

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal), EPA ICR Number 2454.02, OMB Control Number 2060-0684.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride (PVC) and Copolymers Production Area Sources were originally promulgated on January 23, 2007. The original rule was based on GACT and required area sources to meet the requirements imposed by the NESHAP for PVC Production, in 40 CFR, part 61, subpart F, referred to as the part 61 NESHAP. The part 61 NESHAP requirements address only vinyl chloride emissions. On May 20, 2011, the EPA issued a proposal to update the PVC Area Source NESHAP in accordance with the Clean Air Act (CAA) section 112. The updated Subpart DDDDDD is promulgated on April 17, 2012, and applies to new and existing PVC and copolymer production facilities that are an area source of hazardous air pollutants (HAP).

This ICR includes burden estimates for area sources only. Major sources are regulated under NESHAP Subpart HHHHHHH and their burdens are included in a separate ICR (EPA ICR Number 2432.02). 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 DDDDDD.

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 United States Environmental Protection Agency (EPA) regional office.

All of the PVC and copolymer area source facilities are owned by the private sector. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63,

Subpart DDDDDDD) (Renewal). The “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (Renewal).

Over the next three years, approximately 3 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

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

## **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 PVC production area source facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart DDDDDDD.

### **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. 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 standard. Continuous emission monitors are used to ensure compliance with the standard 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 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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is 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. Nonduplication, Consultations, and Other Collection Criteria**

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

#### **3(a) Nonduplication**

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, no duplication exists.

#### **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 has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO 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. In developing this ICR, we contacted both the Vinyl Institute (VI) at (202) 765-2200 and the Occidental Chemical Corporation (OxyVinyls Deer Park, TX PVC facility) at (972) 404-3800. The Vinyl Institute provided substantial comments on the respondent universe and specific burden hours and costs associated with the reporting and recordkeeping requirements. We have updated this ICR to incorporate the comments 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 (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 PVC production area source facilities. 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 the NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD).

A source must make the following reports:

<b>Notifications / Reports</b>	
Submit an initial notification	63.9(b)
Submit a notification of compliance status	63.11142(f)(18)
Submit a notification of performance test	63.9(e)
Submit a compliance report	63.11142(f)(18)
Submit a notification of inspection	63.11142(f)(18)
Submit a batch pre-compliance report	63.11142(f)(18)

A source must keep the following records:

<b>Recordkeeping</b>	
A copy of each notification and report submitted to comply with this subpart	63.11142(f)(19)
Records of storage vessels	63.11142(f)(19)
Records of equipment leaks	63.11142(f)(19)
Records of heat exchanger systems	63.11142(f)(19)

<b>Recordkeeping</b>	
Records of process vents	63.11142(f)(19)
Records of closed vent systems	63.11142(f)(9) and 63.11142(f)(19)
Records of resin strippers	63.11142(f)(19)
Records of process wastewater	63.11142(f)(19)
Keep records for five years	63.11142(f)(19)

### 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.

#### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
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 or 320; 25A or 18; 308; 316; 204 and 204A – 204F 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.

<b>Respondent Activities</b>
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.

<b>Agency Activities</b>
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 Integrated Compliance Information System (ICIS) and ECHO.

### **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 reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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**

There are no small entities (i.e., small businesses) affected by this regulation.

The PVC NESHAP does not contain any provisions reserved exclusively for the benefit of small entities; however, there are provisions that reduce the impact on all regulated entities, which would include any small entities. Reporting is annual and operating parameter monitoring is required instead of CEMS.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (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 69,200 (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:

Managerial	\$129.93 (\$61.87 + 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)



These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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, which includes monitoring system installation, performance testing, resin stripper testing, and wastewater testing. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondent s	(D) Total Capital/Start up Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondent s with O&M	(G) Total O&M, (E X F)
<b>Continuous Parameter Monitoring</b>						
PRD Electronic Monitor <sup>1</sup>	\$375,000	0	\$0	\$31,772	3	\$95,316
VC Ambient Monitoring <sup>2</sup>	NA	0	\$0	\$164,250	3	\$492,750
Gasholder <sup>3</sup>	\$5,000	0	\$0	NA	3	\$0
<b>Periodic Testing</b>						
Process Vent Testing	\$43,198	0	\$0	\$8,640	3	\$25,920
Resin Sampling and Monitoring <sup>4</sup>	\$1,803	0	\$0	\$7,212	3	\$21,636
Resin: Non-VC TOHAP testing <sup>5</sup>	\$1,950	0	\$0	\$23,400	3	\$70,200
Wastewater Testing <sup>6</sup>	\$491	0	\$0	\$5,892	3	\$17,676
Wastewater Testing: Non-VC TOHAP testing	\$650	0	\$0	\$7,800	3	\$23,400
Uncontrolled Wastewater testing	\$0	0	\$0	\$491	3	\$1,473
Uncontrolled Wastewater testing: Non-VC TOHAP testing <sup>7</sup>	\$3,250	0	\$0	\$3,250	3	\$9,750
Equipment Leak Testing	\$177,360	0	\$0	\$16,105	3	\$48,315
<b>Total (rounded)</b>			<b>\$0</b>			<b>\$806,000</b>

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

<sup>1</sup> Per VI's comments, the capital cost of the PRD monitor is \$15,000 per device, and it is assumed that 25 devices per facility require indicators.

