

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarization with the regulatory requirements ^a	1	1
B. Required activities ^c		
Basic liquid resins (BLR)	1,050	1
Repeat initial performance test - process vents	1,050	1
Initial performance test - wastewater	270	1
Repeat initial performance test – wastewater	270	1
Wet strength resins (WSR) ^d	270	1
C. Create information	See 3B, 4D, 4E	
D. Gather existing information	See 3B, 4D, 4E	
E. Write report		
Notification of construction/reconstruction ^c	2	1
Notification of physical/operational changes ^e	2	1
Notification of anticipated startup ^c	2	1
Notification of actual startup ^c	2	1
Notification of applicability of the standard – existing sources ^c	2	1
Notification of applicability of the standard – new sources ^c	2	1
Notification of initial performance test ^c	2	1
Report of initial test (including CMS performance evaluation and results) ^c	6	1
Submit quality control plan for CMS ^{c, f}	2	1
Submit startup, shutdown, malfunction plan ^c	2	1
Report of monitoring exceedances and periods of noncompliance ^g	16	4
Report of no excess emissions ^h	8	4
Report of area source becoming major ⁱ	6	1
Waiver application ^j	6	1
Compliance status information report ^c	4	1
Submit semiannual SSM reports ^q	2	2
Submit immediate reports of inconsistent procedures monitored at each affected source ^h	2	1
Submit a CMS summary report for HAP monitored at each affected source ^k	2	1
Subtotal for Reporting Requirements		
4. Recordkeeping requirements		
A. Familiarization with the regulatory requirements ^a	See 3A	
B. Plan activities	N/A	

C. Implement activities	See 4D, 4E	
D. Develop record system ^c	40	1
E. Time to enter information		
a. Records of control device monitoring parameters:		
- Continuously monitored parameters ^{k,1}	12	52
- LDAR program reporting and recordkeeping – BLR ^k	311	1
- LDAR program reporting and recordkeeping – WSR ^m	11	1
- Wastewater parameters ^{k, n}	2	12
F. Other recordkeeping activities		
a. Maintain records of occurrence and duration of each SSM of process and control equipment ^{b, o}	2	8
b. Maintain records of maintenance performed on air pollution control equipment ^b	2	4
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan ^{b, p}	2	1
d. Maintain records of each period during which a CMS is malfunctioning or inoperative ^k	2	1
e. Maintain records of result of all performance test and performance evaluations ^c	2	1
f. Maintain all initial notification and compliance status notifications ^c	1	1
G. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded)^f		
TOTAL CAPITAL AND O&M COST (rounded)^f		
GRAND TOTAL (rounded)^f		

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be seven, which consists of the additional new sources per year that will become subject to the rule over the three-year period of this ICR. We assume

^b This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$11.50 per hour for States Department of Labor, Bureau of Labor Statistics, September 2016, Table 2. Civilian Workers, by occupational category. We have assumed that 10 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that this is a one-time-only cost. Records for one-time reporting activities must only be retained for one year.

^d For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, storage tanks, and H₂S leak detection and repair program for equipment leaks. Because it is more cost effective, we have assumed that all facilities will have the continuous monitoring systems (CMS) installed.

^e We have assumed that one facility will have a physical or operational change.

^f We have assumed that it will require one test each for wastewater and process vents.

^g We have assumed that only one facility will have excess emissions.

^h We have assumed that there are seven sources that are subject to this regulation, so the number of sources without emissions is zero.

ⁱ We have assumed that no area sources are expected to become major sources.

- ^j We have assumed that one facility will require a waiver.
- ^k We have assumed that there are three basic liquid resins (BLR) manufacturing facilities.
- ^l We have assumed that these parameters will automatically be recorded with a data logger.
- ^m We have assumed that there are four WSR facilities subject to the rule.
- ⁿ We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.
- ^o We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility
- ^p We have assumed that it will take two hours once per year for each facility to maintain records for one deviation from
- ^q We have assumed that it will take each respondent two hours to submit semiannual (SSM) reports. Also quarterly r
- ^r Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Sep 2016 Labor Rates

