

Number of Respondents					
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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

*Added two respondents per EP

A's instructions

Total Annual Responses

(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Notification of applicability	0	1	0
Notification of construction/reconstruction	0	1	0
Notification of actual startup	0	1	0
Notification of special compliance requirements	0	1	0
Notification of initial performance test	0	1	0
Notification of compliance status	0	1	0
Excess emissions report	1.6	2	0
Report of no excess emissions	6.4	2	0
Quality improvement plan	0	1	0
Startup, shutdown, and malfunction report	0	1	0
			Total

(E)
Total Annual Responses
$E=(B \times C)+D$
0
0
0
0
0
0
0
3.2
12.8
0
0
16

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
Baghouse Leak Detection	\$22,350	0	\$0	\$750	8	\$6,000
Total			\$0			\$6,000

* Added tw

0 respondents per EPA's instructions

Burden Items	(A) Person hours per occurrence	(B) Occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements ^c	4	1	4	8	32
B. Required Activities					
Initial performance test ^d	421	1	421	0	0
Repeat performance test ^{d,e}	421	0.2	84.2	0	0
Operations, maintenance, and monitoring plan ^f	40	1	40	0	0
Startup, shutdown, and malfunction plan ^g	40	1	40	0	0
COS Testing ^q				8	
HCl/HF Testing ^q				8	
Phenol and methanol testing ^q				8	
C. Create Information	See 3B				
D. Gather Existing Information	See 3B				
E. Write Reports					
Notification of applicability ^h	2	1	2	0	0
Notification of construction/ reconstruction ^h	2	1	2	0	0
Notification of actual startup ^h	2	1	2	0	0
Notification of special compliance requirements ^h	2	1	2	0	0
Notification of initial performance test ^h	2	1	2	0	0
Notification of compliance status ^h	2	1	2	0	0
Request for extension of compliance adjustment to time periods, and changes in information ^h	2	1	2	0	0
Report of performance test	See 3B				
Excess emissions report ⁱ	16	2	32	1.6	51.2
Report of no excess emission ^j	8	2	16	6.4	102.4
Quality improvement plan ^k	40	1	40	0	0
Startup, shutdown, and malfunction report ^l	8	2	16	0	0
Subtotal for Reporting					
4. Recordkeeping Requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan Activities	See 3E				
C. Implement Activities	See 3E				
D. Develop Record System	See 3E				
E. Time to Enter Information					
Records of operating parameters and emissions ⁿ	4	52	208	8	1664
F. Time to transmit or disclose information ^o	0.25	2	0.5	8	4

G. Time to Train Personnel	N/A				
H. Time for Audits	N/A				
Subtotal for Recordkeeping					
Total Labor Burden and Cost (rounded) ^p					
Capital and O&M Cost (see Section 6(b)(iii)): ^p					
TOTAL COST: ^p					

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no additional of this ICR.
- ^b This ICR uses the following labor rates: \$138.43 for Managerial, \$106.45 for Technical, and \$52.77 for Clerical.
- ^c We have assumed that it will take each respondent 4 hours to familiarize with the regulatory requirements.
- ^d We have assumed that it will take 421 hours for each respondent to complete performance test based on the following: (1.7 source +200 hours for calibration, retesting, sample analysis, etc) for a total of 421 hours.
- ^e We have assumed that 20% of respondents will have to repeat performance test due to failure.
- ^f We have assumed that each of the respondents will take 40 hours to prepare the operation, maintenance, and monitoring plan.
- ^g We have assumed that each of the respondents will take 40 hours to prepare the startup, shutdown, and malfunction plan.
- ^h We have assumed that each of the respondents will take 2 hours to write reports.
- ⁱ We have assumed that 20% of respondents will each take 16 hours two times per year to write excess emission reports.
- ^j We have assumed that 80% of respondents will take 8 hours two times per year to complete the report for no excess emissions.
- ^k We have assumed that 10% of facilities are required to prepare a quality improvement plan each year.
- ^l We have assumed that each respondent will take 8 hours two times per year to complete a startup, shutdown, and malfunction plan.
- ^m We have assumed that the respondents will each take 4 hours to familiarize with the regulatory requirements.
- ⁿ We have assumed that each respondent will take 4 hours 52 times per year to enter information.
- ^o We have assumed that it will take each respondent 15 minutes (0.25 hours) two times per year to transmit or disclose information.
- ^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- ^q We estimate annualized compliance testing cost will cost \$59,200 for all 8 facilities (\$34,400 for COS test, \$10,400 for HCHO/methanol test). See EPA-HQ-OAR-2010-1041-0171.pdf

138.43 52.77

(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year, \$ ^b
1.6	3.2	\$3,796.75
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
		\$34,400
		\$10,400
		\$14,400
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.56	5.12	\$6,074.80
5.12	10.24	\$12,149.61
0	0	\$0
0	0	\$0
213		\$81,221.16
83.2	166.4	\$197,431.10
0.2	0.4	\$474.59

1,918		\$197,905.70
2,130		\$279,000
		\$6,000
		\$285,000

133 hr per resp

new sources over the three-year period

sources per plant x 130 hours per

m.

ons.

on report.

nation.

l/HF test, and \$14,400 for

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (Cx D)
Initial performance tests					
New or modified facility	40	1	40	0	0
Repeat performance tests					
A. Familiarization with the regulatory requirements ^c	40	0.2	8	0	0
Report review					
Notification of applicability	2	1		0	
Notification of construction/ reconstruction	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of special compliance requirements	1	1	1	0	0
Notification of initial performance test	2	1	2	0	0
Notification of compliance status	2	1	2	0	0
Request for extension of compliance, adjustment to time p	2	1	2	0	0
Quality improvement plan ^d	40	1	40	0	0
Operations, maintenance, and monitoring plan	40	1	40	0	0
Startup, shutdown, and malfunction plan ^e	40	1	40	0	0
Report of performance test	40	1	40	0	0
Excess emissions report ^f	20	2	40	1.6	64
Report of no excess emissions ^g	2	2	4	6.4	25.6
Startup, shutdown, and malfunction report ^h	20	2	40	8	320
Review compliance test reports for COS for cupolas and formaldehyde, phenol, and methanol for collection/curing operations ⁱ	8	1	8	8	64
Total Labor Burden and Cost (rounded)^j					

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no addit
- ^b This ICR uses the following labor rates: \$64.16 for Managerial, \$47.62 for Technical, and \$25.76 for Clerical.
- ^c We have assumed that 20% of respondents will fail the performance test.
- ^d We have assumed that it will take 40 hours for each respondent to review the quality improvement plan report.
- ^e We have assumed that it will take 40 hours for each respondent to review the startup, shutdown, and malfunction plan
- ^f We have assumed that 20% of respondents will take 20 hours to review the excess emissions report.
- ^g We have assumed that 80% of respondents will take 2 hours to review the report of no excess emissions.
- ^h We have assumed that each respondent will take 20 hours to review the startup, shutdown, malfunction report.
- ⁱ Assumes Agency will review all of the annual reports - including the new COS, phenol, and methanol emissions testi
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

64.16 25.76

(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
3.2	6.4	\$3,417.86
1.28	2.56	\$1,367.14
16	32	\$17,089.28
3.2	6.4	\$3,417.86
545		\$25,300

ional new sources over the three-year period of this ICR.

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