<sup>2</sup> Per VI's comments, there are 73 GC monitors in the industry with an annual cost of \$45,000 per monitor for vinyl chloride (for 3 area and 17 major source facilities). The average cost per facility is therefore \$164,250.

<sup>3</sup> Per VI's comments, estimated installation cost for gasholder is \$5,000. Note there are only 15 gasholders in the industry across both major and area source facilities.

<sup>4</sup> Monthly testing (\$601 x 12 months = \$7,212 per year)

<sup>5</sup> Per VI's comments, the costs of Non-VC TOHAP testing is \$650 per sample, and three samples per facility.

<sup>6</sup> Monthly testing (\$491 x 12 months = \$5,892 per year)

<sup>7</sup> Per VI's comments, the costs of Non-VC TOHAP testing is \$650 per sample, and five samples per facility.

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 \$806,000. 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 \$806,000.

### **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 \$7,170.

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), 2015 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 Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately three existing respondents will be subject to the standard. 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 three per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	3	0	0	3
2	0	3	0	0	3
3	0	3	0	0	3
Average	0	3	0	0	3

<sup>1</sup> 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 three.

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

<b>Total Annual Responses</b>				
(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
1) Initial Notification	0	1	0	0
2) Batch pre-compliance report	0	1	0	0
3) Notification of performance test with test plan	0	1	0	0
4) Notification of compliance status	0	1	0	0
5) Compliance report	3	2	0	6
6) Notice of inspection	3	1	0	3
			Total	9

The number of Total Annual Responses is 9.

The total annual labor costs are \$6,960,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride

and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (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 69,200. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 7,689 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$806,000. 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 158 labor hours at a cost of \$7,170. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is an adjustment increase in the estimated burden as currently identified in the OMB Inventory of Approved Burdens. In consulting with the Vinyl Institute during the renewal of this ICR, EPA received comprehensive comments on the burden associated with specific reporting and recordkeeping requirements, including, but not limited to, performance test, monitor installation, resin and wastewater sampling, equipment leak and process vent monitoring. We have updated the burden items to more accurately reflect the costs incurred by

the industry. The update results in a substantial increase in the respondent labor hours, labor costs, and capital/O&M costs. There is also a small increase in the number of responses as we have updated the number of subject area sources from two to three based on data provided by the Vinyl Institute.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7,689 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-2014-0104. 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), EPA 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) 566-1927. 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-2014-0104 and OMB Control Number 2060-0684 in any correspondence.

### **Part B of the Supporting Statement**

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



a) Initial capital costs (PRD Electronic Monitor) <sup>a,i</sup>	524	1	524	0	0	0	0	\$0
b) Annualized capital and O&M costs (PRD Electronic Monitor) <sup>i</sup>	24	1	24	0.81	19.44	0.97	1.94	\$2,248.15
5) Other requirements								
a) equipment openings, initial measurement <sup>k</sup>	1.5	1	1.5	0	0	0	0	\$0
b) equipment openings, daily measurement <sup>k</sup>	1.5	350	525	3	1,575	78.75	157.5	\$182,141.66
c) gasholders <sup>k</sup>	24	1	24	0	0	0	0	\$0
d) storage vessels <sup>k</sup>	40	1	40	0	0	0	0	\$0
e) bypasses, initial requirement <sup>k</sup>	40	1	40	0	0	0	0	\$0
f) bypasses, ongoing inspection <sup>k</sup>	1	12	12	3	36	1.8	4	\$4,163.24
C. Create Information	Incl. in 3.B							
D. Gather Information	Incl. in 3.E							
E. Report Preparation								
1) Initial Notification <sup>a,b</sup>	5	1	5	0	0	0	0	\$0
2) Batch pre-compliance report <sup>a,b</sup>	5	1	5	0	0	0	0	\$0
3) Notification of performance test with test plan <sup>a,b</sup>	10	1	10	0	0	0	0	\$0
4) Notification of compliance status <sup>a,b</sup>	20	1	20	0	0	0	0	\$0
5) Compliance report <sup>b</sup>	40	2	80	3	240	12	24	\$27,754.92
6) Notice of inspection <sup>b</sup>	5	1	5	3	15	0.75	1.5	\$1,734.68
<b>Reporting Subtotal</b>						<b>68,874</b>		<b>\$6,926,059.88</b>
4. Recordkeeping Requirements								
A. Familiarize with Rule Requirements	Incl. in 3.A							
B. Implement Activities	N/A							
C. Develop Record System	N/A							
D. Record Information								
1) Records of process vent requirements <sup>b</sup>	10	1	10	3	30	1.5	3	\$3,469.37
2) Records of resin stripper requirements <sup>b</sup>	15	1	15	3	45	2.25	4.5	\$5,204.05
3) Records wastewater requirements <sup>b</sup>	15	1	15	3	45	2.25	4.5	\$5,204.05
4) Records of storage vessel requirements <sup>b</sup>	10	1	10	3	30	1.5	3	\$3,469.37
5) Records of equipment leak requirements <sup>b</sup>	25	1	25	3	75	3.75	7.5	\$8,673.41
6) Records of heat exchanger requirements <sup>b</sup>	10	1	10	3	30	1.5	3	\$3,469.37
7) Records of other emission sources requirements	10	1	10	3	30	1.5	3	\$3,469.37
E. Personnel Training	Incl. in 3.B							
F. Time for Audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>328</b>		<b>\$32,958.97</b>
<b>TOTAL ANNUAL BURDEN AND COSTS</b>						69,201.8		\$6,959,018.85
<b>(rounded)</b>						<b>69,200</b>		<b>\$6,960,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):</b>								\$806,000
<b>TOTAL COST:</b>								<b>\$7,770,000</b>



