

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal), EPA ICR Number 1807.08, OMB Control Number 2060-0370.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart MMM were proposed on November 10, 1997 (62 FR 60579) and promulgated on June 23, 1999 (64 FR 33549). The rule was recently amended on March 27, 2014 (79 FR 17339). The amendment added provisions requiring respondents to monitor pressure relief devices (PRDs). In the event of any releases of hazardous air pollutants (HAPs) from PRDs, respondents must estimate the quantity released and include this information in the next periodic report. The amendment also added provisions for respondents wishing to assert an affirmative defense to avoid civil penalties for exceedances caused by malfunctions. This standard applies to all owners and operators of new and existing facilities engaged in the production of pesticide active ingredients (PAIs) that emit HAPs. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart MMM.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. The owners/operators 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 the 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.

Over the next three years, an average of 18 respondents per year will be subject to the standard. No additional respondents will become subject over the next three years. All are privately owned and operated by for-profit businesses.

The Office of Management and Budget (OMB) approved the currently active ICR with the following “Terms of Clearance”:

Terms of the previous clearance remain in effect. OMB notes that this submission was based on a final rule and that EPA was not requesting an extension to the current expiration date.

The term “Affected Public” applies to owners and operators of PAI production operations, and may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal). The burden to the “Federal Government” 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 Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (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 PAI production operations 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 MMM.

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, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required quarterly and 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 MMM.

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. The Agency received one public comment in the docket; the commenter opposed any new regulation or rule changes to the NESHAP. This ICR renewal will not result in any regulatory changes.

3(c) Consultations

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 the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data.

Consultations with industry representatives (i.e., respondents) also were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, we contacted both the Society of Chemical Manufacturers and Affiliates (SOCMA) at (202) 721-4100 and CropLife America at (202) 296-1585.

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 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 owners and operators of PAI production operations. The North American Industrial Classification System (NAICS) codes and corresponding United States Standard Industrial Classification (SIC) codes are listed below.

Standard (40 CFR Part 63, Subpart MMM)	SIC Codes	NAICS Codes
Petrochemical Manufacturing	2869	325110
All Other Basic Inorganic Chemical Manufacturing	2869	325188
Cyclic Crude and Intermediate Manufacturing	2869	325192
Ethyl Alcohol Manufacturing	2869	325193
All Other Basic Organic Chemical Manufacturing	2869	325199
Industrial Gas Manufacturing	2869	325120
All Other Miscellaneous Chemical Production and Preparation Manufacturing	2869	325998
Pesticide and Other Agricultural Chemical Manufacturing	2879	325320

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM).

A source must make the following notifications:

Notifications	
Initial notification	63.9 (b and d) and 63.1368(b)
Notification and application of construction and reconstruction	63.5(d) and 63.1368(c)

Notifications	
Notification of CMS performance evaluation	63.8(e)(2) and 63.1368(d)
Pre-compliance report	63.1368(e)
Notification of compliance status report	63.9(h), 63.1363(h)(2), and 63.1368(f)
Periodic reports of excess emissions and noncompliance	63.10(e)(3), 63.1363(h)(3), and 63.1368(g)
Notification of process change	63.1368(h)
Notification of performance test and test plan	63.7(c) and 63.1368(m)
Request for extension of compliance	63.1364(a)(2) and 63.1368(n)
Request for approval to use alternative monitoring parameters	63.8(f), 63.1366(b)(4), and 63.1368(e)(1)

A source must make the following reports:

Reports	
Startup, shutdown, and malfunction reports	63.1368(i)
Equipment leaks reports	63.1363(h) and 63.1368(j)
Emissions averaging reports	63.1368(k)
Heat exchange system reports	63.1368(l)
PRD requirements in periodic reports	63.1363(h)(3)(iv)
Reports and notifications of malfunctions that result in an exceedance of the standard for the purpose of affirmative defense	63.1360(k)

A source must keep the following records:

Recordkeeping	
Retain copies of all required records, notifications, reports, applicability determinations, malfunctions, and CMS monitoring data for at least five years	63.1367(a)
Control device operating parameters to monitor and record	63.1366(b) and 63.1367(b)(1)
Monitoring and records for CMS	63.10(c), 63.1367(a)(4),

