AMF and PC MACT standards. 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 1871.06.

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 1871.06.

The period considered in this ICR and throughout this supporting statement is the first three years following the promulgation of the amended NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, Subpart YY) for the AMF and PC source categories. The estimates of the size of the regulated universe are based on data from the National Emissions Inventory (NEI) database, and information from the industries. There is an annual average of 4 PC Production facilities and 1 AMF Production facility that will

be subject to the regulations. Due to the nature of the industries, 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 PC, AMF, AR and HF production cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for these source categories at 40 CFR part 63, subpart YY.

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 YY for the AMF and PC source categories. Comments will be solicited on the proposal package and the proposed ICR.

3(c) Consultations

Over the next three years, an average of 4 PC production facilities, 1 AMF production facility, 2 AR production facilities and 1 HF production facility will be subject to the standard and are affected by the amendments to 40 CFR part 63, subpart YY. In estimating the affected number of sources and the growth rate of these source categories 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 YY are facilities that produce polycarbonates and acrylic and modacrylic fibers. 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:

Standard (40 CFR part 63, subpart YY)	SIC Codes	NAICS Codes
Polycarbonates (PC) Production (Synthetic Rubber Manufacturing)	2822	325211
Acrylic and Modacrylic Fibers (AMF) Production (Manmade Organic Fibers, Except Cellulosic)	2824	325220
Acetal Resins (AR) Production (Plastic Materials, Synthetic and Resins, and Nonvulcanizable Elastomers)	2821	325211
Hydrogen Fluoride (HF) Production (Industrial Inorganic Chemicals, Not Elsewhere Classified)	2819	325188

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 Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY).

A source must make the following reports:

Notifications for 40 CFR part 63, subpart YY	
Application for approval of construction/reconstruction	63.5(d), 63.1110(a)
Notification of initial startup	63.1110(b)
Notification of initial applicability	63.9(b), 63.1110(a), 63.1110(c)
Notification of compliance status	63.9(h), 63.1110(d), 63.1110(a)
Notification and report of performance test and results	63.7(b), 63.9(e), 63.10(d)(2), 63.1110(d), 63.1110(a)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Notification of physical or operational change	63.8(a)
Opacity or visible emissions	63.10(d)(3)
Excess emissions and continuous parameter monitoring systems	63.1110(a)

(CPMS) performance reports	
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Reports for 40 CFR part 63, subpart YY	
Periodic reports (Semiannual or according to the schedule for Title V) with information on excess emissions and on the implementation of leak detection and repair standard provisions	63.1110(e), 63.1108(a), 63.1109

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart YY	
Maintain records of startup, shutdown, malfunctions periods when excess emissions have occurred during the reporting period	63.10(b)(2), 63.1109(a)
Maintain records of performance test and performance evaluation results	63.1109(a)
Maintain records of all reports and notifications	63.10(b), 63.1109(a)
Maintain record of applicability	63.10(b)(3), 63.1109(d)
Maintain records of initial and compliance status notifications	63.1416(e)
Records of CPMS operation adjustments, calibration checks, and maintenance	63.10(b)(2)(vii), 63.1109(a)
Records of implementation of leak detection and repair (LDAR) standards provision	63.1107
Records are required to be retained for five years	63.10(b)(2)

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 CMS for opacity, or for pressure drop and liquid supply pressure for CPMS.
Perform initial performance test, and repeat performance tests if necessary.
Write the notifications and reports listed above
Enter information required to be recorded above
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information
Train personnel to be able to respond to a collection of information
Transmit, or otherwise disclose the information

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, excess emissions reports, affirmative defense reports, and quality control plan for CMS required to be submitted by industry.
Audit facility records.
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 year

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 Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (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 industries for 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 average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,659 (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 AMF and PC 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 cost for this system for the one facility in the AMF source category is expected to be \$37,063, and the total cost for these capital expenditures for the 4 facilities in the PC source category is estimated to be \$50,596. For equipment leaks, facility owners or operators would also be required to follow the leak detection and repair (LDAR) requirements of part 63, subpart UU, rather than part 63 subpart TT under the proposed amendments to the AMF and PC NESHAP, with the exception of the connector monitoring requirements. The capital costs associated with this requirement are estimated to be \$1,428 for the AMF source category and \$15,596 for the PC source category.

