

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast
Manufacturing Residual Risk and Technology Review**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC), EPA ICR Number 2568.02, OMB Control Number 2060-NEW.

1(b) Short Characterization/Abstract

This supporting statement addresses information collection activities that will be imposed by amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Manufacturing of Nutritional Yeast, 40 CFR part 63, subpart CCCC, referred to in this document as the Nutritional Yeast NESHAP. In 2001, the U.S. Environmental Protection Agency (EPA) promulgated national emission standards for hazardous air pollutants for new and existing nutritional yeast production facilities under 40 CFR part 63, subpart CCCC (66 FR 27876, May 21, 2001) that apply to facilities where the total hazardous air pollutants (HAP) emitted are greater than or equal to 10 tons per year of any single HAP, or where the total HAP emitted are greater than or equal to 25 tons per year of any combination of HAP. The Nutritional Yeast NESHAP sets emission limits for fermenter operations at nutritional yeast manufacturing facilities.

Concurrent to the residual risk and technology reviews for the Nutritional Yeast NESHAP, the EPA finalized amendments that change the form of the current emission limits, require the use of volatile organic compound continuous emission monitoring systems (CEMS), require valid CEMS data from each hour of the batch monitoring period, require ongoing tests to evaluate the performance of the CEMS over time, require electronic reporting, and remove exemptions for malfunctions so that affected facilities would be subject to the emission standards at all times. This information collection request documents the recordkeeping and reporting requirements and burden imposed by the rule – both the requirements that were previously promulgated and retained, as well as the final amendments.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance and are required of all affected facilities subject to NESHAP. This ICR includes the burden for all activities that will be conducted in the first three years following promulgation of the amendments to the Nutritional Yeast NESHAP. These activities include reading the rule, installing and maintaining CEMS, performing relative accuracy test audits (RATA) of the CEMS, and completing the monitoring, recordkeeping, and reporting requirements.

Any owner/operator subject to the provisions of the Nutritional Yeast NESHAP shall maintain a file of these notifications, reports, and records, and retain the file for at least five years. All reports are sent to the delegated state or local authority. In the event there is no such delegated authority, the reports are sent directly to the EPA regional office. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

This ICR presents the burden to respondents and the Designated Administrator (State or Federal Government) that will be imposed by the plans developed to implement the Nutritional Yeast NESHAP. Respondents are owners or operators of existing major source nutritional yeast manufacturing facilities. The requirements described below are the minimum requirements established by the Nutritional Yeast NESHAP. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the Nutritional Yeast NESHAP.

Over the next 3 years, 4 nutritional yeast manufacturing facilities will be subject to the Nutritional Yeast NESHAP per year, and the total labor, capital, and operations and maintenance costs of this ICR will be approximately \$808,000 per year for the first 3 years after the amendments are finalized. The burden to the respondents from each facility may be found in Table 1.

The four existing nutritional yeast manufacturing facilities are located in 3 states, which are represented by 3 separate EPA regional offices. The total average annual cost to these 6 Designated Administrators during the 3 years of the ICR is estimated to be \$9,500 per year. This burden includes labor costs for the Federal EPA and state and local authorities to implement the requirements in the Nutritional Yeast NESHAP. This burden may be found in Table 2.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under CAA Section 112, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of HAP. These standards are applicable to new or existing sources of HAP and require the maximum degree of emission reduction. In addition, CAA 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 nutritional yeast manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for major sources in this source category at 40 CFR part 63, subpart CCCC.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting information will be used by Designated Administrators to 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.

Continuous emission monitors are used to ensure compliance with the emission standards at all times. RATAs are used to verify the ongoing performance of the emission monitors.

The required notifications are used to inform the Designated Administrator when a source becomes subject to the requirement of the regulations. The reviewing authority may then inspect the source to ensure that continuous emission monitors are properly installed and operated, process controls are used on fermentation units, and the emission standards are being met.

The required semiannual reports and records are used to determine periods of excess emissions, identify problems at the facility, verify operation and maintenance procedures, and determine compliance.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting activities will be required under 40 CFR part 63, subpart CCCC.

3(a) Nonduplication

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, no duplication exists.

3(b) Public notice prior to ICR submission to OMB

A public notice of this collection was provided in the Federal Register notice of proposed

rulemaking published for the *National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review*. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The public was provided the opportunity to review and comment on the burden estimated in this Information Collection Request during the comment period for the proposed rulemaking. In addition, consultations with representatives of each company involved with nutritional yeast manufacturing that are subject to the current Nutritional Yeast NESHAP and the Delegated Authorities for these facilities were conducted throughout the residual risk and technology review process. Finally, industry meetings were held with the nutritional yeast manufacturing companies and the American Bakers Association on February 2, 2017, and July 11, 2017 (via teleconference).

