

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal), EPA ICR Number 1974.07, OMB Control Number 2060-0488.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Cellulose Products Manufacturing were proposed on August 28, 2000, promulgated on June 11, 2002, and most-recently amended on February 27, 2014. The 2014 amendment promulgated technical and editorial corrections on emission testing provisions. These regulations apply to both the miscellaneous viscose processes source category and the cellulose ethers productions source category that are major sources of hazardous air pollutant (HAP), that emit or have the potential to emit any single HAP at a rate of 9.1 megagrams per year (10 tons per year) or more, or any combination of HAP at a rate of 23 megagrams per year (25 tons per year) or more. The miscellaneous viscose processes source category includes the cellulose food casing, rayon, cellophane, and cellulosic sponge industry sectors. The cellulose ethers production source category includes the carboxymethyl cellulose, hydroxyethyl cellulose, hydroxypropyl cellulose, hydroxypropyl methyl cellulose, and methyl cellulose industry sectors. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart UUUU.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 13 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. Of the thirteen existing sources: four are cellulose ether facilities; four are cellulosic sponge facilities; three are cellulose food casing facilities; one is a rayon operation; and one is a cellophane

operation.

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

In the United States, there are approximately 13 cellulose products manufacturing plants. None of these thirteen facilities are owned by either state, local, tribal, or the Federal government. They are owned and operated by privately-owned, for-profit businesses. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (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 Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from cellulose products manufacturing either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart UUUU.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

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

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart UUUU.

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 (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

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

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the standard has been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Association of Pharmaceutical Scientists, at (703) 243-2800, and the National Center for Biotechnology Information, at (888) 346-3656.

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

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made

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

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are cellulose products manufacturing. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 63, Subpart UUUU)	SIC Codes	NAICS Codes
All Other Plastics Product Manufacturing	3089	326199
Unlimited Plastics Profile Shape Manufacturing	3089	326121
Plastics Material and Resin Manufacturing	2821	325211
Cellulosic Organic Fiber Manufacturing	2823	325220
All Other Basic Inorganic Chemical Manufacturing	2819	325180
All Other Basic Organic Chemical Manufacturing	2869	325199

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU).

A source must make the following reports:

Notifications	
Initial notification	63.5575, 63.9(b)(1-5)
Notification of performance tests	63.5575, 3.7(b),

Notifications	
	63.9(e)
Notification of compliance status (including results of performance test, CEMS performance evaluation, or other initial compliance demonstration)	63.5575, 63.9(h)(1-6), 63.9(j), 63.10(d)(2), 63.10(e)(2)
Notification of equipment leaks	63.5575, 63.182(a)(1), 63.182(2)(b), 63.182(c)(1-3), 63.1039(a)
Notification of wastewater	63.5575, 63.146(a)(1-2), 63.146(b), 63.152(a)(1-3), 63.152(b)(1-5), 63.151

Reports	
Semiannual report of deviations/out-of-control operation	63.5580, 63.10(e)(3)
Semiannual report of startup, shutdown, and malfunction (SSM)	63.5580, 63.10(d)(5)
Semiannual report of equipment leaks	63.5580, 63.182(a)(3), 63.182(a)(6), 63.1039(b), 63.182(d)(2-4)
Semiannual report of wastewater	63.5580, 63.146(c-e), 63.152(a)(4-5), 63.152(c-e)
Semiannual report of changes in information	63.5580, 63.9(j)
Semiannual report of closed-vent system	63.5580, 63.148(j)(1)
Semiannual report of bypass lines	63.5580, 63.148(j)(2-3),
Semiannual report of heat exchanger systems	63.5580, 63.104(f)(2)(i-iv)
Semiannual report of storage vessel control device maintenance	66.5580

