SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal), EPA ICR Number 1871.09 OMB Control Number 2060-0420.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at regulatory citation were proposed on October 14, 2998, and promulgated on June 29, 1999 and amended on November 22, 1999, November 2, 2001, June 7, 2002, July 12, 2002, and October 8, 2014. These regulations apply to new and existing facilities of the following four categories: Polycarbonates (PC) Production, Acrylic and Modacrylic Fibers (AMF) Production, Acetal Resins (AR) Production, and Hydrogen Fluoride (HF) Production. 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 YY.

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.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

The PC industry consists of facilities that produce polycarbonates, a process that involves a polymerization reaction using either a solution or suspension process in either a batch or continuous mode. All production of polycarbonates in the United States is currently based on the

polymerization reaction of bisphenols with phosgene in the presence of catalysts, solvents (mainly methylene chloride) and other additives.

The AMF industry consists of facilities that produce acrylic and modacrylic fibers, which are manufactured synthetic fibers in which the fiber-forming substance is any long-chain synthetic polymer containing acrylonitrile units.

The AR industry consists of facilities that produce homopolymers and/or copolymers of alternating oxymethylene units. Acetal resins are also known as polyoxymethylenes, polyacetals, and aldehyde resins.

The HF industry consists of facilities that produce and recover hydrogen fluoride by reacting calcium fluoride with sulfuric acid. In this subpart, hydrogen fluoride production is not a process that produces gaseous hydrogen fluoride for direct reaction with hydrated aluminum to form aluminum fluoride (i.e., the hydrogen fluoride is not recovered as an intermediate or final product prior to reacting with the hydrated aluminum).

Over the next three years, approximately 3 PC production facilities, 1 AMF production facility, 2 AR production facilities and 1 HF production facility 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.

The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal). The burden to the Federal Government is attributed entirely to work performed by federal employees or government contractors and can be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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, hazardous air pollutant (HAP) emissions from PC, AMF, AR and HF source categories 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 YY.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. 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.

The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

3. Nonduplication, Consultations, and Other Collection Criteria

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

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 association 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 DuPont at (302)773-0900 and General Electric at (864) 254-2966.

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 (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 PC, AMF, AR, and HF production facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes, are listed below for the source categories.

Standard (40 CFR Part 63, Subpart YY)	SIC Codes	NAICS Codes
Polycarbonates (PC) Production (Synthetic Rubber Manufacturing)	2822	325212

Standard (40 CFR Part 63, Subpart YY)	SIC Codes	NAICS Codes
Acrylic and Modacrylic Fibers (AMF) Production (Organic Fibers - Noncellulosic, and Artificial and Synthetic Fibers and Flaments Manufacturing)	2824	325220
Acetal Resins (AR) Production (Plastic Materials and Resins)	2821	325211
Hydrogen Fluoride (HF) Production (Industrial Inorganic Chemicals, and Other Basic Inorganic Chemical Manufacturing)	2819	325180

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal).

A source must make the following reports:

Notifications	
Application for approval of construction/reconstruction	63.5(d), 63.1110(a)
Notification of anticipated date of initial startup.	63.5
Notification of actual date of initial startup (if not submitted under 63.5)	63.1110(a) 63.1110(b) 63.1066(a)
Notification of initial applicability	63.1110(a), 63.1110(c)
Notification of compliance status	63.999(b), 63.1110(d) 63.1110(a), 63.1039(a),
Notification of performance test and performance evaluation results	63.999(a), , 63.1110(d),

Notifications	
	63.1110(a), 63.987(c), 63.988(b), 63.997(a)
Rescheduled initial performance test	63.999(a)(1)(i)
Develop startup, shutdown, malfunction plan and periodic reports	63.10(d)(5)(i), 63.1110(a), 63.1111
Operating parameter value and rationale selection	63.1110(a), 63.1111
Excess emissions and continuous parameter monitoring systems (CPMS) performance reports	63.1110(a)

Reports	
Periodic reports (Semiannual or according to the schedule for Title V) with information on excess emissions and on the implementation of leak detection and repair standard provisions	63.999(c), 63.1110(e), 63.1108(a), 63.1109, 63.1030(b) 63.1066(b)
Startup, shutdown and malfunction reports (for AR and HF only)	63.1110(a), 63.1111