3(d) Effects of Less Frequent Data Collection

The Nutritional Yeast NESHAP requires continuous monitoring of VOC emissions and semiannual compliance reports. These periodic reports are essential to enforcement of the emission limitations and detection of violations. The ongoing recordkeeping requirements also ensure that emission monitoring equipment is properly maintained and enhances the reliability of the data that is gathered for this collection.

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.

This rule requires all records to be maintained at the source for a period of five years. In 40 CFR part 63, subpart A, "General Provisions for National Emission Standards for Hazardous Air Pollutants for Source Categories," owners or operators of facilities are required to keep and maintain records for a period of five years. The title V permit programs also require records to be retained for five years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

3(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in 40 CFR 2, subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 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/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of new or existing major source nutritional yeast manufacturing facilities. This includes, but is not limited to, North American Industry Classification System (NAICS) Code 311999, "All Other Miscellaneous Food Manufacturing."

4(b) Information Requested

(i) Data Items

In this ICR, all data that is recorded or reported is required by the Nutritional Yeast NESHAP (40 CFR, part 63, subpart CCCC). The tables below reflect the final requirements after promulgation of the amendments.

Owners/operators of nutritional yeast manufacturing facilities must make the following reports:

Reporting	
Notification of construction and modification	63.5(d)
Initial notification for sources	63.9(b)-(d)
Performance evaluation plan; notification of performance evaluation; and results of performance evaluation (for facilities that use CEMS to monitor emissions)	63.7(c), 63.8(e) & (f)(4) & (f)(6), 63.9(g), 63.2180(d), 63.2181(a)(1)
Performance test plan; notification of performance test; and results of performance test (for facilities that estimate emissions using brew ethanol monitors)	63.7(b), 63.7(g)(1), 63.9(e), 63.2180(c) & (e), 63.2181(a)(1)
Request for alternative monitoring procedures or alternatives to RATA	63.8(f)(4) and (6)
Notification of compliance status	63.9(h), 63.2180(f)
Semiannual compliance report	63.2181(c)

Owners/operators of nutritional yeast manufacturing facilities must keep the following records:

Recordkeeping	
Each notification and report	63.10(b)(2)(xiv) 63.2182(a)(1)
Records of failures to meet a standard	63.2182(a)(2)
Performance test and performance evaluation records	63.10(b)(2)(viii) & (ix) 63.2182(a)(3)
Records of the calculation of brew-to-exhaust correlations	63.2182(b)
Monitoring records (from CEMS and brew ethanol monitors)	63.8(d)(3) 63.10(b)(2)(vi) & (x)-(xi) 63.2182(c)
Continuous compliance data and calculations	63.2182(d)
Fermentation and batch data	63.2182(e)
Retention of records	63.10(b)(1), 63.2183

Electronic Reporting

Regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) or performance evaluations of continuous monitoring systems measuring pollutants that are supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, respondents must submit the results of the performance test/evaluation to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI).

Any records required to be maintained by this NESHAP that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.

(ii) Respondent Activities

Owners/operators of nutritional yeast manufacturing facilities who monitor emissions with CEMS must perform the following activities:

- Read the rule.
- Calibrate, operate and record measurements from CEMS.
- Submit notification of, conduct, and report results from performance evaluations once every 3 years.
- Submit semiannual compliance reports.
- Keep records identifying each batch and the applicable CEMS.
- Develop records demonstrating continuous compliance.

- Record failures to meet a standard and deviations from monitoring system requirements.
- Develop and maintain CEMS QC program, including the performance evaluation test plan and the program of corrective action for a malfunctioning CEMS.
- Develop/update recordkeeping systems and train personnel on their use.

Owners/operators of nutritional yeast manufacturing facilities who monitor emissions with brew ethanol monitors must perform the following activities:

- Read the rule.
- Calibrate, operate and record measurements from brew ethanol monitors.
- Submit notification of, conduct, and report results from annual performance tests.
- Submit annual notification of compliance status.
- Submit semiannual compliance reports.
- Keep records identifying each batch and the applicable CEMS.
- Develop records demonstrating continuous compliance.
- Record failures to meet a standard and deviations from monitoring system requirements.
- Develop and maintain QC program.
- Develop/update recordkeeping systems and train personnel on their use.

