SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal), EPA ICR Number 0186.13, OMB Control Number 2060-0071.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Vinyl Chloride were: 1) proposed on December 24, 1975; 2) promulgated on October 21, 1976; and 3) amended on June 7, 1977, September 30, 1986, September 23, 1988, December 23, 1992, and October 17, 2000. These standards apply to: exhaust gases and oxychlorination vents at ethylene dichloride (EDC) plants; exhaust gases at vinyl chloride monomer (VCM) plants; and exhaust gases, reactor opening losses, manual vent valves, and stripping residuals at polyvinyl chloride (PVC) plants. The standards also apply to relief valves and fugitive emission sources at all three types of plants. 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 61, subpart F.

In general, all NESHAP standards require initial notification reports, 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 three 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.

Over the next three years, an average of 18 respondents per year will be subject to the standard, and no additional respondents per year will become subject to these standards. This estimate accounts for the impact of the part 63 PVC NESHAP, which will become effective on April 17, 2015. Beginning on this date, a subset of existing sources subject to these standard will become subject to the part 63 rule, and will no longer need to comply with the part 61 NESHAP.

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

The respondents are EDC, PVC, and VCM plants in the United States, which are owned and operated by the vinyl chloride industry. None of the plants are owned by state, local, tribal, or the Federal government. The "burden" to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal). The Federal Government "burden" is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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 either 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, ethylene dichloride, vinyl chloride, and polymerized vinyl chloride emissions from EDC, PVC, and VCM plants 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 61, subpart F.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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 these 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 quarterly 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 61, subpart F.

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 35023) on June 11, 2013. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency’s industry experts have been consulted, and the Agency’s internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA’s database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standards

have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Vinyl Institute, at (571) 970-3283; and 2) the American Chemistry Council, at (202) 249-6706. The Vinyl Institute provided both editorial comments and technical corrections in response to the consultation. We have corrected the frequency of occurrence for submitting MVV/RVD reports in Table 1 to be consistent with the remaining supporting statement. In addition, we have revised the number of respondents to address the impact of the part 63 NESHAP rule on this standard.

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.

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.

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 EDC, VCM, and PVC manufacturing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2821, which corresponds to the North American Industry Classification System (NAICS) code 325211 for Plastics Material and Resin Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F).

A source must make the following reports:

Notifications/ Reports	
Notification and application of construction or modification	61.07
Notification of anticipated date of initial startup	61.09(a)(1)
Notification of actual startup	61.09(a)(2)
Notification of physical or operational change which may increase the emission rate	61.15
Notification of performance tests	61.13(f)
Notification of emissions testing	61.13(c)
Application for waiver of testing	61.13(i)(1), and 61.13(i)(2)
Application for equivalent equipment and procedures	61.66
Initial report	61.69
Quarterly report	61.70(a)(1)
Manual vent valve (MVV) discharge report	61.64(a)(3)
Relief valve discharge (RVD) report	61.65(a)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction, periods where the continuous monitoring system is inoperative	61.14(f)
Emission test results and other data needed to determine emissions	61.13(g), 61.71(1)

Recordkeeping	
	(3)
Records of leak detected	61.71(a)(1), 61.71(a)(2)
Performance test records, leaks detected, emissions records, and daily operating records are required to be retained on-site for three years	61.67(f), 61.71(a)

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 vinyl chloride CMS.
Perform initial performance test, Reference Method 106, 107, and or 601 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.

Respondent Activities
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

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

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for three 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 Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

6. Estimating the Burden and Cost of the Collection

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

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 7,603 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$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.

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

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such 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	(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)
CEMS	$150,000	0	$0	$45,000	18	$810,000

CEMS – Continuous emissions monitoring system.

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 $810,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $810,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $82,090.

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 Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

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

Based on our research for this ICR, approximately 26 existing sources are currently subject to the standard. After April 17, 2015 (year 2 of this ICR period), 12 of these sources will comply with the part 63 PVC NESHAP, and will no longer be subject to this standard. Of the remaining 14 sources, half will be subject only to this standard while half will be subject to both the part 61 and part 63 rules. 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 18 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(B) Number of Existing Respondents [2]	(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)

Number of Respondents					
1	0	26	0	0	26
2	0	14	0	0	14
3	0	14	0	0	14
Average	0	18	0	0	18

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.
[2] After the effective date of the part 63 PVC NESHAP (April 17, 2015), we estimate that 12 of the existing 26 sources will become subject to the part 63 rule, and will no longer be subject to this standard. Therefore, the number of sources that will be subject to these standards beginning in Year 2 of this ICR is (26 – 12) = 14.

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 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)+D
Quarterly Reports	18	4	N/A	72
Manual vent valve/relief valve discharge (MVV/RVD) Reports	18	3	N/A	54
			Total	126

The number of Total Annual Responses is 126.