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, malfunctions periods when excess emissions have occurred during the reporting period (AR and HF only)	63.1109(a), 63.998(d)
Records of verification of DOT tank certification or Method 27 of appendix A to 40 CFR Part 60 testing (HF Only)	63.1105(i)
Records of maintenance	63.1109(a)
Maintain records of performance test and performance evaluation results	63.1109(a), 63.998(a)

Recordkeeping	
Maintain records of all reports and notifications	63.63.998(a), 63.1109(a)
Maintain record of applicability	63.998(a), 63.1109(a)
Records of CPMS operation adjustments, calibration checks, and maintenance	63.998(c), 63.1109(a)
Records of nonflare control and recovery device regulated source monitoring	63.998(c)
Records of closed vent systems	63.998(d)
Records of storage vessel and transfer racks	63.998(d)
Records of equipment leaks	63.998(d)
Records of monitored parameters out of range	63.998(d)
Records of malfunctioning or inoperative CPMS	63.998(c)
Records of implementation of leak detection and repair (LDAR) standards provision	63.1107, 63.998(d), 63.1038(b)-(c)
Records of vessel dimensions and capacity	63.1065(a)
Records of floating roof inspection results for storage vessels (tanks)	63.1065(b)
Records of floating roof landing	63.1065(c)
Records are required to be retained for five years	

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.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for CPMS
Perform initial performance test, and repeat performance tests if necessary.
Write the notifications and reports listed above.

Respondent Activities
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, 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. 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

All 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.

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 Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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 3,240 (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	$117.20 ($55.81 + 110%)
Technical	$55.25 ($26.31 + 110%)
Clerical	$38.62 ($18.39 + 110%)

These labor rates are based on the May 2013 National Occupational Employment and Wage Estimates for the United States, occupational codes 51-8091 for chemical plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical).

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

The type of industry costs associated with the information collection activities in the subject standard are 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 and Operation and Maintenance (O&M) Costs						
(A) Source Category and Cost Type	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Costs for One Respondent	(F) Number of Respondents	(G) Total Annual Cost (E X F)
PC (O&M)	$0	0	$0	$1,505	3	$4,515
PC (PRD)	$12,649	3	$37,947	$1,804	3	$5,412
PC (LDAR)	$3,899	3	$11,697	$541	3	$1,623
AMF (O&M)	$0	0	$0	$1,505	1	$1,505
AMF (PRD)	$37,063	1	$37,063	$5,277	1	$5,277
AMF (LDAR)	$1,428	1	$1,428	$223	1	$223
AR[1,2]	$0	0	$0	$135	2	$270
				$7,500	2	$15,000

Capital/Startup and Operation and Maintenance (O&M) Costs						
(A) Source Category and Cost Type	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Costs for One Respondent	(F) Number of Respondents	(G) Total Annual Cost (E X F)
HF[1,3]	$0	0	$0	$135	1	$135
				$4,420	1	$4,420
Total (rounded)			$88,100			$38,400

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.
[1]We have assumed that each source will respond 5 times per year to comply with the rule at a total cost of $135 per source to cover costs. This estimate is based on the assumption that it takes 0.5 hours to conduct these tasks at a clerical labor rate of $38.62 per hour for a total labor cost of $19.31 per response. First-class postage is estimated at $7.63 per response.
[2]Based on our consultation with affected entities, we estimate that $7,500 per year are required on LDAR monitoring for the AR MACT.
[3]Based on our consultation with affected entities, we estimate that 80 technical hours per year are required to maintain and calibrate the scrubber, monitor, and related instruments for the HF MACT unit ($55.25/hr x 80 hr = $4,420).

The total capital/startup costs for this ICR are $88,100. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $38,400. 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 $127,000. These are recordkeeping costs.

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 $5,230.

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 Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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 7 existing respondents will be subject to the standard (3 in the PC source category, 1 in the AMF source category, 1 in the HF source category and 2 in the AR source category). 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 7 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	7	0	0	7
2	0	7	0	0	7
3	0	7	0	0	7
Average	0	7	0	0	7

[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 7.

