

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO)
(Renewal), EPA ICR Number 1869.10, OMB Control Number 2060-0434

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) were proposed on December 14, 1998, promulgated on January 20, 2000, and most recently-amended on October 8, 2014. These regulations apply to existing facilities and new facilities that engage in the manufacture of amino/phenolic resins with HAP emissions points that include: (1) reactor batch process vents; (2) nonreactor batch process vents; (3) continuous process vents; (4) equipment leaks; (5) wastewater; (6) storage vessels; and (7) heat exchangers. The 2014 amendment requires new facilities subject to this rule to comply with more stringent vessel size and vapor pressure thresholds for storage vessel control. The amendment also eliminates exemptions to emission limits and standards during periods of startup, shutdown, and malfunction, and requires all facilities to monitor atmospheric releases from pressure relief devices (PRD). New facilities include those that commenced construction or reconstruction after the date of proposal of the rule amendment. This information is being collected to assure compliance with 40 CFR Part 63, Subpart OOO.

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 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.

All of the amino/phenolic resin manufacturing facilities in the United States are owned and operated by the amino/phenolic resin manufacturing industry (aka: the "Affected Public"). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We

assume that they will all respond to EPA inquiries. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal). The “burden” to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

Over the next three years, approximately 19 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. The estimate of the size of the regulated universe is based on data from the National Emissions Inventory (NEI) database.

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, hazardous air pollutant (HAP) emissions from amino/phenolic resin manufacturing facilities 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 OOO.

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 and/or leaks are being detected and repaired and these 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 OOO.

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 265546) 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 these standards, 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 association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the American Coatings Association (ACA), or akeane@paint.org; and 2) the Technical Association of the Pulp and Paper Industry (TAPPI), or standards@tappi.org.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as to 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 (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 owners and operators of amino/phenolic resins manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2821, which corresponds to North American Industry Classification System (NAICS) 325211 for Plastic Material and Resin Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO).

A source must make the following reports:

Notifications/Reports	
Notification of intent to construct or reconstruct	63.5, 63.1417(d)
Notification and report of construction date	63.5, 63.1400(j)
Notification of anticipated startup	63.5, 63.1400(j)
Actual startup notification	63.5, 63.1400(j)
Notification of modification	63.5, 63.1400(j)
Notification and report of performance tests and results	63.7 (b), 63.1417(e)
Pre-compliance report	63.1417(d)
Notification and report of compliance status	63.1417(e)
Periodic reports (semiannual) including statement of compliance (if no exceedances occurred), daily, hatch cycle, and block average	63.1417(f)

Notifications/Reports	
monitoring data for any periods where exceedances or excursions occur, periods of monitoring system downtime.	
Quarterly reports upon request of the Administrator	63.1416(f)(12)
Malfunction reports	63.1417(g)
Notification of storage vessel inspection	63.1417(h)(1)
Site-specific test plan	63.1417(h)(2)
Notification of planned performance test	63.1417(h)(3)
Notification of change in primary product	63.1417(h)(4), 63.1400(g)(7-8)
Notification of added emission points	63.1417(h)(5)
Notification that a small control device has been re-designated as a large control device.	63.1417(h)(6)
Notification of process change	63.1417(h)(7)

A source must keep the following records:

Recordkeeping	
Five-year retention of records	63.1416(a)
Malfunction records	63.1416(b), 63.6
Monitoring records	63.1416(c)
Batch process vent records	63.1416(d)
Aggregate batch vent stream records	63.1416(e)
Continuous process vent records	63.1416(f)
Other records or documentation	63.1416(g)
Reduced recordkeeping program	63.1416(h)

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. Electronic reporting of performance test results, including fuel analyses, for data collected using test methods supported by the EPA-provided software by direct computer-to-computer electronic transfer via the software.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pH, flow, temperature, or specific gravity, or organic monitoring device for control options as applicable.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 308, 316, or 320 tests, 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.

Agency Activities
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 Final Rule (65 FR 3276):

We have determined that, of the nineteen affected firms, only six are small businesses Although this final rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has tried to reduce the impact of this rule on small entities. In order to minimize the impact of the rule for leaking equipment, we have exempted firms producing less than 881 tpy (800 Mg/yr) from complying with the requirements to have a leak detection and repair program.