The total annual labor costs are $743,615. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 7,603 hours at a cost of $743,615. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost –

NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $810,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,822 labor hours at a cost of $82,090. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease in the respondent and Agency burden as a result of the PVC NESHAP standard at 40 CFR part 63, subpart HHHHHHH. Beginning in April 17, 2015, 12 of the existing vinyl chloride plants will comply with the part 63 rule, and will no longer be subject to the part 61 NESHAP. Therefore, we expect a decrease in the number of respondents beginning in Year 2 of this ICR period. In addition, we have updated the number of existing sources from 28 in the previous ICR to 26 based on latest Agency estimates for this industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 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-2013-0328. 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-2013-0328 and OMB Control Number 2060-0071 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)

Reporting/Recordkeeping Requirements	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year (a)	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,$ (b)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	0	0	0	0	$0
B. Required activities								
Initial performance test [c]	60	1	60	0	0	0	0	$0
Repeat performance tests [d]	60	0.2	12	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write Report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Notification of emission testing	2	1	2	0	0	0	0	$0
Notification of test report	2	1	2	0	0	0	0	$0
Notification of physical or operational change [e]	2	1	2	0	0	0	0	$0
Application for waiver of testing [f]	8	1	8	0	0	0	0	$0
Application of equivalency [g]	40	1	40	0	0	0	0	$0
Initial report	24	1	24	0	0	0	0	$0
Quarterly report [h]	50	4	200	18	3,600	180	360	$404,964.

Reporting/Recordkeeping Requirements	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year (a)	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,$ (b)
								00
MVV/RVD report [i]	8	3	24	18	432	21.6	43.2	$48,595.68
Subtotal for Reporting Requirements					***4,636.8***			***$453,560***
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3D							
D. Develop record system	N/A							
E. Time to enter information								
Records of reactor parameters and emission [j]	0.25	365	91.25	18	1,643	82.13	164.25	$184,764.83
Records of leaks detected [k]	1	52	52	18	936	46.8	93.6	$105,290.64
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Recordkeeping Subtotal					***2,965.78***			***$290,055.47***
TOTAL ANNUAL BURDEN AND LABOR COST (rounded)					**7,603**			**$743,615**

Assumptions:

[a] We estimate there are currently 26 existing sources. Beginning in Year 2 of this ICR, only 14 sources will be subject to this part 61 standard. Therefore, the average number of sources over the 3-year period is 18. We have further assumed that there will be no new growth in the industry over the next three years.

[b] This ICR uses the following labor rates: $123.04 for managerial labor, $101.22 for technical labor, and $51.18 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, March 2013. The rates have been increased by 110 percent to account for overhead.

[c] We have assumed that it will take 60 hours to complete the performance tests.
[d] We have assumed that 20 percent of initial performance tests must be repeated due to failure.
[e] Assumed that there will be no physical or operational changes over the next three years.
[f] Assume it will take eight hours to prepare application for waiver of testing.
[g] Assume it will take 40 hours to prepare application for equivalency.
[h] We have assumed that it will take 50 hours to prepare the quarterly report.
[i] We have estimated that there will be three discharges of manual vent valve/relief valve discharge (MVV/RVD) per year.
[j] Assume that affected facilities will operate 365 days per year as required of all facilities that are subject to the rule.
[k] It is estimated that it will occur 52 times per year to enter records of leak detection.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year	(E) Technical person-hours per year (CxD)	(E) Management person-hours per year (Ex0.05)	(F) Clerical person-hours per year (Ex0.1)	(H) Cost [b] ($)
1. Initial performance test [c]	24	1	24	0	0	0	0	$0
2. Repeat performance test [d]	24	0.2	4.8	0	0	0	0	$0
3. Report review								
Notification of construction/reconstruction	1	1	1	0	0	0	0	$0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	$0
Notification of actual startup [b]	0.5	1	0.5	0	0	0	0	$0
Notification of emission testing	0.5	1	0.5	0	0	0	0	$0
Notification of physical or operational change [e]	0.5	1	0.5	0	0	0	0	$0
Emission test report [f]	24	1	24	0	0	0	0	$0
Application for waiver of testing [g]	24	1	24	0	0	0	0	$0
Application for equivalency	24	1	24	0	0	0	0	$0
Initial report	24	1	24	0	0	0	0	$0
Quarterly report [h]	4	4	16	18	288	14.4	28.8	$14,925.46
MVV/RVD report [i]	24	3	72	18	1,296	64.8	129.6	$67,164.55
TOTAL ANNUAL BURDEN (rounded)					**1,822**			**$82,090**

Assumptions:

[a] We estimate there are currently 26 existing sources. Beginning in Year 2 of this ICR, only 14 sources will be subject to this part 61 standard. Therefore, the average number of sources over the 3-year period is 18. We have further assumed that there will be no new growth in the industry over the next three years.

[b] This cost is based on the following hourly labor rates times 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 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 it will take twenty-four hours to complete the performance tests.

[d] We have assumed that 20 percent of initial performance tests must be repeated due to failure.

[e] Assume that there will be no physical or operational changes over the next three years.

[f] It is assumed that it will take twenty-four hours to review an emissions test report.

[g] Assume that it will take twenty-four hours to review application for waiver of test.

[h] We have assumed that it will take four hours to review the quarterly report.

[i] We have assumed that there will be three discharges of manual vent valve/relief valve discharge (MVV/RVD) per year.