108.28

144.33

53.34

(C) Person hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year ^b
1	7	7	0.4	0.7	\$846
1050	0	0	0	0	\$0
1050	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
2	0	0	0	0	\$0
2	1	2	0.1	0.2	\$241.66
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
6	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
64	1	64	3.2	6.4	\$7,733.15
32	6	192	9.6	19.2	\$23,199.46
6	0	0	0	0	\$0
6	1	6	0.3	0.6	\$724.98
4	0	0	0	0	\$0
4	7	28	1.4	2.8	\$3,383.25
2	7	14	0.7	1.4	\$1,691.63
2	3	6	0.3	0.6	\$724.98
			367		\$38,545

40	0	0	0	0	\$0
624	3	1872	93.6	187.2	\$226,194.70
311	3	933	46.65	93.3	\$112,734.86
11	4	44	2.2	4.4	\$5,316.54
24	3	72	3.6	7.2	\$8,699.80
16	7	112	5.6	11.2	\$13,533.02
8	7	56	2.8	5.6	\$6,766.51
2	7	14	0.7	1.4	\$1,691.63
2	3	6	0.3	0.6	\$724.98
2	0	0	0	0	\$0
1	0	0	0	0	\$0
		3,575			\$376,000
		3,940			\$415,000
					\$ 9,000
					\$ 424,000

72.96296296296

three basic liquid epoxy resins (BLR) plants and four wet strength resins (WSR) plants. There will be no fee that each respondent will have to familiarize with the regulatory requirements each year.

\$08.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. These rates are from the United States and industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110

percent for five years. The five year period after this initial activities precedes the period covered by this ICR renewal.

For air tanks, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart E. All WSR facilities will choose to comply with the alternative standard. These facilities are not required to have

The excess emissions report is six.

7.

on SSM plans.

Reporting may be reduced to semiannual reporting for sources that are in compliance for one year.

of Responses 54

1

4

24

1

14

7

3

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (Cx D)
Report review					
Notification of construction/reconstruction and startup ^c	2	1	2	0	0
Notification of physical and operational changes ^d	2	1	2	1	2
Notification of anticipated startup ^c	2	1	2	0	0
Notification of actual startup ^c	2	1	2	0	0
Notification of applicability of the standard new sources ^c	2	1	2	0	0
Notification of initial performance test ^c	2	1	2	0	0
Report of initial test ^c	8	1	8	0	0
Startup, shutdown, malfunction plan ^c	4	1	4	0	0
Quality control plan for CMS ^c	4	1	4	0	0
Semiannual SSM reports ^{e, f}	4	2	8	7	56
CMS summary report for HAP	4	1	4	3	12
Immediate reports of inconsistent procedures	4	1	4	7	28
Report of monitoring exceedances and periods of noncompliance ^g	8	4	32	1	32
Report of no excess emission	2	4	8	6	48
Waiver application ^h	8	1	8	1	8
TOTAL ANNUAL BURDEN AND COST (rounded)ⁱ					

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be seven, which consists of three liquid strength resins (WSR) plants. There will be no additional new sources per year that will become subject to the rule over the time period.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government Managerial rate (GS-13, Step 5, \$40.50 x 1.6), \$48.08 Technical rate (GS-12, Step 1, \$30.05 x 1.6), and \$26.02 Clerical rate (are from the Office of Personnel Management (OPM) 2017 General Schedule which excludes locality rates of pay.

^c We have assumed that this is a one-time-only cost.

^d We have assumed that only one facility will conduct some form of physical or operational change.

^e We have assumed that there are 7 sources that are subject to this regulation that report semiannually.

^f We have assumed that it will take four hour to review semiannual reports.

^g We have assumed that one facility will have excess emissions.

^h We have assumed that one facility will request a waiver.

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

dule

64.8 26.02

(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
0	0	\$0
0.1	0.2	\$107.84
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.8	5.6	\$3,019.63
0.6	1.2	\$647.06
1.4	2.8	\$1,509.82
1.6	3.2	\$1,725.50
2.4	4.8	\$2,588.26
0.4	0.8	\$431.38
214		\$10,000

id epoxy resins (BLR) plants and four wet
three-year period of this ICR.

ment overhead expenses: \$64.80
(GS-6, Step 3, \$16.26 x 1.6). These rates