Recordkeeping	
	and 63.1367(b)(3)
Monitoring and records for uncontrolled emissions	63.1366(c) and 63.1367(b)(4 and 5)
Monitor and records for equipment leak detection and repair	63.10(b)(1), 63.1363(g), 63.1366(d), 63.1367(c), and 63.1368(j)
Monitoring and records for heat exchanger systems	63.104(f)(1)(i-iv), 63.1362(f), 63.1366(e), and 63.1367(e)
Monitoring and records for alternative standard	63.1366(b)(5), 63.1366(f), and 63.1367(b)(2)
Monitoring and records for emission averaging	63.1366(g) and 63.1367(d)
Records for process operating parameters and maintenance	63.1367(b)(6-11)
Records for vapor collection systems and closed-vent systems	63.1367(f)
Records of primary use as a PAI process	63.1367(g)

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

Respondent Activities
Familiarization with the regulatory requirements.
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.

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

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

5(a) Agency Activities

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

Agency Activities
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

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The periodic 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 development of the regulation. Due to the type of monitoring equipment to be used, 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 in below Table 1: Annual Respondent Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (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 12,031 hours. 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 (O&M) 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)
PRD Electronic Indicators	\$11,632	18	\$209,376	\$1,474	18	\$26,532
Performance Tests	\$52,200	0	\$0	\$1,325	0	\$0
Process Vents CMS	\$15,920	0	\$0	\$0	0	\$0
Wastewater CMS	\$10,690	0	\$0	\$0	0	\$0
Total			\$209,376			\$26,532

The total capital/startup costs for this ICR are \$209,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$27,000. 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 \$236,000.

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 \$9,600.

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 Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (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 18 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 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	(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	18	0	0	18
2	0	18	0	0	18

Number of Respondents					
3	0	18	0	0	18
Average	0	18	0	0	18

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 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
Notification of construction/ reconstruction	0	1	0	0
Notification of applicability	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of process changes	2	1	0	2
Pre-compliance plan	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of initial CMS performance evaluation	0	1	0	0
CMS evaluation with performance test	0	1	0	0
CMS evaluation without performance test	0	1	0	0
Semiannual report	16	2	0	32
Quarterly report	2	4	0	8
Emissions averaging plan	2	1	0	2
			Total	44

The number of Total Annual Responses is 44.

The total annual labor costs are \$1,180,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (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(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 12,000. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (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 270 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$235,908. 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 212 labor hours at a cost of \$9,600. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment decrease in the number of responses because this ICR removes leak detection and repair (LDAR) reports. The regulation requires subject sources to include LDAR information in periodic (i.e. semiannual or quarterly) reports. LDAR is not separately

reported to EPA; therefore, no additional responses are associated with this activity.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 270 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-2014-0062. 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-2014-0062 and OMB Control Number 2060-0370 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 Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal)

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions	2	1	2	0	0	0	0	0
B. Required activities								
Performance evaluation test (CMS certification)	13	6	78	0	0	0	0	0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	0
Notification of applicability ^c	2	1	2	0	0	0	0	0
Notification of anticipated startup ^c	2	1	2	0	0	0	0	0
Notification of actual startup ^c	2	1	2	0	0	0	0	0
Notification of process changes ^d	8	1	8	2	16	0.8	1.6	1,801.41
Pre-compliance plan ^c	40	1	40	0	0	0	0	0
Notification of initial performance test ^c	2	1	2	0	0	0	0	0
Notification of initial CMS performance evaluation ^c	2	1	2	0	0	0	0	0

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
CMS evaluation with performance test ^{c,e}	80	1	80	0	0	0	0	0
CMS evaluation without performance test ^{c,f}	120	1	120	0	0	0	0	0
Periodic reporting								
Semiannual report ^g	8	2	16	16	256	12.8	25.6	28,822.53
Quarterly report ^h	24	4	96	2	192	9.6	19.2	21,616.9
Emissions averaging plan ⁱ	40	1	40	2	80	4	8	9,007
PRD reporting	5.5	2	11	18	198	9.9	19.8	22,292.42
LDAR reporting	94	2	188	18	3,384	169.2	338.4	380,997.79
Affirmative defense ^j	0			0	0	0	0	0
Subtotal for Reporting Requirements					4,745			464,538
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system ^c	40	1	40	0	0	0	0	0
E. Develop startup, shutdown, and malfunction plan ^{c,k}	100	1	100	0	0	0	0	0
F. Develop QA/QC plan for CMS ^c	40	1	40	0	0	0	0	0
G. Time to enter information								
Records of startups, shutdowns, malfunctions ^c	1.5	52	78	0	0	0	0	0