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
Initial requirements for PC Production	3	1	N/A	3
Initial requirements for AMF Production	1	1	N/A	1
Initial requirements for AR Production	0	1	N/A	0
Initial requirements for HF Production	0	1	N/A	0
SSM reports for AR Production	2	1	N/A	2
SSM reports for HF Production	1	1	N/A	1
Periodic reports for PC Production	3	2	N/A	6
Periodic reports for AMF Production	1	2	N/A	2
Periodic reports for AR Production	2	2	N/A	4
Periodic reports for HF Production	1	2	N/A	2
LDAR reports for PC Production	3	2	N/A	6
LDAR reports for AMF Production	1	2	N/A	2
LDAR reports for AR Production	2	2	N/A	4
LDAR reports for HF Production	1	2	N/A	2
			Total	35

The number of Total Annual Responses is 35.

The total annual labor costs are $190,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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 3,240. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Source Categories: Generic

Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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 93 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $126,515. 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 115 labor hours at a cost of $5,230. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (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 a decrease in the total estimated respondent burden compared with the ICR currently approved by OMB. The decrease in burden from the most recently approved ICR is primarily because the number of sources in the PC and AMF has decreased.

However, there is a small increase in EPA burden and other changes to the burden calculation in this ICR. This ICR incorporates the requirements of the rule amendment to the PC and AMF subcategories. The rule amendment added requirements related to leak detection and repair (LDAR) and pressure relief devices (PRD) for subject PC and AMF facilities. We assume existing PC and AMF facilities will come into compliance with the new requirements during the three-year period covered under this ICR.

There is also an overall decrease in capital/startup vs. operation and maintenance (O&M) costs as calculated in section 6(b)(iii) compared with the ICR currently approved by OMB due to the decrease in overall number of respondents and also due to a revision to the assumptions

regarding the use of contractors to perform O&M in the PC production industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 93 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-2014-0069. 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-2014-0069 and OMB Control Number 2060-0420 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal)

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with Rule Requirements [e]	See 4A							
B. Required Activities for PC, AMF, AR, HF [e]	Included in 4C							
C. Create Information for PC, AMF, AR, HF [e]	Included in 4C							
D. Gather Information for PC, AMF, AR, HF [e]	Included in 4C							
E. Write report								
Initial notification requirements for pressure relief devices								
Polycarbonates (PC)	4	1	4	3	12	0.6	1.2	$779.66
Acrylic and Modacrylic Fibers (AMF)	4	1	4	1	4	0.2	0.4	$259.89
General initial notification requirements [e,f]								
Polycarbonates (PC)	52	1	52	0	0	0	0	$0
Acrylic and Modacrylic Fibers (AMF)	52	1	52	0	0	0	0	$0
Acetal Resins (AR)	52	1	52	0	0	0	0	$0
Hydrogen Fluoride (HF)	52	1	52	0	0	0	0	$0
Startup, shutdown and								

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
malfunction reports [g]								
Polycarbonates (PC)	N/A							
Acrylic and Modacrylic Fibers (AMF)	N/A							
Acetal Resins (AR)	2	1	2	2	4	0.2	0.4	$259.89
Hydrogen Fluoride (HF)	2	1	2	1	2	0.1	0.2	$129.94
Periodic reports [h]								
Polycarbonates (PC)	13.5	2	27	3	108	5.4	10.8	$7,016.98
Acrylic and Modacrylic Fibers (AMF)	15.5	2	31	1	31	1.55	3.1	$2,014.13
Acetal Resins (AR)	8	2	16	2	32	1.6	3.2	$2,079.10
Hydrogen Fluoride (HF)	8	2	16	1	16	0.8	1.6	$1,039.55
Leak detection and repair reporting [i]								
Polycarbonates (PC)	12	2	24	3	72	3.6	7.2	$4,677.98
Acrylic and Modacrylic Fibers (AMF)	12	2	24	1	24	1.2	2.4	$1,559.33
Acetal Resins (AR)	8	2	16	2	32	1.6	3.2	$2,079.10
Hydrogen Fluoride (HF)	8	2	16	1	16	0.8	1.6	$1,039.55
Subtotal for Reporting Requirements						***406***		***$22,935***
4. Recordkeeping Requirements								
A. Familiarize with Rule Requirements								
Polycarbonates (PC)	4	1	4	3	12	0.6	1.2	$779.66
Acrylic and Modacrylic Fibers (AMF)	4	1	4	1	4	0.2	0.4	$259.89
Acetal Resins (AR)	4	1	4	2	8	0.4	0.8	$519.78
Hydrogen Fluoride (HF)	4	1	4	1	4	0.2	0.4	$259.89
B. Plan activities								
Polycarbonates (PC)	40	1	40	3	120	6	12	$7,796.64

