

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	8	1	8
B. Required activities	N/A		
C. Create information	See 3E		
D. Gather existing information	See 3E		
E. Write Report			
Semiannual report on no deviations <sup>d</sup>	8	2	16
Semiannual report on deviations <sup>e</sup>	16	2	32
Semiannual report of startup, shutdown, malfunction (SSM) <sup>f</sup>	8	2	16
Semiannual report on equipment leaks <sup>g</sup>	303	2	606
Semiannual report on wastewater	See 4E		
Semiannual report on all other reports <sup>h</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities	N/A		
C. Implement Activities	N/A		
D. Develop record system	N/A		
E. Time to enter information			
Records of SSM <sup>i</sup>	1.5	52	78
Records of continuous parameters monitoring system (CPMS) data			
Record continuous monitor parameters <sup>j</sup>	1	365	365
Compile data <sup>k</sup>	24	2	48
Enter and verify information for semiannual report <sup>k</sup>	16	2	32
Records of closed-loop systems <sup>l</sup>	2	2	4
Records of nitrogen systems <sup>m</sup>	2	2	4
Records of material balances <sup>n</sup>	8	2	16
Records of supporting calculations <sup>o</sup>	8	2	16
Records for extended cookout <sup>p</sup>	8	2	16
Records for equipment leaks	See 3E		
All other records	See 3E		
F. Time for refresher training of personnel <sup>q</sup>	16	1	16
G. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>r</sup></b>			

<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>r</sup></b>			
<b>GRAND TOTAL (rounded) <sup>r</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 13 sources subject to the standard which includes the following facilities:
- <sup>b</sup> This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$108.26 per hour for other labor.
- <sup>c</sup> We have assumed all existing respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> We have assumed that 80 percent of respondents will report no deviation.
- <sup>e</sup> We have assumed that 20 percent of respondents will report a deviation.
- <sup>f</sup> We have assumed that all of the existing sources will be required to submit an SSM report.
- <sup>g</sup> We have assumed that it will take each respondent 303 hours on a semiannual basis to write reports for 4 cellulose ether facilities.
- <sup>h</sup> All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage tanks.
- <sup>i</sup> We have assumed that SSM records will be recorded on a weekly basis.
- <sup>j</sup> We have assumed that it will take each respondent one hour to record information on a daily basis on process vent, storage tanks, and other equipment.
- <sup>k</sup> We have assumed that each respondent will enter and verify information for the semiannual report twice per year.
- <sup>l</sup> We have assumed that it will take respondent two hours to enter information on 1 cellulose ether facility with a closed-loop system.
- <sup>m</sup> We have assumed that it will take each of the 9 respondents two hours to enter information on 9 viscose process facilities.
- <sup>n</sup> We have assumed that it will take each of the 9 respondents eight hours to enter information on 9 viscose process facilities.
- <sup>o</sup> We have assumed that it will take eight hours for each respondent to enter information on supporting calculations twice per year.
- <sup>p</sup> We have assumed that it will take respondents eight hours to enter information on 1 cellulose ether facility that uses external venting.
- <sup>q</sup> We have assumed that it will take each of the thirteen respondent two days (16 hours) to provide refresher training to personnel.
- <sup>r</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ing (40 CFR Part 63, Subpart UUUU) (Renewal)

108.28      144.33      53.34

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year <sup>b</sup>
13	104	5.2	10.4	\$12,566.37
10	160	8	16	\$19,332.88
3	96	4.8	9.6	\$11,599.73
13	208	10.4	20.8	\$25,132.74
4	2,424	121.2	242.4	\$292,893.13
13	208	10.4	20.8	\$25,132.74
		<b>3,680</b>		<b>\$386,658</b>
13	1,014	50.7	101.4	\$122,522.13
13	4,745	237.25	474.5	\$573,340.72
13	624	31.2	62.4	\$75,398.23
13	416	20.8	41.6	\$50,265.49
1	4	0.2	0.4	\$483.32
9	36	1.8	3.6	\$4,349.90
9	144	7.2	14.4	\$17,399.59
13	208	10.4	20.8	\$25,132.74
1	16	0.8	1.6	\$1,933.29
13	208	10.4	20.8	\$25,132.74
		<b>8,527</b>		<b>\$895,958</b>
		<b>12,200</b>		<b>\$1,280,000</b>

responses hr/response  
94 129.7872

				<b>\$1,010</b>
				<b>\$1,280,000</b>

4 cellulose ether; 4 cellulosic sponge; 3 cellulose food casing; 1 rayon; and 1 cellophane. There will be no additional \$ per hour for Technical labor, and \$53.34 per hour for Clerical labor. These rates are from the United States Department

facilities subject to leak detection and repair (LDAR) requirements. age vessel control device maintenance, will be reported twice per year.

ge tank and wastewater monitoring and inspections.

op system.

s with CS<sub>2</sub>, unloading and storage operations.

es using material balances.

per year.

nded cookout.

sonnel.

new sources per year that will become subject to the rule over the three-year period of this ICR.

Department of Labor, Bureau of Labor Statistics, September 2016, Table 2. Civilian Workers, by Occupational and Industry group

ps. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the t

benefit packages available to those employed by private industry.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing**

48.08

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)
Activity					
Initial performance test	N/A				
Repeat performance test	N/A				
Excess emissions enforcement activities	120	1	120	0	0
Review reports					
Review semiannual compliance report					
Report of no deviations <sup>c</sup>	2	2	4	10	40
Report of deviations <sup>d</sup>	8	2	16	3	48
Report of SSM <sup>e</sup>	2	2	4	13	52
Reports of equipment leaks <sup>f</sup>	8	2	16	4	64
Report on wastewater <sup>g</sup>	8	2	16	4	64
Report on all other reports <sup>h</sup>	2	2	4	13	52
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 13 sources that are subject to the standard which includes the following facilities
- <sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government employees
- <sup>c</sup> We have assumed that 80 percent of respondents will report no deviation.
- <sup>d</sup> We have assumed that 20 percent of respondents will report deviation.
- <sup>e</sup> We have assumed that all of the existing respondents will be required to submit an SSM report.
- <sup>f</sup> We have assumed that each of the 4 respondents for cellulose ether facilities will review their report on equipment leaks twice
- <sup>g</sup> We have assumed that it will take each respondent eight hours to review reports of 4 cellulose ether facilities subject to LTR
- <sup>h</sup> We have assumed that all other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger



**ig (40 CFR Part 63, Subpart UUUU) (Renewal)**

64.8 26.02

(F)	(G)	(H)
<b>Management person-hours per year (F=Ex0.05)</b>	<b>Clerical person-hours per year (G=Ex0.1)</b>	<b>Cost, \$<sup>b</sup></b>
0	0	\$0
2	4	\$2,156.88
2.4	4.8	\$2,588.26
2.6	5.2	\$2,803.94
3.2	6.4	\$3,451.01
3.2	6.4	\$3,451.01
2.6	5.2	\$2,803.94
<b>368</b>		<b>\$17,300</b>

ilities: 4 cellulose ether; 4 cellulosic sponge; 3 cellulose food casing; 1 rayon; and 1 cellophane.

overhead expenses: \$64.80 for Managerial (GS-13, Step 5, \$40.50 x 1.6), \$48.08 for Technical (GS-12, Step 1, \$30.05 x 1.6

o times per year.

AR and wastewater requirements.

er systems, and storage vessel control device maintenance, will be reported twice a year.

) and \$26.02 Clerical (GS-6, Step 3, \$16.26 x 1.6). These rates are from the Office of Personnel Management (OPM) 20

17 General Schedule which excludes locality rates of pay.