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
Records of CMS data								
Record continuously monitored parameters ¹	1	320	320	18	5,760	288	576	648,506.88
Enter/verify information for periodic report	16	2	32	18	576	28.8	57.6	64,850.69
H. CMS calibration ^c	48	1	48	0	0	0	0	0
I. Train personnel ^c	40	1	40	0	0	0	0	0
J. Audits	N/A							
Subtotal for Recordkeeping Requirements						7,286		713,358
TOTAL ANNUAL BURDEN AND COST (ROUNDED)						12,031		1,177,896

^a On average, EPA estimates 18 existing sources will be subject to the NESHAP. No new sources will become subject to the standard over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$101.05 (technical), \$128.02 (managerial), and \$51.37 (clerical). 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." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c Applies to new or reconstructed sources only.

^d EPA assumes 10 percent of existing facilities ($18 \times 0.1 = 2$, after rounding) will implement process changes.

^e EPA assumes 90 percent of new sources will comply by conducting performance testing.

^f EPA assumes 10 percent of new sources will comply by submitting engineering calculations, designing calculations, and CMS performance evaluation results.

^g EPA assumes 90 percent of sources ($18 \times 0.9 = 16$, after rounding) will have no exceedances and periods of noncompliance; therefore, they will submit periodic reports on a semiannual basis.

^h EPA assumes 10 percent of sources ($18 \times 0.1 = 2$, after rounding) will have exceedances and periods of noncompliance; therefore, they will submit periodic reports on a quarterly basis.

ⁱ EPA assumes 10 percent of existing sources will comply with emissions averaging requirements. New sources are not allowed to use emissions averaging.

^j EPA assumes 0 affirmative defense reports.

^k EPA assumes new respondents will require 80 hours to draft the startup, shutdown, and malfunction plan and another 20 to review/revise the plan (100 hours total).

¹ EPA assumes it will take 1 hour, 320 times per year, to record continuously monitored parameter data.

Note: Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal)

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
Initial performance test	40	1	40	0	0	0	0	0
Repeat performance test ^c	40	1	40	0	0	0	0	0
Performance evaluation test (CMS certification) ^d	2	6	12	0	0	0	0	0
Report review								
Notification of construction/reconstruction	2	1	2	0	0	0	0	0
Notification of applicability	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 process changes ^e	8	1	8	2	16	0.8	1.6	837.44
Pre-compliance plan	4	1	4	0	0	0	0	0
Notification of initial performance test	2	1	2	0	0	0	0	0
Notification of initial CMS performance evaluation	2	1	2	0	0	0	0	0
CMS evaluation with performance test ^f	40	1	40	0	0	0	0	0
CMS evaluation without performance test ^g	40	1	40	0	0	0	0	0
Semiannual report ^h	2	2	4	16	64	3.2	6.4	3,349.76
Quarterly report ⁱ	8	4	32	2	64	3.2	6.4	3,349.76
Emissions averaging plan ^j	20	1	20	2	40	2	4	2,093.6
TOTAL ANNUAL BURDEN AND COST (ROUNDED)					212			9,631

^a On average, EPA estimates 18 existing sources will be subject to the NESHAP. No new sources will become subject to the standard over the three-year period of this ICR.

- ^b This ICR uses the following labor rates: \$46.67 (technical), \$62.90 (managerial), and \$25.25 (clerical). 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.
 - ^c EPA assumes five percent of new sources will repeat performance testing.
 - ^d EPA assumes Agency personnel will attend ten percent of evaluation tests.
 - ^e EPA assumes 10 percent of existing facilities ($18 \times 0.1 = 2$, after rounding) will implement process changes.
 - ^f EPA assumes 90 percent of new sources will comply by conducting performance testing.
 - ^g EPA assumes 10 percent of new sources will comply by submitting engineering calculations, designing calculations, and CMS performance evaluation results.
 - ^h EPA assumes 90 percent of sources ($18 \times 0.9 = 16$, after rounding) will have no exceedances and periods of noncompliance; therefore, they will submit periodic reports on a semiannual basis.
 - ⁱ EPA assumes 10 percent of sources ($18 \times 0.1 = 2$, after rounding) will have exceedances and periods of noncompliance; therefore, they will submit periodic reports on a quarterly basis.
 - ^j EPA assumes 10 percent of existing sources will comply with emissions averaging requirements. New sources are not allowed to use emissions averaging.
- Note: Figures may not add exactly due to rounding.