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
Acrylic and Modacrylic Fibers (AMF)	40	1	40	1	40	2	4	$2,598.88
Acetal Resins (AR) [e]	40	1	40	0	0	0	0	$0
Hydrogen Fluoride (HF) [e]	40	1	40	0	0	0	0	$0
C. Implementation activities								
Material determinations [e]	N/A							
Control equipment inspections								
a. Tanks								
Polycarbonates (PC)	N/A							
Acrylic and Modacrylic Fibers (AMF)	2	12	24	1	24	1.2	2.4	$2,775.49
Acetal Resins (AR)	2	12	24	2	48	2.4	4.8	$5,550.98
Hydrogen Fluoride (HF)	N/A							
b. Closed-vent systems								
Polycarbonates (PC)	2	2	4	3	12	0.6	1.2	$1,387.75
Acrylic and Modacrylic Fibers (AMF)	2	2	4	1	4	0.2	0.4	$462.58
Acetal Resins (AR)	2	2	4	2	8	0.4	0.8	$925.16
Hydrogen Fluoride (HF)	2	2	4	1	4	0.2	0.4	$462.58
Control equipment leak monitoring								
a. Cover vented to control device								
Polycarbonates (PC)	1	2	2	3	6	0.3	0.6	$693.87
Acrylic and Modacrylic Fibers	1	2	2	1	2	0.1	0.2	$231.29

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
(AMF)								
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	$462.58
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	$231.29
b. Closed vent system								
Polycarbonates (PC)	1	2	2	3	6	0.3	0.6	$693.87
Acrylic and Modacrylic Fibers (AMF)	1	2	2	1	2	0.1	0.2	$231.29
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	$462.58
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	$231.29
Control devices								
a. Initial requirements design analysis, performance test								
Polycarbonates (PC) [e]	80	1	80	0	0	0	0	$0
Acrylic and Modacrylic Fibers (AMF)	80	1	80	1	80	4	8	$5,197.76
Acetal Resins (AR) [e]	80	1	80	0	0	0	0	$0
Hydrogen Fluoride (HF) [e]	80	1	80	0	0	0	0	$0
b. Operate and maintain CMS								
Polycarbonates (PC)	8	12	96	3	288	14.4	28.8	$33,305.90
Acrylic and Modacrylic Fibers (AMF)	8	12	96	1	96	4.8	9.6	$11,101.97
Acetal Resins (AR)	8	12	96	2	192	9.6	19.2	$22,203.94
Hydrogen Fluoride (HF)	8	12	96	1	96	4.8	9.6	$11,101.97

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
Pressure relief devices								
Polycarbonates (PC)	2	1	2	3	6	0.3	0.6	$693.87
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	$231.29
Leak detection and repair program								
a. Initial requirements: Identify all affected streams								
Burden as a result of October 2014 Rule Amendment								
Polycarbonates (PC)	2	1	2	3	6	0.3	0.6	$389.83
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	$129.94
General Burden [e]								
Polycarbonates (PC)	20	1	20	0	0	0	0	$0
Acrylic and Modacrylic Fibers (AMF)	20	1	20	0	0	0	0	$0
Acetal Resins (AR)	20	1	20	0	0	0	0	$0
Hydrogen Fluoride (HF)	20	1	20	0	0	0	0	$0
b. Perform monitoring/repairs								
Polycarbonates (PC)				3				$6,020.00
Acrylic and Modacrylic Fibers (AMF)				1				$1,505.00
Acetal Resins (AR)	16	12	192	2	384	19.2	38.4	$24,949.25
Hydrogen Fluoride (HF) [j]	0.1	1092	109.2	1	109.2	5.46	10.92	$7,094.94