Currently, sources are using monitoring and reporting equipment that provide automated data for emissions or a related factor. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION, METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

- Review notifications, including notifications of construction/reconstruction, actual startup, performance tests, performance evaluations, and compliance status.
- Observe annual performance tests.
- Review the reports that are required to be submitted by industry, including performance test reports, performance evaluation reports, and semiannual compliance reports.
- Review QA/QC plans, performance test/evaluation plans, and requests for alternative monitoring or test methods.

5(b) Collection Methodology and Management

Upon promulgation of the amendments, facilities will be required to monitor emissions using continuous monitoring systems, use the data for monthly compliance determinations, and report their compliance status semi-annually. Notifications and the reports of results from

performance tests are also required. The data obtained during periodic visits by the EPA, from records maintained by the respondents, and from information provided in reports will be used in compliance and enforcement programs. The Nutritional Yeast NESHAP allows records to be retained in hardcopy or electronic format to allow flexibility and minimize burden.

Information contained in the reports is entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for regulated facilities nationwide. The EPA uses ECHO for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

Owners or operators of nutritional yeast manufacturing facilities must comply with the reporting and recordkeeping requirements upon promulgation of the amendments (expected in October 2017). Facilities currently monitoring emissions with CEMS will be required to maintain these requirements while the facility that currently monitors emissions using brew ethanol monitors has up to 3 years to transition to the use of CEMS.

All facilities must submit semiannual compliance reports.

All facilities must conduct the following activities on an annual basis:

- Calibrate, operate, maintain and record measurements from emissions monitoring systems.
- Keep records identifying each batch and the applicable emissions monitoring equipment.
- Demonstrate continuous compliance with the NESHAP requirements.
- Store, file and maintain required records.

Additionally, facilities that monitor emissions using brew ethanol monitors must conduct the following activities on an annual basis:

- Submit notification of, conduct, and report results of performance tests.
- Submit notification of compliance status.
- Calculate the brew-to-exhaust correlation.

Facilities that monitor emissions using CEMS must conduct the following activities once every 3 years:

- Submit notification of, conduct, and report results of performance evaluation.

All facilities must conduct the following activities once and repeat as needed:

- Read the rule.
- Develop a QC program.
- Train personnel on monitoring, reporting and recordkeeping systems and requirements.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Table 1 presents an itemization of the average annual burden on the nutritional yeast manufacturing facilities subject to the Nutritional Yeast NESHAP for the recordkeeping and reporting requirements following promulgation of the amendments to the Nutritional Yeast NESHAP. Table 2 presents a summary of the average annual burden on the EPA and delegated authorities following promulgation of the amendments to the Nutritional Yeast NESHAP.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next 3 years from these recordkeeping and reporting requirements is estimated to be 1,370 hours (Total Labor Hours from Table 1). The EPA estimated these hours based on the review of background documents and information gathered during the development of the amendments to the Nutritional Yeast NESHAP, as well as Agency knowledge and experience with the NESHAP program.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates for the burden to nutritional yeast manufacturing facilities:

Managerial (General and Operations Managers)	\$131.46 (\$62.60 + 110%)
Technical (Engineers)	\$84.40 (\$40.19 + 110%)
Clerical (Information and Record Clerks)	\$36.18 (\$17.23 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2016, "National Industry-Specific Occupational Employment and Wage Estimates, NAICS 311900." The rates are from column 8, mean hourly wage. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operation and Maintenance Costs

In addition to the labor costs mentioned above, industry costs associated with the information collection activities in the Nutritional Yeast NESHAP include capital costs and operation and maintenance costs. The capital costs are one-time costs for a facility to comply with amendments to the regulation and include the installation of CEMS. The annual operation and maintenance costs are the ongoing costs to maintain the monitoring systems and complete

performance tests and evaluations. We have assumed that recordkeeping and reporting will be conducted electronically using existing computer equipment; therefore, no costs have been estimated for materials for these activities.

(iii) Capital and Operation and Maintenance (O&M) Costs

Below are the estimated annualized capital costs and average annual O&M costs for owners/operators of nutritional yeast manufacturing facilities after promulgation of the amendments to the rule. The average annual capital and O&M costs for all facilities for this ICR are \$695,000. Annualized capital costs were calculated based on 2015 dollars using an equipment life of 10 years and a 7 percent discount rate. Operations and maintenance costs are presented as the average of the annual costs that are estimated to be incurred by each facility. To present an annual cost for the performance evaluations, which are only required once every 3 years, the average cost expected to be incurred in a given year was divided by 3.