Therefore, this ICR estimates approximately 30 percent of respondents, or 6 of the 19 respondents, may be small entities. 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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 neither conduct nor 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 23,300 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation and 2014 amendment, 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 standards 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.

(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	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
pH Monitor	\$1,000	0	\$0	\$300	19	\$5,700
Liquid Flow Monitor	\$500	0	\$0	\$100	19	\$1,900
O&M	\$0	0	\$0	\$1,505	19	\$28,595
Continuous process vent control systems ^a	\$1,206,621	0	\$0	\$287,408	3	\$862,224
Monitoring equipment	\$21,919	0	\$0	\$3,121	19	\$59,299
Total^b			\$0			\$958,000

^a We assume that there are 19 facilities in the Amino/Phenolic Resins category, however only 3 facilities are expected to operate emissions controls for continuous process vents due to use of carbon adsorption systems. We assumed that facilities are in compliance with the 2014 rule amendments and therefore there are no capital costs under this ICR renewal.

^b Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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 \$958,000. 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 \$958,000. These are the 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 \$17,500.

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 Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 19 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 19 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	19	0	0	19

Number of Respondents					
2	0	19	0	0	19
3	0	19	0	0	19
Average	0	19	0	0	19

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 19.

The total number of annual responses per year is calculated using the following table:

^a We assume that 5 percent of the initial tests will be repeated during each successive year.

The number of Total Annual Responses is 115.

The total annual labor costs are \$2,400,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 23,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 203 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$958,000. 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 377 labor hours at a cost of \$17,500. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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 an adjustment increase in the total estimated burden and capital and O&M costs as currently identified in the OMB Inventory of Approved Burdens. This increase is due to recent amendment to these standards. The 2014 amendment requires additional reporting, record-keeping, and equipment monitoring requirements, resulting in an increase in burden and costs for the regulated universe.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 203 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-2013-0338. 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-2013-0338 and OMB Control Number 2060-0434 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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)

Burden Item	(A) Respondent Hours Per Occurrence	(B) Number of Occurrences per Respondent per year	(C) Hours per Respondent Per Year (C=AxB)	(D) Number of Respondents per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Managerial Hours Per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^{c, d}	16	1	16	19	304	15.2	30.4	\$36,069.14
B. Plan activities	8	1	8	19	152	7.6	15.2	\$18,034.57
C. Training	16	1	16	19	304	15.2	30.4	\$36,069.14
D. Create, test and research development ^{e, f}	320	1	320	1	320	16	32	\$37,967.52
E. Gather, monitor and inspect information	208	1	208	19	3,952	197.6	395.2	\$468,898.87
F. Process, compile and review	48	2	96	19	1,824	91.2	182.4	\$216,414.86
G. Write Report								
1) Pre-compliance report	20	1	20	0	0	0	0	\$0
2) Notification of compliance status	20	1	20	0	0	0	0	\$0
3) Semiannual summary report ^g	40	2	80	19	1,520	76	152	\$180,345.72
4) Reports of malfunctions	20	2	40	19	760	38	76	\$90,172.86
5) Other reports	8	2	16	19	304	15.2	30.4	\$36,069.14
6) Leak detection and repair (LDAR) reporting	60	1	60	19	1,140	57	114	\$135,259.29
Subtotal for Reporting Requirements						12,167		\$1,255,301

