SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal), EPA ICR Number 1717.11, OMB Control Number 2060-0313.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations (OSWRO) were proposed on October 13, 1994, promulgated on July 1, 1996, and most recently amended on March 18, 2015. The 2015 amendment included revision to storage tank requirements, revisions to the LDAR requirements, and requirements to monitor pressure release devices (PRD). In this ICR, we assume existing sources have already complied with initial requirements associated with the 2015 rule.

These regulations apply to existing facilities and new facilities with organic hazardous air pollutant (HAP) emissions that are involved in waste management and recovery operations, and that are not subject to Federal air standards under other subparts in Part 63. In addition, Subpart DD cross-references control requirements to be applied to specific types of affected sources: tankslevel-1; containers; surface impoundments; individual drain systems; oil-water separators; organic water separators; and loading, transfer, and storage systems. 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 DD.

In general, all NESHAP standards require initial notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such 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 U.S. Environmental Protection Agency (EPA) regional office.

The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal). The Federal Government’s “burden” is attributed entirely to

work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal).

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).

Over the next three years, approximately 45 respondents per year will be subject to these standards, and no additional respondents per year will become subject to theses same standards. The estimated size of the regulated universe is based on data from the National Emissions Inventory (NEI), available permit data, and information collected in the 2013 OSWRO ICR survey.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance".

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 off-site waste and recovery operations either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart DD.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards 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 that the standards are 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.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

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, duplication does not exist.

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 (81 FR 26546) on May 3, 2016. 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 the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations 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 both the Solid Waste Association of North America (SWANA), at (800) 467-9262 and Safety-Kleen, at (800) 323-5040.

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 these 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 (CBI) (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 facilities with off-site waste and recovery operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 63, Subpart DD)	NAICS Codes
Crude Petroleum and Natural Gas Extraction	211111
Water Supply and Irrigation Systems	221310
Highway, Street, and Bridge Construction	237310
Petroleum Refineries	324110
Other Basic Inorganic Chemical Manufacturing	325180
Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing	325194
All Other Basic Organic Chemical Manufacturing	325199
Plastics Material and Resin Manufacturing	325211
Cement Manufacturing	327310
Alumina Refining and Primary Aluminum Production	331313
Photographic and Photocopying Equipment Manufacturing	333316
Aircraft Manufacturing	336411
Other Chemical and Allied Products Merchant Wholesalers	424690
Office Administrative Services	561110
Solid Waste Collection	562111
Hazardous Waste Treatment and Disposal	562211
Solid Waste Combustion and Incinerators	562213
Other Nonhazardous Waste Treatment and Disposal	562219
Materials Recovery Facilities	562920

National Security [a]	928110

[a] One facility is operated by the U.S. Department of Defense. Small business size standards are not established for this sector.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD).

A source must make the following reports:

Notifications	
Notification and application of construction/reconstruction	63.5(d)
Notification of initial startup	63.9(b)
Notification of initial performance test	63.7(b) , 63.9(e)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical and operational change	63.10
Notification of performance tests	63.7(b), 63.697(b)(1)
Performance test results	63.8(e)(5), 63.697(b)(2)
Startup, shutdown, malfunction reports	63.697(b)(3)
Notification of tank floating roof inspection	63.686(b)(3)
Notification of oil/water separator floating roof inspection	63.687(d)(6)
Notification to tank refill	63.697(d)(1)
Notification of seal gap measurements	63.697(d)(2)

Reports	
Initial performance test results	63.10(d)(2)
Opacity or visible emissions	63.10(d)(3)
Periodic startup, shutdown, malfunction reports (included with semiannual reports)	63.10(d)(5)(i), 63.697(b)(3)
Source status report	63.10(e)(3)