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 and LDAR requirements for the AMF source category is \$5,500 and is \$9,380 for the PC source category.

The annual operation and maintenance costs are the ongoing costs to maintain the 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 AMF source category is \$1,505 and for the PC source category it is \$6,020.

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

Capital/Startup and Operation and Maintenance (O&M) Costs						
(A) Source Category and Cost Type	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Costs for One Respondent	(F) Number of Respondents	(G) Total Annual Cost (E X F)
PC (O&M)	\$0	0	\$0	\$1,505	4	\$6,020
PC (PRD)	\$12,649	4	\$50,596	\$1,804	4	\$7,216
PC (LDAR)	\$3,899	4	\$15,596	\$541	4	\$2,164
AMF (O&M)	\$0	0	\$0	\$1,505	1	\$1,505
AMF (PRD)	\$37,063	1	\$37,063	\$5,277	1	\$5,277
AMF (LDAR)	\$1,428	1	\$1,428	\$223	1	\$223
AR ^{1,2}	\$0	0	\$0	\$134	2	\$268
				\$7,500	2	\$15,000
HF ^{1,3}	\$0	0	\$0	\$134	1	\$134
				\$4,373	1	\$4,373
Total			\$104,683			\$42,180

¹We have assumed that each source will respond 5 times per year to comply with the rule at a total cost of \$134 per source to cover costs. This estimate is based on the assumption that it takes 0.5 hours to conduct these tasks at a clerical labor rate of \$38.14 per hour for a total labor cost of \$19.07 per response. First-class postage is estimated at \$7.63 per response.

²Based on our consultation with affected entities, we estimate that \$7,500 per year are required on LDAR monitoring for the AR MACT.

³Based on our consultation with affected entities, we estimate that 80 technical hours per year are required to maintain and calibrate the scrubber, monitor, and related instruments for the HF MACT unit (\$54.66/hr x 80 hr = \$4,373).

The total capital/startup costs for this ICR are \$104,683. 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 \$42,180 and are shown in column G.

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

The EPA's estimate for an affirmative defense and root cause analysis in the table below 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	\$115.96	\$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 \$4,291.

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 Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (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 8 existing facilities to be respondents (4 in the PC source category, 1 in the AMF source category, 1 in the HF source category and 2 in the AR source category).

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

	(A)	(B)	(C)	(D)	(E)
YEAR	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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Avg	0	8	0	0	8

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 8.

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 requirements for PC Production	4	1	N/A	4
Initial requirements for AMF Production	1	1	N/A	1
Periodic reports for PC Production	4	2	N/A	8
Periodic reports for AMF Production	1	2	N/A	2
Periodic reports for AR Production	2	2	N/A	4
Periodic reports for HF Production	1	2	N/A	2
LDAR reports for PC Production	4	2	N/A	8
LDAR reports for AMF Production	1	2	N/A	2
LDAR reports for AR Production	2	2	N/A	4
LDAR reports for HF Production	1	2	N/A	2
Affirmative Defense for PC Production	1	1	N/A	1
Affirmative Defense for AMF Production	1	1	N/A	1
Total Number of Annual Responses				39

The number of Total Annual Responses is 39 (rounded).

The total annual labor costs are \$213,445 for 3,659 labor hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (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 3,659. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping

Requirements for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (Revised).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 94 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$42,180. The cost calculations are detailed in Section 6(b)(ii).

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 95 labor hours at a cost of \$4,291. See below Table 2: Average Annual EPA Burden for the Proposed NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY).

6(f) Reasons for Change in Burden

The proposed rulemaking would amend title 40, chapter I, part 63 subpart YY to include emission sources for which standards were not previously developed for the AMF source category, revisions to the LDAR requirements for the PC and AMF source categories, and requirements to monitor PRDs. The number of affected facilities under this subpart is not expected to increase. At this time, none of the proposed amendments will affect area sources. 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 1871.06.

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 each 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 94 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), WJC 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 2060-0420 in any correspondence.

