

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal),
EPA ICR Number 1811.10, OMB Control Number 2060-0415.

1(b) Short Characterization/Abstract

The NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) were proposed on September 4, 1997, promulgated on June 1, 1999, and most-recently amended on March 27, 2014. The amendments require respondents to monitor each pressure relief device (PRD) in organic hazardous air pollutant (HAP) service and to report any PRD releases to the atmosphere with the next periodic report. These regulations apply to new and existing facilities that engage in the manufacture of polyether polyols (including polyether mono-ols) and emit hazardous air pollutants (HAPs). Owners or operators of polyether polyols production facilities to which this regulation applies must choose one of the compliance options described in the rule or install and monitor a specific control system that reduces HAP emissions to the compliance level. Respondents are also subject to sections of 40 CFR Part 63, Subpart A. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart PPP.

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.

The “Affected Public” applies to owners and operators of polyether polyols production facilities. None of these facilities are owned by either state, local, tribal, or the Federal government. They are all privately-owned, commercial businesses. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal). There are approximately 23 polyether polyols production facilities, which are owned and operated by the polyether polyols production industry. We assume that they will all respond to EPA requirements.

Over the next three years, approximately 23 respondents per year will be subject to these standards, and no additional respondents are expected to become subject to these same standards.

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 polyether polyols production 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 PPP.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensures 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 these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 is 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 the standard is 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 PPP.

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. Approximately 23 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Society of Chemical Manufacturers and Affiliates, at (202) 296-8120, and the American Chemistry Council, at (202) 249-7000.

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 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 these 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 these standards 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 polyether polyols production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2869 which corresponds to the North American Industry Classification System (NAICS) 325199 for All Other Basic Organic Chemical 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP).

A source must make the following reports:

Notifications and Reports	
Notification of applicability	63.9(a)
Notification of construction/reconstruction	63.5(d)(1) (i and ii), 63.1439(b)(2)
Initial notifications, including startup	63.1439(e)(3)
Notification of compliance status	63.1430(g), 63.1439(e) (5)
Notification of performance test	63.1437(a)
Notification of inspections	63.1439(e)(7)(i)
Periodic reports	63.1430(h), 63.1439(e) (6)
PRD requirements for period reports	63.1434(c)(3)(ii) 63.1434(f)
Reports of process changes	63.1420(g)(4), 63.1430(i), 63.1430(j),

Notifications and Reports	
	63.1439(e)(7) (ii and iii)
Alternative request to use devices other than those specified in the process vent monitoring requirements	63.1430(k)
Reports of malfunctions	63.1439(b)(1)(ii)
Equipment leak reporting	63.1439(c)
Pre-compliance report	63.1439(e)(4), 63.1439(e)(8), 63.1439(f and g)
Performance test results	63.7(g), 63.1439(e)(9)

A source must keep the following records:

Recordkeeping	
Records of applicability	63.10(b)(3), 63.1420(e)
Records to demonstrate process vent control compliance	63.1430(b)
Records related to establishment of parameter monitoring levels	63.1430(c)
Records to demonstrate continuous compliance	63.1430(d)
Records related to group determination for process vents associated with use of non-epoxide organic HAP to make or modify the product	63.1430(e)
Records for Group 2 process vents associated with use of non-epoxide organic HAP to make or modify the product	63.1430(f)
Records retention for five years	63.1439(a)
Records of malfunctions	63.1439(b)(1)
Equipment leak records	63.1439(c)
Continuous monitoring records, including records of PRD releases to atmosphere	63.1439(d)

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.

The 2014 amendment requires respondents to submit electronic copies of applicable reports of performance tests to the EPA's WebFIRE database through an electronic emissions

test report structure called the Electronic Reporting Tool (ERT). This requirement to submit performance test data electronically to the EPA does not require any additional performance testing, and applies only to those performance tests conducted using test methods that are supported by the ERT.

(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 the appropriate 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 standard 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

There are no small entities (i.e., small businesses) affected by this regulation. However, 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 recordkeeping and reporting requirements is estimated to be 3,710 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance (O&M) costs. We expect that all existing sources have already incurred initial, one-time costs associated with these standards. In addition, we expect ongoing O&M cost to be negligible.

(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)
Process vent monitoring equipment ^{1,2}	\$9,385	0	\$0	\$0	23	\$0
PRD electronic indicators ^{1,3}	\$69,233	0	\$0	\$0	23	\$0
Total			\$0			\$0

¹ Annual O&M costs are estimated to be negligible, and are therefore assumed to be zero.

² We assume existing facilities have already paid off the process vent monitoring equipment.