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)
Record retention	63.5590, 63.10(b)(1)
Records of documentation supporting initial notification and notification of compliance status	63.5585, 63.10(b)(2)(xiv)
Records of performance tests, CEMS performance evaluations, and other initial compliance demonstrations	63.5585, 63.10(b)(2)(viii)
Records of SSM plan	63.5515, 63.5585, 63.6(e)(3), 63.10(b)(2)(i-v)
Records of site-specific monitoring plan	63.5545, 63.5585, 63.8(d)(2)
Records of each CEMS	63.5585, 63.8(d)(3), 63.8(f)(6)(i), 63.10(c), 63.10(b)(2)(vi-xi)
Records of each CPMS	63.5585, 63.10(c) 63.10(b)(2)(vi-xi)
Records of closed-loop systems	63.5585
Records of nitrogen systems	63.5585
Records of material balances	63.5585
Records of calculations	63.5585
Records of extended cookout	63.5585
Records of equipment leaks	63.5585, 63.181, 63.1038
Records of wastewater	63.5585, 63.105, 63.147, 63.152(f-g)
Records of closed-vent systems	63.5585, 63.148(j)
Records of bypass lines	63.5585
Records of heat exchanger systems	63.5585, 63.104(f)(1)
Records of storage vessel control device maintenance	63.5585

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 20 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 control device.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C, 2D, 2F, or 2G; 3, 3A, or 3B; 4; 15; 18 or 320; 25; 25A; 22; and 624 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

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

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 (note the operating conditions under which compliance was achieved.) Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small

entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (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 12,088 hours (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	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “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 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)
Continuous parameter monitoring system	N/A	N/A	\$0	\$78	13	\$1,014

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 \$1,014. 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 \$1,014.

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 \$16,749.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal).

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

Based on our research for this ICR, approximately 13 existing respondents will be subject to the standards on average over the next three years. 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 13 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	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	13	0	0	13
2	0	13	0	0	13
3	0	13	0	0	13
Average	0	13	0	0	13

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 13.

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
Semiannual report of no deviation	10	2	N/A	20
Semiannual report of deviation	3	2	N/A	6
Semiannual report of SSM	13	2	N/A	26
Semiannual report on equipment leaks	4	2	N/A	8
Semiannual report on all others	13	2	N/A	26
			Total	86

The number of Total Annual Responses is 86.

The total annual labor costs are \$1,183,412. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 12,088 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 141 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,014. 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 368 labor hours at a cost of \$16,749. See below Table 2: Average Annual EPA Burden and Cost – NESHP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal).

6(f) Reasons for Change in Burden

There is no change in labor hours in this ICR compared to the previous ICR. However, there is a small adjustment decrease in the respondent and Agency labor costs to correct mathematical and rounding errors.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 141 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-2014-0080. 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-2014-0080 and OMB Control Number 2060-0488 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 Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal)

Burden item	(A) Person hours per occurrence ^e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	N/A							
B. Required activities	N/A							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write Report								
Semiannual report on no deviations ^c	8	2	16	10	160	8	16	\$18,014.08
Semiannual report on deviations ^d	16	2	32	3	96	4.8	9.6	\$10,808.45
Semiannual report of startup, shutdown, malfunction (SSM) ^e	8	2	16	13	208	10.4	20.8	\$23,418.30
Semiannual report on equipment leaks ^f	303	2	606	4	2,424	121.2	242.4	\$272,913.31
Semiannual report on wastewater	See 4E							
Semiannual report on all other reports ^g	8	2	16	13	208	10.4	20.8	\$23,418.30
Subtotal for Reporting Requirements					3,560.4			\$348,572.45
4. Recordkeeping requirements								
A. Read instructions	N/A							
B. Plan activities	N/A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
C. Implement Activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Records of SSM ^h	1.5	52	78	13	1,014	50.7	101.4	\$114,164.23
Records of continuous parameters monitoring system (CPMS) data								
Record continuous monitor parameters ⁱ	1	365	365	13	4,745	237.25	474.5	\$534,230.06
Compile data ^j	24	2	48	13	624	31.2	62.4	\$70,254.91
Enter and verify information for semiannual report ^j	16	2	32	13	416	20.8	41.6	\$46,836.61
Records of closed-loop systems ^k	2	2	4	1	4	0.2	0.4	\$450.35
Records of nitrogen systems ^l	2	2	4	9	36	1.8	3.6	\$4,053.17
Records of material balances ^m	8	2	16	9	144	7.2	14.4	\$16,212.67
Records of supporting calculations ⁿ	8	2	16	13	208	10.4	20.8	\$23,418.30
Records for extended cookout ^o	8	2	16	1	16	0.8	1.6	\$1,801.41
Records for equipment leaks	See 3E							
All other records	See 3E							
F. Time for refresher training of personnel ^p	16	1	16	13	208	10.4	20.8	\$23,418.30
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					8,527.3			\$834,840.02
TOTAL LABOR BURDEN AND COST (rounded)					12,088			\$1,183,412