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
Container vapor tightness certification	N/A							
D. Develop Record System								
Develop startup, shutdown, malfunction plan [g]								
Polycarbonates (PC)	N/A							
Acrylic and Modacrylic Fibers (AMF)	N/A							
Acetal Resins (AR) [e]	20	1	20	0	0	0	0	$0
Hydrogen Fluoride (HF) [e]	20	1	20	0	0	0	0	$0
Control equipment								
Burden as a result of October 2014 Rule Amendment								
Spinning Lines (AMF)	2	1	2	1	2	0.1	0.2	$129.94
General Burden [e]								
Polycarbonates (PC)	16	1	16	0	0	0	0	$0
Acrylic and Modacrylic Fibers (AMF)	16	1	16	0	0	0	0	$0
Acetal Resins (AR)	16	1	16	0	0	0	0	$0
Hydrogen Fluoride (HF)	16	1	16	0	0	0	0	$0
Pressure relief devices								
Polycarbonates (PC)	2	1	2	3	6	0.3	0.6	$389.83
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	$129.94
Leak detection and repair program								
Polycarbonates (PC)	44	1	44	3	132	6.6	13.2	$8,576.30
Acrylic and Modacrylic Fibers	44	1	44	1	44	2.2	4.4	$2,858.77

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
(AMF)								
Acetal Resins (AR) [e]	40	1	40	0	0	0	0	$0
Hydrogen Fluoride (HF) [e]	40	1	40	0	0	0	0	$0
E. Record All Information Required by Standards								
Initial requirements [e]								
Polycarbonates (PC)	17	1	17	0	0	0	0	$0
Acrylic and Modacrylic Fibers (AMF)	17	1	17	0	0	0	0	$0
Acetal Resins (AR)	17	1	17	0	0	0	0	$0
Hydrogen Fluoride (HF)	17	1	17	0	0	0	0	$0
Control equipment inspections								
Polycarbonates (PC)	1	2	2	3	6	0.3	0.6	$389.83
Acrylic and Modacrylic Fibers (AMF)	1	2	2	1	2	0.1	0.2	$129.94
Acetal Resins (AR)	1	2	2	2	4	0.2	0.4	$259.89
Hydrogen Fluoride (HF)	1	2	2	1	2	0.1	0.2	$129.94
Control equipment monitoring [k]								
Polycarbonates (PC)	1	52	52	3	156	7.8	15.6	$10,135.63
Acrylic and Modacrylic Fibers (AMF)	1	52	52	1	52	2.6	5.2	$3,378.54
Acetal Resins (AR)	1	52	52	2	104	5.2	10.4	$6,757.09
Hydrogen Fluoride (HF)	1	52	52	1	52	2.6	5.2	$3,378.54
Control device CMS								
Polycarbonates (PC)	1	12	12	3	36	1.8	3.6	$2,338.99
Acrylic and Modacrylic Fibers (AMF)	1	12	12	1	12	0.6	1.2	$779.66
Acetal Resins (AR)	1	12	12	2	24	1.2	2.4	$1,559.33
Hydrogen Fluoride (HF)	1	12	12	1	12	0.6	1.2	$779.66
Pressure relief devices								

Burden item	(A) Person hours per occurrence [a]	(B) No. of occurrences per respondent per year [b]	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [c]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [d]
Polycarbonates (PC)	2	1	2	3	6	0.3	0.6	$389.83
Acrylic and Modacrylic Fibers (AMF)	2	1	2	1	2	0.1	0.2	$129.94
Leak detection and repair program								
Polycarbonates (PC)	20	1	20	3	60	3	6	$3,898.32
Acrylic and Modacrylic Fibers (AMF)	20	1	20	1	20	1	2	$1,299.44
Acetal Resins (AR)	16	1	16	2	32	1.6	3.2	$2,079.10
Hydrogen Fluoride (HF)	16	1	16	1	16	0.8	1.6	$1,039.55
F. Time to Train Personnel								
Material determination methods	N/A							
Control equipment inspection and monitoring [l]								
Polycarbonates (PC)	8	1	8	3	24	1.2	2.4	$1,559.33
Acrylic and Modacrylic Fibers (AMF)	8	1	8	1	8	0.4	0.8	$519.78
Acetal Resins (AR)	8	1	8	2	16	0.8	1.6	$1,039.55
Hydrogen Fluoride (HF)	8	1	8	1	8	0.4	0.8	$519.78
Leak detection and repair program[h,l]								
Polycarbonates (PC)	10	1	10	3	30	1.5	3	$1,949.16
Acrylic and Modacrylic Fibers (AMF)	10	1	10	1	10	0.5	1	$649.72
Acetal Resins (AR)	2	1	2	2	4	0.2	0.4	$259.89
Hydrogen Fluoride (HF)	2	1	2	1	2	0.1	0.2	$129.94
Container leak tight method	N/A							
Subtotal for Recordkeeping Requirements					***2,833***			***$167,564***
TOTAL ANNUAL BURDEN AND COST (rounded):					***3,240***			***$190,000***
Capital and O&M Cost (see Section 6(b)(iii)):								***$127,000***
GRAND TOTAL (Labor Cost + Capital/O&M)								***$317,000***