Part B of the Supporting Statement

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

Burden Item	(A) Person-hours per occurrence ^a	(B) No. of occurrences per source per year ^b	(C) Person-hours per source per year (C=AxB)	(D) Respondents per year ^c	(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) Cost,\$ ^d
Polycarbonates (PC)	1	2	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	1	2	2	1	2	0.1	0.2	\$129
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	\$257
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	\$129
a. Closed vent system								
Polycarbonates (PC)	1	2	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	1	2	2	1	2	0.1	0.2	\$129
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	\$257
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	\$129
Control devices								
a. Initial requirements design analysis, performance test (e)								
Acrylic and Modacrylic Fibers (AMF)	80	1	80	1	80	4	8	\$5,142
b. Operate and maintain CMS								
Polycarbonates (PC)	8	12	96	4	384	19.2	38.4	\$24,680
Acrylic and Modacrylic Fibers (AMF)	8	12	96	1	96	4.8	9.6	\$6,170
Acetal Resins (AR)	8	12	96	2	192	9.6	19.2	\$12,340
Hydrogen Fluoride (HF)	8	12	96	1	96	4.8	9.6	\$6,170
Pressure relief devices								
Polycarbonates (PC)	2	1	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	\$129
Leak detection and repair program								
a. Initial requirements: Identify all affected streams ^(e)								
Polycarbonates (PC)	2	1	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	\$129

Burden Item	(A) Person-hours per occurrence ^a	(B) No. of occurrences per source per year ^b	(C) Person-hours per source per year (C=AxB)	(D) Respondents per year ^c	(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) Cost,\$ ^d
b. Perform monitoring/repairs								
Polycarbonates (PC)				4				\$6,020
Acrylic and Modacrylic Fibers (AMF)				1				\$1,505
Acetal Resins (AR)	16	12	192	2	384	19.2	38.4	\$24,680
Hydrogen Fluoride (HF) ^(j)	0.1	1092	109	1	109	5.5	10.9	\$7,006
Container vapor tightness certification	N/A							
D. Develop Record System								
Develop startup, shutdown, malfunction plan	N/A							
Control equipment ^(e)								
Spinning Lines (AMF)	2	1	2	1	2	0.1	0.2	\$129
Pressure relief devices								
Polycarbonates (PC)	2	1	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	\$129
Leak detection and repair program								
Polycarbonates (PC)	44	1	44	4	176	8.8	17.6	\$11,312
Acrylic and Modacrylic Fibers (AMF)	44	1	44	1	44	2.2	4.4	\$2,828
E. Record All Information Required by Standards								
Initial requirements	N/A							
Control equipment inspections								
Polycarbonates (PC)	1	2	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	1	2	2	1	2	0.1	0.2	\$129
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	\$257
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	\$129
Control equipment monitoring ^(k)								
Polycarbonates (PC)	1	52	52	4	208	10.4	20.8	\$13,369

Burden Item	(A) Person-hours per occurrence ^a	(B) No. of occurrences per source per year ^b	(C) Person-hours per source per year (C=AxB)	(D) Respondents per year ^c	(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) Cost,\$ ^d
Acrylic and Modacrylic Fibers (AMF)	1	52	52	1	52	2.6	5.2	\$3,342
Acetal Resins (AR)	1	52	52	2	104	5.2	10.4	\$6,684
Hydrogen Fluoride (HF)	1	52	52	1	52	2.6	5.2	\$3,342
Control device CMS								
Polycarbonates (PC)	1	12	12	4	48	2.4	4.8	\$3,085
Acrylic and Modacrylic Fibers (AMF)	1	12	12	1	12	0.6	1.2	\$771
Acetal Resins (AR)	1	12	12	2	24	1.2	2.4	\$1,543
Hydrogen Fluoride (HF)	1	12	12	1	12	0.6	1.2	\$771
Pressure relief devices								
Polycarbonates (PC)	2	1	2	4	8	0.4	0.8	\$514
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	\$129
Leak detection and repair program								
Polycarbonates (PC)	20	1	20	4	80	4	8	\$5,142
Acrylic and Modacrylic Fibers (AMF)	20	1	20	1	20	1	2	\$1,285
Acetal Resins (AR)	16	1	16	2	32	1.6	3.2	\$2,057
Hydrogen Fluoride (HF)	16	1	16	1	16	0.8	1.6	\$1,028
F. Time to Train Personnel								
Material determination methods	N/A							
Control equipment inspection and monitoring ⁽ⁱ⁾								
Polycarbonates (PC)	8	1	8	4	32	1.6	3.2	\$2,057
Acrylic and Modacrylic Fibers (AMF)	8	1	8	1	8	0.4	0.8	\$514
Acetal Resins (AR)	8	1	8	2	16	0.8	1.6	\$1,028
Hydrogen Fluoride (HF)	8	1	8	1	8	0.4	0.8	\$514
Leak detection and repair program ^(h,i)								
Polycarbonates (PC)	10	1	10	4	40	2	4	\$2,571
Acrylic and Modacrylic Fibers (AMF)	10	1	10	1	10	0.5	1	\$643
Acetal Resins (AR)	2	1	2	2	4	0.2	0.4	\$257