Reports	
Excess emission reports	63.10(e)(3), 63.695(e)(3)
Semiannual summary report	63.697(b)(4)-(6)
Initial pressure relief device description	63.697(a)(1)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative.	63.10(b)(2)
All reports and notifications.	63.10(b)
Record of applicability.	63.10(b)(3), 63.696(b)(3)
Records of sources with continuous monitoring systems.	63.10(c)
Records of startup, shutdown, and malfunctions, and pollution control system maintenance.	63.696(b)(1)
Documentation of extension of tank emptying schedule.	63.696(c)
Records of results of seal gap measurements and description of repairs.	63.686(d)(3)
Record of sampling plan for determining volatile organic hazardous air pollutant (VOHAP) concentration at point of treatment	63.694(c)
Record of sampling plan for determining maximum HAP vapor pressure in tanks.	63.694(j)(2)(1)
Record of maximum HAP vapor pressure determinations for covered tanks	63.686(c)(5)
Records of tank floating roof design, inspections, defects and repairs	63.696(d)
Records of tank fixed roof inspections, defects and repairs	63.696(e)
Records of tank enclosure measurements and calculations	63.696(f)
Records of anticipated and completed planned routine maintenance	63.696(g)
Control device malfunction records	63.696(h)
Records of releases from pressure relief devices	63.696(i)
Records of control device bypasses	63.696(j)
Records should be retained for 5 years.	63.10(b)(1)

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 control device.
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.
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 the Enforcement and Compliance History Online (ECHO) and ICIS.

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 standards, and note the operating conditions under which compliance was achieved. 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

A majority of the respondents are large entities (i.e., large businesses). According to the *Off-Site Waste and Recovery Operations NESHAP: Economic Impact Analysis,* (EPA-452/R-96-011, June 1996), EPA specifically identified 388 firms that own 621 potentially affected facilities at that time. These 388 firms include 110 small businesses that own 112 facilities; therefore, this ICR assumes that approximately 18 percent of the total facilities are small businesses (8 of 45).

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. 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 below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 record-keeping and reporting requirements is estimated to be 40,600 hours (Total Labor Hours from Table 1 below). 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	$138.43 ($65.92+ 110%)
Technical	$106.45 ($50.69 + 110%)
Clerical	$52.77 ($25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “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 costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage. In this ICR, we assume existing sources have already complied with initial requirements associated with the 2015 amendment, including the purchase of new equipment. As such, there are no capital/startup costs.

As part of the 2015 amendment to the OSWRO NESHAP, facility owners or operators are required to monitor each PRD that releases to the atmosphere using a device or system that is capable of identifying and recording the time and duration of each pressure release and of notifying operators that a release has occurred. The cost for installing electronic indicators on the PRDs, based on an average of 13 PRDs at each plant, is estimated to be $38,886 per plant.

For equipment leaks, facility owners or operators would also be required to follow the leak detection and repair (LDAR) requirements of 40 CFR Part 63, Subpart H, rather than 40 CFR Part 63, Subpart V under the proposed amendments to the OSWRO NESHAP, including connector monitoring requirements. The capital costs associated with this requirement are estimated to be $41,254 per plant.

The rule requires storage vessels of certain sizes and containing materials above certain vapor pressures to use Level 2 controls. It is assumed that tanks requiring control will be routed to an existing control device. Consequently, the only costs associated with the requirements are the costs of additional duct work for the estimated 21 additional tanks that would be controlled with Level 2 controls under the new threshold. The capital costs associated with the additional duct work were estimated at approximately $76,000 with an annual cost of approximately $21,000.

(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 [2]	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
O&M	$0	0	$0	$1,505.00	45	$67,725
LDAR	$41,254	0	$0	$11,876	45	$534,420
PRD Monitoring	$38,886	0	$0	$5,537	45	$249,165

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Equipment						
Storage Tanks Duct Work[1]	$76,412	0	$0	$20,797	1	$20,797
Photocopy and Postage				$22.71	90	$2,044
Total			$0			$874,000

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
[1] Costs shown are the total costs for the estimated 21 additional tanks captured under the new 2015 threshold.
[2] For the PRD monitors, annualized costs are calculated by multiplying the capital recovery factor by the capital cost. The capital recovery factor is 0.1424 based on an interest rate of 7 percent and an assumed equipment life of 10 years. For the LDAR requirements, the capital recovery factor is also 0.1424, and for storage tank requirements, the capital recovery factor is 0.1098 based on an interest rate of 7 percent and an assumed equipment life of 15 years. In addition, for the LDAR and storage tank requirements, other annual monitoring and operating costs are included in the annual costs.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $874,000. 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 $874,000. 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 such activities 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 $19,200.