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

Assumptions:

[a] Estimate of burden for each activity, technical hours only.

[b] Estimate based on average facilities.

[c] We have assumed that there are 7 existing sources (3 PC, 1 AMF, 2 AR, and 1 HF) and that no additional new sources will become subject to the rule over the next three years.

[d] Costs are rounded and based on the following hourly rates: Technical at $55.25, Management at $117.20, and Clerical at $38.62. These labor rates are based on the May 2013 National Occupational Employment and Wage Estimates for the United States, occupational codes 51-8091 for chemical plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical).

[e] We have assumed that affected facility owners and operators have already complied with this one-time activity.

[f] Initial notification requirements include: initial notifications, initial compliance determination, and initial performance tests.

[g] All major sources except for those in the PC and AMF subcategories must submit startup, shutdown, malfunction reports semiannually when actions are taken in the event of a startup, shutdown, or malfunction that are consistent with the source's SSM plans. Sources can submit this information with the periodic reports.

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

[i] The standards for equipment leak requires the submittal of an initial report and semiannual reports of leak detection and repair (LDAR) and any changes to the processes, monitoring frequency and initiation of a quality improvement program. We have assumed that sources are submitting the required periodic LDAR information with the semiannual reports and that affected facility owners and operators have already complied with the one-time initial report.

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

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

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards for Acetal Resin; Acrylic and Modacrylic Fiber; Hydrogen Fluoride and Polycarbonate Production (40 CFR Part 63, Subpart YY) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year[a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
Report Review								
Initial Requirements								
a. Initial notification [c]	2	1	2	0	0	0	0	$0
b. Performance test [c, d]	2	1	2	0	0	0	0	$0
c. Compliance status [e]	4	1	4	4	16	0.8	1.6	$837.44
d. Performance test reports [c, d]	4	1	4	0	0	0	0	$0
Periodic Requirements								
a. Periodic reports	3	2	6	7	42	2.1	4.2	$2,198.28
b. Leak detection and repair reports [c, f]	3	2	6	7	42	2.1	4.2	$2,198.28
c. Startup, shutdown, malfunction reports [c, g]	2	1	2	0	0	0	0	$0
TOTAL ANNUAL EPA BURDEN AND COST (Rounded)					**115**			**$5,230**

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

Assumptions

(a) We have assumed that there are 7 existing sources (3 PC, 1 AMF, 2 AR, and 1 HF) and that no additional new sources will become subject to the rule over the next three years.

(b) 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) We have assumed there will be no new sources over the next three years of this ICR. We have also assumed that existing sources have already complied with this activity.

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

(e) We have assumed that existing sources have already complied with this activity, except for facilities in the AMF and PC source categories subject to new requirements.

(f) The equipment leak standards require the submittal of an initial report and semiannual report of leak detection and repair (LDAR) program experiencing any

changes to the processes, monitoring frequency and initiation of a quality improvement program. We have assumed that sources are submitting the required LDAR information with the periodic reports.

(g) All major sources except for those in the PC and AMF subcategories must submit startup, shutdown, malfunction reports semiannually when actions are taken in the event of a startup, shutdown, or malfunction that are consistent with the source's SSM plans. We have assumed that all sources have already developed a startup, shutdown and malfunction (SSM) plan. We have further assumed that sources are submitting their information on SSM with the periodic report which is submitted on a semiannual basis.