Burden Item	(A) Person- hours per occurrence ^a	(B) No. of occurrences per source per year ^b	(C) Person- hours per source per year (C=AxB)	(D) Responses per year ^c	(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) Cost,\$ ^d
Hydrogen Fluoride (HF)	2	1	2	1	2	0.1	0.2	\$129
Container leak tight method	N/A							
RECORDKEEPING SUBTOTAL (Rounded)						3,168		\$184,594
TOTAL LABOR BURDEN AND COST (Rounded)						3,659		\$213,445

N/A = Not Applicable.

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

(b) Estimate based on average facilities.

(c) We have assumed that there are 8 existing sources (4 PC, 1 AMF, 2 AR, and 1 HF) and that no additional new sources will become subject to the rule over the next three years. We have also assumed that existing sources have already complied with this activity, except for facilities in the AMF and PC source categories subject to new requirements.

(d) Costs are rounded and based on the following hourly rates: Technical at \$54.66, Management at \$115.96, and Clerical at \$38.14 from May 2012 National Occupational Employment and Wage Estimates United States - Occupations. Mean Hourly Rate (http://www.bls.gov/oes/current/oes_nat.htm#51-0000).

(e) We have assumed that there will be no new sources over the next three years of this ICR. For PRDs located at PC and AMF, facilities are required to submit a Notification of Compliance Status within 150 days after the first applicable compliance date for pressure relief device monitoring.

(f) Initial notification requirements include: initial notifications, initial compliance determination, and initial performance tests.

(g) The rules requires that all sources submit periodic reports (semiannually or according to the schedule for Title V).

(h) The standards for equipment leak requires the submittal of an initial report and semiannual reports of leak detection and repair (LDAR) and any changes to the processes, monitoring frequency and initiation of a quality improvement program. We have assumed that sources are submitting the required LDAR information with the periodic reports

(i) Assumes 3 affirmative defense reports for each 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.

(j) Visual inspections are required once per shift with a total of three shifts per day, at seven days per week, for 52 weeks per year. (3x7x52) for a total of 1,092 inspections per year.

(k) We have assumed that control equipment monitoring should be done on a weekly basis.

(l) We have assumed that there will be some labor hours associated with rule analysis and training per year.

Table 2: Average Annual EPA Burden for the Proposed NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY)

Burden Item	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants 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) Agency Cost, \$ ^b
REPORT REVIEW								
Initial Requirements								
a. Initial notification (c)	2	1	2	0	0	0	0	\$0
b. Performance test (c)(d)	2	1	2	0	0	0	0	\$0
c. Compliance status (c)	4	1	4	5	20	1	2	\$1,036
d. Performance test reports (c)(d)	4	1	4	0	0	0	0	\$0
Periodic Requirements								
a. Periodic reports	3	2	6	5	30	1.5	3	\$1,555
b. Leak detection and repair reports	3	2	6	5	30	1.5	3	\$1,555
Affirmative defense (e)	2	0.7	1.4	2	2.8	0.1	0.3	\$145
TOTAL ANNUAL EPA BURDEN AND COST (Rounded)					95			\$4,291

(a) We have assumed that there are 8 existing sources (4 PC, 1 AMF, 2 AR, and 1 HF) and that no additional new sources will become subject to the rule over the next three years.

(b) 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/>

(c) We have assumed there will be no new sources over the next three years of this ICR. We have also assumed that existing sources have already complied with this activity, except for facilities in the AMF and PC source categories subject to new requirements.

(d) We have assumed that the Agency will not have additional burden from sources conducting performance tests due to a process change that may or may not result in the source meeting additional requirements.

(e) Assumes 2 affirmative defense reports for each 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.