4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements ^{c, d}	See 3A							
B. Plan activities	See 3B							
C. Implement activities								
1) Malfunction records	6	2	12	19	228	11.4	22.8	\$27,051.86
2) Monitoring records	24	2	48	19	912	45.6	91.2	\$108,207.43
3) Batch process vent records	24	2	48	19	912	45.6	91.2	\$108,207.43
4) Aggregate batch vent stream records	24	2	48	19	912	45.6	91.2	\$108,207.43
5) Leak detection and repair (LDAR) records	24	2	48	19	912	45.6	91.2	\$108,207.43
6) Other records and documentation	24	2	48	19	912	45.6	91.2	\$108,207.43
D. Develop record system								
1) Record/disclose information	16	2	32	19	608	30.4	60.8	\$72,138.29
2) Store, file, maintain information ^h	4	2	8	19	152	7.6	15.2	\$18,034.57
E. Time to enter information								
1) Malfunction records	4	2	8	19	152	7.6	15.2	\$18,034.57
2) Monitoring records	4	2	8	19	152	7.6	15.2	\$18,034.57
3) Batch process vent records	4	2	8	19	152	7.6	15.2	\$18,034.57
4) Aggregate batch vent stream records	4	2	8	19	152	7.6	15.2	\$18,034.57
5) Leak detection and repair (LDAR) records	4	2	8	19	152	7.6	15.2	\$18,034.57
6) Other records and documentation	8	2	16	19	304	15.2	30.4	\$36,069.14
F. Time to train personnel								
1) Control equipment inspect and monitor	40	2	80	19	1,520	76	152	\$180,345.72
2) Leak detection and repair	40	2	80	19	1,520	76	152	\$180,345.72
G. Time for audits	N/A							

<i>Subtotal for Recordkeeping Requirements</i>									11,100	\$1,145,195
TOTAL LABOR BURDEN AND COST (rounded) ⁱ									23,300	\$2,400,000
TOTAL CAPITAL AND O&M COST (rounded) ⁱ										\$958,000
GRAND TOTAL (rounded) ⁱ										\$3,360,000

Assumptions:

^a This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject over the next three years.

^b 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.

^c This ICR assumes that all respondents will have to familiarize with the regulatory requirements each year.

^d We assume that it will take 16 hours for each respondent to familiarize with regulatory requirements.

^e Initial performance testing was assumed to take 280 technical hours (1 test leader for two weeks and 5 feet crew for one week), with an additional 40 hours for the establishment of parameter monitoring levels for a total of 320 respondent hours per occurrence.

^f We assume that 5 percent of the initial tests will be repeated during each successive year.

^g We assume that it will take each respondent 40 hours two times per year to complete reports (semiannual reporting).

^h We assume that it will take 4 hours two times per year to gather monitoring information and maintain monitoring equipment.

ⁱ Totals have been rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)

Activity	(A) EPA Hours Occurrence	(B) Occurrences Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=E \times 0.05)	(G) Clerical Hours per Year (G=E \times 0.1)	(H) Costs, \$ ^b
Initial performance test	N/A							
Repeat performance test ^c	20	1	20	1	20	1	2	\$1,068.08
Report review								
a) Notification of construction/reconstruction	N/A							
b) Notification of anticipated startup	N/A							
c) Notification of actual startup	N/A							
d) Notification of modification	N/A							
e) Notification of compliance status	N/A							
f) Notification of performance test ^d	4	1	4	1	4	0.2	0.4	\$213.62
g) Notification of process change	N/A							
h) Notification of inspection of storage vessel	N/A							
i) Notification of change in primary product	N/A							
j) Pre-compliance report	N/A							
k) Storage vessel initial compliance demonstration	N/A							
l) Periodic reports of compliance status ^e	4	2	8	19	152	7.6	15.2	\$8,117.41
m) Semiannual summary report	2	2	4	19	76	3.8	7.6	\$4,058.70
n) Reports of malfunctions	2	2	4	19	76	3.8	7.6	\$4,058.70
TOTAL ANNUAL BURDEN AND COST (rounded) ^f						377		\$17,500

Assumptions:

- ^a This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject over the next three years
- ^b We assumed a technical labor rate of \$47.62, managerial rate \$64.16, and clerical rate of \$25.76 from the United States Department of Labor. 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. These rates can be obtained from the OPM web site, <http://www.opm.gov/oqa/payrates/index/htm>.
- ^c We assume that it would take 20 hours once per year for respondent to complete repeat performance test.
- ^d We assume that it will take four hours once per year for respondent to review the notification of performance test report.
- ^e We assume that it will take 4 hours 80 times per year for respondent to review the periodic report of compliance status.
- ^f Totals have been rounded to three significant figures. Figures may not add exactly due to rounding.