Compliance Monitoring Activities	Capital/Startup Costs	O&M Costs
Install CEMS ^a	\$86,770	--
Conduct performance tests ^a	--	\$19,500
Monitor VOC emissions	--	\$186,860
Conduct performance evaluations	--	\$7,070

^a These costs are incurred by one facility

6(c) Estimating Agency Burden and Cost

The costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the nutritional yeast manufacturing facilities, periodic inspection of sources of emissions, and the publication and distribution of collected information.

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

Managerial	\$74.56 (GS-13, Step 5, \$46.60+ 60%)
Technical	\$55.33 (GS-12, Step 1, \$34.58+ 60%)
Clerical	\$29.94 (GS-6, Step 3, \$18.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, "Rest of the United States". The rates have been increased by 60 percent to account for the benefit packages available to government employees.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on site visits and research conducted for this rule, four facilities are subject to the Nutritional Yeast NESHAP. No new respondents will become subject to this rule due to the amendments. Based on the consultations conducted for the rule, the EPA estimates that 1 facility currently monitors compliance using brew ethanol monitors and 3 facilities currently monitor compliance using CEMS. Therefore, 1 facility will conduct annual performance tests with the

associated reporting and recordkeeping requirements and will incur capital costs to purchase and install CEMS. All 4 facilities will be required to conduct performance evaluations with the associated reporting and recordkeeping requirements, as part of ongoing requirements for the 3 facilities currently using CEMS and as part of the initial installation for the facility that must transition to CEMS. All 4 facilities will also perform ongoing monitoring activities to support annual reporting and recordkeeping requirements and submit semiannual compliance reports.

6(e) Bottom Line Burden Hours and Cost Tables

(i) The Respondent Tally

The total annual labor hours for respondents are approximately 1,370 at a cost of \$113,000. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 380 hours per respondent. Details regarding these estimates may be found in Table 1.

The total annual capital/startup and O&M costs to the regulated entities are \$695,000. The cost calculations are detailed in Section 6(b)(iii), Capital and Operation and Maintenance Costs.

Number of Respondents	Total Annual Hours	Total Annual Labor Costs	Total Annual Capital Costs	Total Annual O&M Costs
4	1370	\$113,000	\$87,000	\$608,000

(ii) The Agency Tally

The average annual burden over the first three years for the Agency is estimated to be 175 hours at a cost of \$9,500. The itemization of Agency burden hours and costs is presented in Table 2.

Number of Respondents	Total Annual Hours	Total Annual Labor Costs
6	175	\$9,500

6(f) Reasons for change in burden

There is no change in the labor hours or cost in this ICR as it presents the burden based on the total requirement of, including final amendments to, the Nutritional Yeast NESHAP and is considered new burden.

6(g) Burden Statement

Table 1 presents the average annual burden for each nutritional yeast manufacturing facility. For nutritional yeast manufacturing facilities, the average burden is expected to be 380 hours per year. This estimate includes time for preparation and submittal of notices and reports related to monitoring emissions of hazardous air pollutants from these facilities.

Burden means 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 currently valid OMB control number. The OMB Control Numbers for EPA regulations are listed in 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2015-0730. 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), EPA 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) 566-1927. 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-OAR-2015-0730 and OMB Control Number 2060-NEW in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