³ Existing sources must install PRD monitoring equipment within three years of the final amendment date (March 27, 2014). EPA assumes that all existing facilities have already installed PRD monitoring equipment.

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance 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 \$5,130.

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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 23 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 23 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	23	0	0	23
2	0	23	0	0	23
3	0	23	0	0	23
Average	0	23	0	0	23

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 23.

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
Notification of applicability	0	0	0	0
Notification of construction/ reconstruction	0	0	0	0
Notification of actual startup	0	0	0	0
Initial notification	0	0	0	0
Performance test notification	0	0	0	0
Compliance status notification	0	0	0	0
Performance test reports	0	0	0	0
Malfunction reports	0	0	0	0
Semiannual summary report	23	2	0	46
Notification of physical/ operational change	2	1	0	2
PRD reporting ¹	23	0	0	0
			Total	48

¹ Annual occurrences of PRD reporting are not counted as separate responses because they are required to be submitted with the semiannual reports.

The number of Total Annual Responses is 48.

The total annual labor costs are \$383,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (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 3,710 hours at a cost of \$383,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of

information is estimated to average 77 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 110 labor hours at a cost of \$5,130. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

6(f) Reasons for Change in Burden

There is a small increase in labor hours in this ICR compared to the previous ICR. This is due to the removal of affirmative defense and the addition of a one-hour estimate associated with re-familiarization in the regulatory requirements for each regulated source.

There is also a decrease in the total capital and O&M costs. Since all existing sources are expected to be compliant with any initial requirements of the 2014 rule, the estimated capital cost has decreased since the last ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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-2014-0063. 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-2014-0063 and OMB Control Number 2060-0415 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	23	23	1.2	2.3	\$2,728.92
B. Required activities								
i. Initial performance test: process vents	N/A							
ii. Initial performance test: wastewater	N/A							
C. Write reports								
i. Notification of applicability	N/A							
ii. Notification of construction/reconstruction	N/A							
iii. Notification of actual startup	N/A							
iv. Initial notification	N/A							
v. Performance test notification	N/A							
vi. Compliance status notification	N/A							
vii. Performance test report	N/A							
viii. Malfunction report	2	1	2	0	0	0	0	\$0
ix. Semiannual summary report	20	2	40	23	920	46	92	\$109,156.62
x. Notification of physical/operational change ^c	2	1	2	2	4	0.2	0.4	\$474.59
xi. PRD reporting in semiannual report	5.5	2	11	23	253	12.65	25.3	\$30,018.07
Subtotal for Reporting Requirements						1,380		\$142,378
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	N/A							

B. Develop record system	N/A							
C. Time to train personnel	N/A							
D. Continuously monitor parameters	See 3C							
E. LDAR program	88	1	88	23	2,024	101.2	202.4	\$240,144.56
F. Startup, shutdown, malfunction plan	N/A							
Subtotal for Recordkeeping Requirements^d						2,327		\$240,145
TOTAL ANNUAL BURDEN AND COST (Rounded)^d						3,710		\$383,000
Capital and O&M Costs (See Section 6(b)(iii))^d								\$0
TOTAL COST (Rounded)^d						3,710		\$383,000

Assumptions:

^a EPA estimates an average of 23 existing sources will be subject to the NESHAP over the next 3 years. No new sources are expected to become subject over the three-year ICR period.

^b This ICR uses the following labor rates: \$106.45 (technical), \$138.43 (managerial), and \$52.77 (clerical). 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." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c EPA assumes 10% of existing sources will submit notifications of physical/operational change ($23 \times 10\% = 2.3$, or 2 after rounding).

^d 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 Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual Cost ^b
Review notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Review notification of actual startup	2	1	2	0	0	0	0	\$0
Review initial notification report	8	1	8	0	0	0	0	\$0
Review notification of performance test	4	1	4	0	0	0	0	\$0
Review notification of compliance status	10	1	10	0	0	0	0	\$0
Review performance test results	10	1	10	0	0	0	0	\$0
Malfunction report	2	1	2	0	0	0	0	\$0
Review semiannual summary reports	2	2	4	23	92	4.6	9.2	\$4,913.17
Review notification of physical/operational change	2	1	2	2	4	0.2	0.4	\$213.62
TOTAL ANNUAL BURDEN AND COST (ROUNDED) ^c					110			\$5,130

Assumptions:

^a EPA estimates an average of 23 existing sources will be subject to the NESHAP over the next 3 years. No new sources are expected to become subject over the three-year ICR period.

^b This ICR uses the following labor rates: \$47.62 (technical), \$64.16 (managerial), and \$25.76 (clerical). 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.

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