

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	1	15	0	0	16
2	1	16	0	0	17
3	1	17	0	0	18
Average	1	16	0	0	17

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

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 notification	1	1	0	1
Application for construction/reconstruction	1	1	0	1
Notification of performance test	1	1	0	1
Notification of compliance status	1	1	0	1
Initial compliance report				
Loop slitter sources	0	1	0	0
Flame lamination sources	1	1	0	1
Subsequent compliance reports				
Loop slitter sources	0	1	0	0
Flame lamination sources	17	2	0	34
SSM report	17	10	0	170
			Total	209

ERG Notes:

-prev renewa

hrs/response: 90.4

al: 173 responses, 90 hrs/response. Net increase due to industry growth.

Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam

Burden item	A	B	C
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)
1. Familiarization with rule requirements	4	1	4
2. Gather information	4	1	4
3. Reports			
a. Initial notification	2	1	2
b. Application for construction/reconstruction	2	1	2
c. Notification of performance test	2	1	2
d. Notification of compliance status	20	1	20
e. Initial compliance report			
i. Flame lamination facilities	8	1	8
ii. Loop slitter facilities	8	1	8
f. Annual compliance report ^c	2	1	2
g. Semiannual compliance report	4	2	8
h. SSM report ^d	2	10	20
Reporting Subtotal			
3. Recordkeeping requirements			
a. Plan activities	10	1	10
b. Implement activities for flame lamination			
i. Record SSM	1	100	100
ii. Conduct performance test ^e	50	1	50
iii. Record CPMS measurements	2	300	600
iv. CPMS calibration and maintenance ^f	4	50	200
c. Implement activities for loop slitters			
i. Record adhesives used and suppliers	1	1	1
ii. Conduct Method 311 test	4	1	4
d. Develop record system			
i. SSM plan	40	1	40
ii. CPMS maintenance plan	20	1	20
e. Time to train personnel			
i. CPMS acquisition and installation	20	1	20
ii. CPMS inspection and monitoring	4	1	4
f. Store, file, and maintain all records ^g	1	12	12
g. Retrieve records/reports ^h	1	12	12
Recordkeeping Subtotal			
TOTAL ANNUAL BURDEN AND COST (ROUNDED)			
TOTAL ANNUAL CAPITAL AND O&M COST (SEE SECTION 6(b)(iii))			
GRAND TOTAL (LABOR, CAPITAL, AND O&M)			

CPMS - Continuous Parameter Monitoring System

SSM - Startup, Malfunction, or Startup

Assumptions:

a EPA estimates an average of 16 existing sources will be subject to the standard. One additional new source (flam ICR).

b This ICR uses the following labor rates: \$103.97 (technical), \$129.93 (managerial), and \$51.79 (clerical). These Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column for the benefit packages available to those employed by private industry.

c Applies to loop slitter adhesive facilities only.

d EPA assumes each respondent will submit SSM reports ten times per year.

e EPA assumes this activity also includes writing the site-specific test plan.

f EPA assumes each respondent will implement CPMS calibration and maintenance activities 50 times per year.

g EPA assumes each respondent will file and maintain records on a monthly basis.

h EPA assumes each respondent will retrieve records/reports 12 times per year.

1 Fabrication (40 CFR Part 63, Subpart M) (Renewal)

Labor Rates: \$103.97 \$129.93 \$51.79

Source Type	No.
Existing	16
New	1

D	E	F	G	H
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	4	0.2	0.4	462.58
17	68	3.4	6.8	7,863.89
1	2	0.1	0.2	231.29
1	2	0.1	0.2	231.29
1	2	0.1	0.2	231.29
1	20	1	2	2,312.91
1	8	0.4	0.8	925.16
0	0	0	0	0
0	0	0	0	0
17	136	6.8	13.6	15,727.79
17	340	17	34	39,319.47
		669		67,306
1	10	0.5	1	1,156.46
17	1,700	85	170	196,597.35
1	50	2.5	5	5,782.28
17	10,200	510	1,020	1,179,584.1
17	3,400	170	340	393,194.7
0	0	0	0	0
0	0	0	0	0
1	40	2	4	4,625.82
1	20	1	2	2,312.91
1	20	1	2	2,312.91
1	4	0.2	0.4	462.58
17	204	10.2	20.4	23,591.68
17	204	10.2	20.4	23,591.68
		18,229		1,833,212
		18,900		1,900,000
				29,500
				1,930,000

ERG Notes: 17

Prev renewal: 15,601 hrs and \$1,49

ie lamination) will become subject to the rule over the three-year period of this

rates are from the United States Department of Labor, Bureau of Labor
1, "Total compensation." They have been increased by 110 percent to account

14,882. Net increase due to industry growth.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foa

Labor Rates:

	A	B	C	D
Burden item	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a
Review initial notification	4	1	4	1
Review application for construction/reconstruction	4	1	4	1
Review notification of performance test	4	1	4	1
Review notification of compliance status	20	1	20	1
Review initial compliance report				
Flame lamination facilities	20	1	20	1
Loop slitter facilities	2	1	2	0
Review annual compliance report ^c	1	1	1	0
Review semiannual compliance report	15	2	30	17
Review SSM report	8	10	80	17
TOTAL ANNUAL BURDEN AND COST (ROUNDED)				

Assumptions:

a EPA estimates an average of 16 existing sources will be subject to the standard. One additional new source (flam 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 on the General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for

c Applies to loop slitter adhesive facilities only.

mm Fabrication (40 CFR Part 63, Subpart Mmmmm) (Renewal)

\$46.67 \$62.90 \$25.25

E	F	G	H
Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
4	0.2	0.4	209.36
4	0.2	0.4	209.36
4	0.2	0.4	209.36
20	1	2	1,046.8
20	1	2	1,046.8
0	0	0	0
0	0	0	0
510	25.5	51	26,693.4
1,360	68	136	71,182.4
2,210			101,000

ERG Notes:

Prev renewal: 1,831 hrs and \$82,501. Net incre

ie lamination) will become subject to the rule over the three-year

tes are from the Office of Personnel Management (OPM), 2014
the benefit packages available to government employees.

ase due to industry growth.

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

(A)	(B)	(C)	(D)	(E)
Requirement	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C) ^b	Annual O&M Costs for One Respondent
Differential pressure, pH, liquid flow rate, data recorder	\$997	1	\$997	\$1,674
Total			\$997	

N/A - Not Applicable

(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
17	\$28,458
	\$28,500

ERG Notes

Prev renewal: Cap/Startup = \$997; O&M = \$1,67.

