

**Table 1: Annual Respondent Burden and Cost – NESHAP for Benzene Waste Operations (40 C**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (AxB)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person-hours per year (Cx D)</b>
1. Applications	N/A				
2. Surveys and studies	N/A				
3. Reporting requirements					
a. Familiarize with rule requirement	See 3C				
b. Required activities	See 3C				
c. Create information					
i. Determine quantity of benzene in waste <sup>l</sup>	2	1	2	0	0
ii. Initial waste determination <sup>l</sup>	2	1	2	0	0
iii. Treatment performance evaluation <sup>l</sup>	2	1	2	0	0
iv. Annual waste determination <sup>c,d</sup>	2	1	2	270	540
v. Monthly treated waste analysis <sup>e,f</sup>	1	12	12	14	168
vi. Treatment/control device monitoring	See 4C				
vii. Initial visual inspection <sup>l</sup>	2	1	2	0	0
viii. Quarterly visual inspection <sup>g</sup>	2	4	8	135	1,080
ix. Annual method 21 monitoring <sup>h</sup>	6	1	6	135	810
d. Gather existing information	See 3E				
e. Write report					
New source					
Notification of const/reconstruction	N/A				
Notification of anticipated/actual startup	N/A				
Notification/report of performance test	N/A				
Existing sources					
Initial report	N/A				
Quarterly emission report	4	4	16	135	2,160
Annual report	1	1	1	270	270
Notification of offsite facility <sup>i</sup>	2	12	24	14	336
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
a. Familiarize with rule requirement	See 3A				
b. Plan activities	See 4C				
c. Implement activities					
i. Filing and maintain records <sup>j</sup>	78	1	78	135	10,530
ii. Concentration data (annual benzene quantity determination) <sup>k</sup>	0.5	12	6	121	726
iii. Concentration data	0.5	12	6	14	84
iv. Waste quantity data <sup>l</sup>	1	1	1	0	0
d. Develop record system	See 4C				
e. Time to enter information	See 4C				

f. Train Personnel	N/A				
g. Audits	N/A				
<b>Subtotal for Recordkeeping Requirements</b>					
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>m</sup></b>					
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>					
<b>TOTAL COST: <sup>m</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 270. There will be no
- <sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.9 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June
- <sup>c</sup> We have assumed that it will take each respondent two hours once per year to create the annual waste determination.
- <sup>d</sup> We have assumed that all facilities above 1 Mg/yr must evaluate waste streams annually TAB report.
- <sup>e</sup> We have assumed that it will take one hour each month for each respondents to create the monthly treated waste analysis
- <sup>f</sup> We have assumed that 90 percent of 135 sources (121) will monitor process parameters, and the remaining 10 percent (
- <sup>g</sup> We have assumed that 135 facilities that are expected to be greater than 10 Mg per year must comply with the quarterly
- <sup>h</sup> We have assumed that 135 respondents will each take six hours once per year to comply with the annual method 21 monitoring
- <sup>i</sup> We have assumed that 10 percent of facilities (14) will choose to ship their waste offsite once a month for treatment.
- <sup>j</sup> We have assumed that 135 respondents will take 78 hours once per year to comply with the record requirements.
- <sup>k</sup> We have assumed that 121 respondents will take 30 minutes twelve times per year to repeat the benzene quantity determination
- <sup>l</sup> We have assumed that this is a onetime only activity.
- <sup>m</sup> Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.



<b>13,041</b>		<b>\$1,311,419.97</b>
<b>19,200</b>		<b>\$1,930,000</b>
		<b>\$0</b>
		<b>\$1,930,000</b>

20 hr/resp

additional new sources that will become subject to the rule over the three-year period of the ICR. It is estimated that 13,041 hours per hour for Technical labor, and \$51.79

2014, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compens

is information (0.5 hours for collection activities for all samples and 0.5 hours per sample for analysis for a total of 1 hour per sample). 14) must conduct monthly sampling.

visual inspection requirements.

monitoring requirements.

ination.

5 sources that have a total annual benzene (TAB) quantity waste between 1 Mg/yr and 10 Mg/yr must file an annual report. It is  
ation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by privat  
11 per sample).

s also estimated that 135 sources that have a TAB greater than 10 Mg/yr and have complied with the control requirements must  
e industry.

: file quarterly reports.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Benzene Waste Operation**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (AxB)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person-hours per year (CxD)</b>	<b>(F) Management person hours per year (Ex0.05)</b>
Initial performance tests	N/A					
Report Review	N/A					
New Plant						
Notification of construction <sup>c</sup>	2	1	2	0	0	0
Notification of anticipated startup	N/A					
Notification of actual startup	N/A					
Initial report	N/A					
Notification of performance test	N/A					
Existing Plants						
Quarterly reports <sup>d</sup>	2	4	8	135	1,080	54
Annual recertification	1	1	1	270	270	13.5
<b>TOTAL ANNUAL BURDEN AND COST<sup>f</sup></b>						<b>1,550</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 270 and there v

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account

<sup>c</sup> We have assumed that this is a one-time activity for each new facility.

<sup>d</sup> We have assumed that 135 respondents will review quarterly reports.

<sup>e</sup> It is assumed that all respondents will take one hour each per year to review annual recertification.

<sup>f</sup> Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

ns (40 CFR Part 61, Subpart FF) (Renewal)

(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
0	0.0
108	\$56,527.20
27	\$14,131.80
	<b>\$70,700</b>

Labor Rates

Tech	46.67
Mngmt	62.9
Cler	25.25

will be no additional new sources that will become subject to the rule over the three-year period of the ICR. It is estimated that for government overhead expenses: \$62.90 for Managerial (GS-13, Step 5, \$39.31 x 1.6), \$46.67 for Technical (GS-12, Ste

hat 135 sources that have a total annual benzene (TAB) quantity waste between 1 Mg/yr and 10 Mg/yr must file an annual report. The cost of the report is \$29.17 (GS-1, \$18.23 x 1.6), and \$25.25 Clerical (GS-6, Step 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management.

al report. It is also estimated that 135 sources that have a TAB greater than 10 Mg/yr and have complied with the control  
gement (OPM) “2015 General Schedule” which excludes locality rates of pay.

. requirements must file quarterly reports.