This cost is based on the average hourly labor rate as follows:

Managerial	$64.16 (GS-13, Step 5, $40.10 + 60%)
Technical	$47.62 (GS-12, Step 1, $29.76 + 60%)
Clerical	$25.76 (GS-6, Step 3, $16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 45 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 45 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	45	0	0	45
2	0	45	0	0	45
3	0	45	0	0	45
Average	0	45	0	0	45

[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 45.

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 notification (PRD)	45	0	0	0
Semiannual Report	45	2	0	90
			Total	**90**

The number of Total Annual Responses is 90.

The total annual labor costs are $4,190,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 40,600. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 451 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $874,000. 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 414 labor hours at a cost of $19,200. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (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 respondent labor hours, labor costs, and the number of responses. The decrease reflects an update in the estimated respondent universe. The previously-

approved ICR (1717.09) estimated 236 sources. In developing the 2015 amendment, we estimate that only 45 sources are subject to these standards. The estimated size of the regulated universe is based on data from the National Emissions Inventory (NEI) database, available permit data and information collected in the 2013 OSWRO ICR survey.

However, there is an increase in the total O&M cost compared to the previously approved ICR. This cost increased because the current ICR incorporates additional requirements associated with the 2015 amendment, including additional O&M cost associated with LDAR and PRD monitoring equipment.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 451 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-2013-0336. 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), WJC 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) 566-1752. 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-2013-0336 and OMB Control Number 2060-0313 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 Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal)

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [b]	(E) Technical person hours per year (CxD)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total costs per year $ [a]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with rule requirement [c,d]	4	1	4	45	180	9	18	$21,356.73
B. Required Activities	See 4C							
C. Create Information	See 4C							
D. Gather Existing Information [c, e]	See 4C							
E. Write Reports								
Initial Notification Report [c, f]	1	1	1	0	0	0	0	$0
Performance Test Notification Report [c, f]	1	1	1	0	0	0	0	$0
Compliance Status Notification [c, f]	2	1	2	0	0	0	0	$0
Performance Test Reports [c, f]	8	1	8	0	0	0	0	$0
Startup/Shutdown/Malfunction Report	See Semiannual Summary Report							
Semiannual Summary Report [g]	8	2	16	45	720	36	72	$85,426.92
Subtotal for Reporting Requirements						**1,035**		**$106,783.65**
4. Recordkeeping Requirements								
A. Familiarize with rule requirement [c]	See 3A							
B. Planned Activities [c]	40	1	40	0	0	0	0	$0
C. Implementation of Activities								
a. VOHAP concentration determination								
Commercial Facilities [h]	2	260	520	23	11,960	598	1,196	$1,419,036.06
Other Facilities [i]	2	12	24	23	552	27.6	55.2	$65,493.97

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [b]	(E) Technical person hours per year (CxD)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total costs per year $ [a]
b. Vapor Pressure Determination								
Commercial Facilities [h]	1	260	260	23	5,980	299	598	$709,518.03
Other Facilities [i]	1	12	12	23	276	13.8	27.6	$32,746.99
c. Control Equipment Visual Inspection								
Large Cover	0.25	10	2.5	45				
Small Cover	0.05	1000	50	45				
Closed Vent System	0.5	5	2.5	45				
d. Control Equipment Leak Monitoring								
Cover Vented to Control Device	1	5	5	45	225	11.25	22.5	$26,695.91
Closed Vent System	1	5	5	45	225	11.25	22.5	$26,695.91
e. Control Devices								
Performance Determination [c]	40	1	40	0	0	0	0	$0
Continuous Monitoring System	8	5	40	45	1,800	90	180	$213,567.30
f. LDAR Program								
Identify Affected Waste Streams [c]	40	1	40	0	0	0	0	$0
Perform Monitoring/Repair	80	1	80	45	3,600	180	360	$427,134.60
g. PRD monitoring								
Identification of PRD devices [c]	8	1	8	0	0	0	0	$0
Perform Monitoring/Repair	16	1	16	45	720	36	72	$85,427
D. Develop Record System [c]								
Control Equipment	16	1	16	0	0	0	0	$0
LDAR Program	40	1	40	0	0	0	0	$0
PRD Program	8	1	8	0	0	0	0	$0
E. Time to Enter Information								