Assumptions:

- ^a We have assumed that there are approximately thirteen sources subject to the standard which includes the following facilities: four cellulose ether; four cellulosic sponge; three cellulose food casing; one rayon; and one cellophane. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, Table 2. Civilian Workers, by Occupational and Industry groups. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c We have assumed that 80 percent of respondents will report no deviation.
- ^d We have assumed that 20 percent of respondents will report a deviation.
- ^e We have assumed that all of the existing sources will be required to submit an SSM report.
- ^f We have assumed that it will take each respondent 303 hours on a semiannual basis to write reports for 4 cellulose ether facilities subject to leak detection and repair (LDAR) requirements.
- ^g All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, will be reported twice per year.
- ^h We have assumed that SSM records will be recorded on a weekly basis.
- ⁱ We have assumed that it will take each respondent one hour to record information on a daily basis on process vent, storage tank and wastewater monitoring and inspections.
- ^j We have assumed that each respondent will enter and verify information for the semiannual report twice per year.
- ^k We have assumed that it will take respondent two hours to enter information on one cellulose ether facility with a closed-loop system.
- ^l We have assumed that it will take each of the nine respondent two hours to enter information on nine viscose process facilities with CS₂, unloading and storage operations.
- ^m We have assumed that it will take each of the nine respondent eight hours to enter information on nine viscose process facilities using material balances.
- ⁿ We have assumed that it will take eight hours for each respondent to enter information on supporting calculations twice per year.
- ^o We have assumed that it will take respondent eight hours to enter information on one cellulose ether facility that uses extended cookout.
- ^p We have assumed that it will take each of the thirteen respondent two days (16 hours) to provide refresher training to personnel.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (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 ^a	(E) Technical person- hours per year (Cx D)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Activity								
Initial performance test	N/A							
Repeat performance test	N/A							
Excess emissions enforcement activities	120	1	120	0	0	0	0	\$0.00
Review reports								
Review semiannual compliance report								
Report of no deviations ^c	2	2	4	10	40	2	4	\$2,093.60
Report of deviations ^d	8	2	16	3	48	2.4	4.8	\$2,512.32
Report of SSM ^e	2	2	4	13	52	2.6	5.2	\$2,721.68
Reports of equipment leaks ^f	8	2	16	4	64	3.2	6.4	\$3,349.76
Report on wastewater ^g	8	2	16	4	64	3.2	6.4	\$3,349.76
Report on all other reports ^h	2	2	4	13	52	2.6	5.2	\$2,721.68
TOTAL ANNUAL BURDEN AND COST (rounded)						368		\$16,749

Assumptions:

^a We have assumed that there are approximately thirteen sources that are subject to the standard which includes the following facilities: four cellulose ether; four cellulosic sponge; three cellulose food casing; one rayon; and one cellophane.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.90 for Managerial (GS-13, Step 5, \$39.31 x 1.6), \$46.67 for Technical (GS-12, Step 1, \$29.17 x 1.6) and \$25.25 Clerical (GS-6, Step 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

^c We have assumed that 80 percent of respondents will report no deviation.

^d We have assumed that 20 percent of respondents will report deviation.

^e We have assumed that all of the existing respondents will be required to submit an SSM report.

^f We have assumed that each of the four respondents for cellulose ether facilities will review their report on equipment leaks two times per year.

^g We have assumed that it will take each respondent eight hours to review reports of four cellulose ether facilities subject to LDAR and wastewater requirements.

^h We have assumed that all other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, will be reported twice a year.