Table 1: Annual Respondent Burden and Cost

INFORMATION COLLECTION ACTIVITY	Hours and Cost Per Respondent Per Year							Total Hours and Costs Per Year				
	Mgmt \$131.46/ Hour	Tech \$84.40/ Hour	Cler \$36.18/ Hour	Total Resp. Hours/Year	Total Labor Cost/Year	Capital & Startup Cost/Year	O&M Cost/ Year	Number of Resp.	Total Hours/ Year	Labor Costs/Year	Non-Labor Costs/Year	Total Cost/ Year
Reading the Regulations												
Read the regulations	0.75	15	1.5	5.8	\$ 473			4	23.0	\$ 1,892	\$ -	\$ 1,892
Compliance Requirements												
<i>Brew ethanol monitors</i>												
Conduct performance test & determine brew ethanol correlation	1.5	30	3	34.5	\$ 2,838		\$ 19,500	1	34.5	\$ 2,838	\$ 19,500	\$ 22,338
VOC CEMS												
Install VOC CEMS						\$ 86,770		1		\$ -	\$ 86,770	\$ 86,770
Maintain VOC CEMS (average annual O&M costs)							\$ 186,860	3		\$ -	\$ 560,580	\$ 560,580
Conduct regular performance evaluation - RATA	0.4	8	0.8	3.1	\$ 252		\$ 7,070	4	12.3	\$ 1,009	\$ 28,280	\$ 29,289
Reporting Requirements												
<i>Performance Tests (for brew ethanol monitors)</i>												
Submit notification of performance test	0.05	1	0.1	1.2	\$ 95			1	1.2	\$ 95	\$ -	\$ 95
Report results of performance test	0.1	2	0.2	2.3	\$ 189			1	2.3	\$ 189	\$ -	\$ 189
<i>Performance Evaluations (for CEMS)</i>												
Submit notification of performance evaluation	0.1	2	0.2	0.8	\$ 63			4	3.1	\$ 252	\$ -	\$ 252
Report performance evaluation results	0.1	2	0.2	0.8	\$ 63			4	3.1	\$ 252	\$ -	\$ 252
Compliance Status												
Submit notification of compliance status (for brew ethanol monitors)	0.2	4	0.4	4.6	\$ 378			1	4.6	\$ 378	\$ -	\$ 378
Submit semiannual compliance reports	0.4	8	0.8	9.2	\$ 757			4	36.8	\$ 3,027	\$ -	\$ 3,027
Recordkeeping Requirements												
Keep records of each batch & applicable equipment	<i>included below</i>											
Develop records demonstrating continuous compliance	2.4	48	4.8	55.2	\$ 4,540			4	220.8	\$ 18,161	\$ -	\$ 18,161
Record failures to meet an emission standard	<i>included above</i>											
Record performance evaluation results	0.1	2	0.2	0.8	\$ 63			4	3.1	\$ 252	\$ -	\$ 252
Record performance test results and brew-to-exhaust correlation	0.1	2	0.2	2.3	\$ 189			1	2.3	\$ 189	\$ -	\$ 189
Record monitoring system measurements	8.75	175	17.5	201.3	\$ 16,553			4	805.0	\$ 66,214	\$ -	\$ 66,214
Record monitoring system inspection, calibration & validation checks	1.2	24	2.4	27.6	\$ 2,270			4	110.4	\$ 9,081	\$ -	\$ 9,081
Records of deviations from monitoring system requirements	<i>included above</i>											
Develop and maintain monitoring system QC program, including performance evaluation test plan and program of corrective action for malfunctioning CEMS	0.75	15	1.5	5.8	\$ 473			4	23.0	\$ 1,892	\$ -	\$ 1,892
Store, file and maintain records	0.6	12	1.2	13.8	\$ 1,135			4	55.2	\$ 4,540	\$ -	\$ 4,540
Acquire, install and train personnel on recordkeeping systems	1	20	2	7.7	\$ 631			4	30.7	\$ 2,522	\$ -	\$ 2,522
Totals									1371.2	\$ 112,784	\$ 695,130	\$ 807,914

Table 2: Annual Agency Burden and Cost

INFORMATION COLLECTION ACTIVITY	Frequency	Hours and Cost Per Respondent							Total Hours and Costs		
		Mgmt \$74.56/ Hour	Tech \$55.33/ Hour	Cler \$29.94/ Hour	Resp. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O&M Cost/ Year	Number of Resp.	Total Hours/ Year	Total Cost/ Year
Read the regulations	Once	0.75	15	1.5	5.8	\$ 310			6	34.5	\$ 1,862
Review notifications of construction/reconstruction and startup (none anticipated)	As needed								0		
Review notifications of performance tests	Annual	0.1	0.5	0.1	0.7	\$ 38			2	1.4	\$ 76
Review notifications of performance evaluations	Once every 3 years	0.1	0.5	0.1	0.2	\$ 13			6	1.4	\$ 76
Observe annual performance tests	Annual	0.75	15	1.5	17.3	\$ 931			2	34.5	\$ 1,862
Review performance test reports	Annual	0.25	5	0.5	5.8	\$ 310			2	11.5	\$ 621
Review performance evaluation reports	Once every 3 years	0.25	5	0.5	1.9	\$ 103			6	11.5	\$ 621
Review semiannual compliance reports	Twice per year	0.5	10	1	11.5	\$ 621			6	69.0	\$ 3,723
Review QC plans	Once (+ updates as needed)	0.25	5	0.5	1.9	\$ 103			6	11.5	\$ 621
Review requests for alternative monitoring or test methods (none anticipated)	As needed								0		
Totals		3	56	6	45	\$ 2,429				175	\$ 9,460