Burden Items	(A) Person Hours per Occurrence	(B) No of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [b]	(E) Technical person hours per year (CxD)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total costs per year $ [a]
Cover Designs	40	1	40	0	0	0	0	$0
Control Device Design [c]	40	1	40	0	0	0	0	$0
Control Equipment Testing [c]	1	1	1	0	0	0	0	$0
Control Equipment Inspections [c]	1	1	1	45	45	2.25	4.5	$5,339.18
Control Equipment Monitoring	1	1	1	45	45	2.25	4.5	$5,339.18
Control Device CMS	1	52	52	45	2,340	117	234	$277,637.49
LDAR Program	4	16	64	45	2,880	144	288	$341,707.68
PRD Program	2	16	32	45	1,440	72	144	$170,853.84
Off-site Material Determinations	1	52	52	45	2,340	117	234	$277,637.49
F. Time to Train Personnel [c]								
Waste Determination Methods	40	1	40	0	0	0	0	$0
Control equipment inspect and monitor	40	1	40	0	0	0	0	$0
LDAR Program	8	1	8	0	0	0	0	$0
PRD Program	8	1	8	0	0	0	0	$0
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements					**39,592**			**$4,084,830**
TOTAL ANNUAL BURDEN AND COSTS (rounded): [j]					**40,600**			**$4,190,000**
Capital and O&M Cost (see Section 6(b)(iii)): [j]								**$874,000**
TOTAL COST: [j]								**$5,060,000**

Assumptions:

[a] This ICR uses the following labor rates: Managerial $138.43 ; Technical $106.45; and Clerical $52.77. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “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.

[b] We have assumed that there are approximately 45 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

[c] This activity is performed once during the year following promulgation of the rule.

[d] It is assumed that it will take 4 hours to read instructions.

[e] It is assumed that it will take 8 hours to gather existing information.

[f] It is assumed that there will be no new sources.

[g] The burden of one annual summary report was included in the burden estimate for the semiannual report.

[h] It is assumed that 50 percent of the facilities, the owner or operator manages, for a fee, off-site materials received from other generators.

[i] It is assumed that 50 percent of the owners or operators accept the off-site material at another location and ship it to the facility for storage, treatment, or disposal.

[j] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Operations (40 CFR Part 63, Subpart DD) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/ Year	(C) EPA Hours/ Year (AxB)	(D) Plants/ Year [b]	(E) Technical Hours/ Year (CxD)	(F) Managerial Hours/ Year (Ex0.05)	(G) Clerical Hours/ Year (Ex0.1)	(H) Costs, $ [a]
Report Review								
New Plants [c, d]								
Initial notification	2	1	2	0	0	0	0	$0
Performance test notification	1	1	1	0	0	0	0	$0
Compliance status notification	4	1	4	0	0	0	0	$0
Performance test report [e]	16	1	16	0	0	0	0	$0
Existing Plants								
Startup/shutdown report	See Semiannual Summary Report							
Semiannual summary report [f]	4	2	8	45	360	18	36	$19,225
TOTAL ANNUAL BURDEN AND COST (rounded) [g]					**414**			**$19,200**

Assumptions:

[a] This ICR uses the following labor rates: Managerial $64.16; Technical $47.62; and Clerical $25.76. These rates are from the Office of Personnel Management (OPM), 2016 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.

[b] We have assumed that there are approximately 45 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years

[c] There will be no travel expenses associated with this ICR since we have assumed that no new sources will become subject to this rule over the three-year period of this ICR.

[d] It is assumed that there will be no new sources over the three year period of this ICR.

[e] It is assumed that it will take 16 hours to review each performance test report.

[f] It is assumed that each facility will take 4 hours twice a year to submit report.

[g] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.