**Note:** Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

FOOTNOTES

- <sup>a</sup> One-time only costs.
- <sup>b</sup> Cost incurred by a facility regardless of the number of affected units at the plant.
- <sup>c</sup> 3 area sources in affected source category
- <sup>d</sup> Per the Vinyl Institute (VI), it is assumed that performance testing for process vents will take 120 hours per occurrence initially. The initial compliance and operating procedure development for continuous compliance and will take 8 hours. The daily monitoring of parameters will take 5 min per record with 112 records a day across 33 devices in the industry. There are 3 area source and 15 major source subject to this requirement. Therefore, the continuous/daily monitoring will take on avg 17.1 hr per facility per day over 350 day/yr.
- <sup>e</sup> Per VI, it is assumed that performance testing for process vents will take 4 hours per sample for 9 samples per facility, initially and daily (350 days per year). See continuous monthly sampling & testing of Non-VC TOHAP in O&M section.
- <sup>f</sup> Estimated 1 uncontrolled stream and 1 wastewater stripper per facility. 1 wastewater stripper outlet is expected to require monthly testing; 5 uncontrolled stream will require annual testing (per facility). Per VI, it will take 4 hours per sample for 2 samples per stream.
- <sup>g</sup> Per VI, it is assumed that performance testing on heat exchangers will take 4 hours per sample for 2 samples per facility, initially and monthly.
- <sup>h</sup> For Equipment leaks, VI estimates approx 10,000 components per facility and 5 minutes per component, plus additional time calibration of analytical device for a total of 850 hr per facility. For continuous monitoring, VI assumes 1 hr is required per component for leak repair, if detected. It was assumed that overall continuous compliance of leak monitoring will take 5% of the time with initial monitoring per month.
- <sup>i</sup> Per VI, the initial performance testing for pressure relief devices (PRD), would take 524 hours per facility. Periodically, corrective action for discharge from a PRD would take 24 hours. It is estimated that 27% of the respondents would experience discharge from a PRD each year.  
It will take 8 employees 40 hours per person to read and understand the rule requirements for new sources. For existing sources, we assume it will take 8 employees 1
- <sup>j</sup> hour per person.
- <sup>k</sup> We have included this burden item per comment from VI.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal)**

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	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.10)	(H) EPA Cost Per Year <sup>a,b</sup>
1. Applications	not applicable							
2. Familiarize with Rule Requirements	16	0	0	0	0	0	0	\$0
3. Required Activities								
A. Observe initial performance tests <sup>b</sup>	48	0	0	0	0	0	0	\$0
B. Excess emissions -- Enforcement Activities <sup>d</sup>	24	0	0	0	0	0	0	\$0
C. Create Information	not applicable							
D. Gather Information	not applicable							
E. Report Reviews								
1) Review initial notification	3	0	0	0	0	0	0	\$0
2) Review batch pre-compliance report	5	0	0	0	0	0	0	\$0
3) Review notification of performance test	10	0	0	0	0	0	0	\$0
4) Review notification of compliance status	40	0	0	0	0	0	0	\$0
5) Review compliance report	20	2	40	3	120	6	12	\$6,281
6) Review notice of inspection	3	1	3	3	9	0.45	0.9	\$471
F. Prepare annual summary report <sup>c</sup>	8	1	8	1	8	0.4	0.8	\$419
<b>TOTAL (rounded)</b>						<b>158</b>		<b>\$7,170</b>

**Note:** Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

FOOTNOTES

<sup>a</sup> Figures may not add exactly due to rounding.

Assumes EPA personnel attend 20 percent of the initial process vent stack

<sup>b</sup> tests.

<sup>c</sup> Using four hours per state to write annual summary report.

<sup>d</sup> Assume no emissions exceedances.