

Table 1: Annual Respondent Burden and Cost – NESHAP for Group I Polymers and Resins

Burden item	(A)
	Person- hours per occurrence
1. Applications	N/A
2. Survey and Studies	N/A
3. Acquisition, Installation, and Utilization of Tech. and Systems	See 5F
4. Reporting requirements	
A. Familiarize with regulatory requirements ^c	64
B. Required activities ^d	6.08
C. Create Information ^d	18.06
D. Gather existing information ^d	2.33
E. Write report	
Application of construction or reconstruction	2
Request for extension of compliance	2
Notification that source is subject to special compliance requirements	5
Notification of compliance status	20
Notification of storage vessel inspection ^e	5
Notification of front-end process vents limit ^f	4
Notification of back-end process vents limit ^f	4
Progress reports for source receiving extension of compliance ^g	4
Waiver of recordkeeping or reporting requirements	4
Supplemental report for failing to submit information required to be included in reports ^h	2
Operating permit application	40
Precompliance report ⁱ	40
Emissions averaging plan ^j	120
Updates to emissions averaging plan ^k	20
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging ^j	2
Semiannual periodic reports ^l	80
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting ^l	80
Compliance redetermination report for back-end process operations using a control or recovery device ^m	20
Report of changes to the primary product for an EPPU or process unit ⁿ	2
Report of changes or additions to plant sites ^o	2
Malfunction report ^p	8
Subtotal for Reporting Requirements	
5. Recordkeeping requirements	

A. Familiarize with regulatory requirements	See 4A
B. Plan activities	See 4B
C. Implement activities	See 4B
D. Develop record system	See 5E
E. Time to enter information	
Plan activities	See 4B
Create, test, research, develop	See 4C
Gather information, monitor, inspect	See 4D
Process, compile, review ^d	20
F. Train personnel ^d	2.1
G. Adjust existing ways to comply with prev. appl. reg.	N/A
H. Record and disclose information ^d	10.5
Store, file and maintain records	1
I. Audits	N/A
<i>Subtotal for Recordkeeping</i>	
TOTAL ANNUAL BURDEN AND COST (rounded) ^q	
CAPITAL AND O&M COST (rounded) ^q	
GRAND TOTAL (rounded) ^q	

Assumptions:

- a We assume there are 19 existing sources subject to the standard and no additional sources per year will be become
- b This ICR uses the following labor rates based on Department of Labor, Bureau of Labor Statistics (BLS) data “Tabl
- c This ICR assumes all existing sources will have to familiarize with the regulatory requirements each year.
- d The burden for these activities are based on similar requirements in the HON NESHP (Subparts F, G, H, and I). T
- e This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year
- f This ICR assumes that notifications for front- and back-end limits are submitted during the initial compl
- g This ICR assumes that all existing sources are already in compliance; new sources cannot receive compliance exter
- h This ICR assumes no respondents will be required to submit supplemental reports.
- i This ICR assumes that 10% of new sources will submit precompliance reports.
- j This ICR assume 10% of existing facilities will elect to use emission averaging and that all existing respondents are
- k This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to t
- l This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterl
- m This ICR assumes 10% of sources will make a process change that will require a redetermination of compliance re
- n This ICR assumes that 10% of sources will have changes to their primary product.
- o This ICR assumes that no respondents will make changes or additions to the plant sites.
- p This ICR assumes that 10% of sources will have to submit malfunction reports.
- q Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

3 (40 CFR Part 63, Subpart U) (Renewal)

108.28

144.33

53.34

(B)	(C)	(D)	(E)	(F)	(G)	(H)
No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year ^a	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 (\$) ^b
1	64	19	1,216	60.8	121.6	\$146,929.89
13	79	19	1,501	75.1	150.1	\$181,366.58
80	1,445	19	27,455	1,372.75	2,745.5	\$3,317,401.38
300	699	19	13,281	664.05	1,328.1	\$1,604,749.87
1	2	0	0	0	0	\$0
1	2	0	0	0	0	\$0
1	5	0	0	0	0	\$0
1	20	0	0	0	0	\$0
6	30	19	570	28.5	57	\$68,873.39
1	4	0	0	0	0	\$0
1	4	0	0	0	0	\$0
2	8	0	0	0	0	\$0
1	4	0	0	0	0	\$0
1	2	0	0	0	0	\$0
1	40	0	0	0	0	\$0
1	40	0	0	0	0	\$0
1	120	0	0	0	0	\$0
1	20	1	20	1	2	\$2,416.61
1	2	0	0	0	0	\$0
2	160	16	2,560	128	256	\$309,326.08
4	320	3	960	48	96	\$115,997.28
1	20	2	40	2	4	\$4,833.22
1	2	2	4	0.2	0.4	\$483.32
1	2	0	0	0	0	\$0
2	16	2	32	1.6	3.2	\$3,866.58
			54,748			\$5,752,378

Old ICR, which is based on a the HON but with slightly reduced values as there are fewer reqs for this Subpart than HON NESHAP - Old ICR said this Subpart has fewer reqs than the HON; however, the burden in the old ICR was higher than Old ICR, which is based on a the HON but with slightly reduced values as there are fewer reqs for this Subpart than Old ICR, which is based on a the HON but with slightly reduced values as there are fewer reqs for this Subpart than

2 hrs is common for this notification

assumed 2 hrs

hrs based on 7H "initial" notification, no new respondents

hrs based on 7H, no new respondents

hrs based on 7H, I assumed bimonthly storage vessel emptying and degassing

per 2011 amendment

per 2011 amendment

hrs based on III, I assumed all existing sources are in compliance, new sources cannot get extensions.

assumed 4 hrs

assumed 2 hrs

Operating permit has similar requirements to precompliance report so I assumed the hrs were the same.

hrs based on 7H, no new respondents

hrs based on 4D (note Subpart 4D is not necessarily related to this rule, but the other polymer rules did not include emissions as hrs assumed. I also assumed 1 facility per year will make a change necessitating an update to the EA plan.

hrs based on 4D (note Subpart 4D is not necessarily related to this rule, but the other polymer rules did not include emissions as

hrs from HON NESHAP

10% for EA + 5% of other sources (assumed) - hrs same as semiannual

I assumed 10% make changes require redetermination of compliance

hrs based on PPP "phys/operational change", I assumed 10% will make change

hrs based on PPP "phys/operational change", I assumed no respondents will make a change or addition

8 hrs and 10% of sources is common for malfunction reports

HON NESHAP - see footnote d (Old ICR said this Subpart has fewer reqs than the HON; however, the burden in the old ICR v
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Old ICR, which is based on a the HON but with reduced values as there are fewer reqs for this Subpart than the HC
From amendment, but assuming all facilities have this requirement

responses hr/response
167 337.72455

agerial labor; \$108.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. The rates have been increased by 11
water, heat exchangers, and equipment leaks) can vary significantly; therefore, it is too inaccurate to assume an average activity

elect to use nominal control after submitting the initial emissions averaging plan.

.9) + (5% x 19)= 2.85 sources, rounded to 3]. The remaining 16 sources will all submit semiannual reports.

n the HON

the estimate in the most recent HON ICR. Therefore, I used the HON estimate

n the HON

n the HON

eraging plans), I assumed 10% existing respondents use EA, new respondents not allowed to use EA

eraging plans), I assumed 10% existing respondents use EA and no sources using EA will request approval for nominal control

was higher than the estimate in the most recent HON ICR. Therefore, I used the HON estimate)
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DN

0 percent to account for the benefit packages available to those employed by private industry.

time (Column A) to calculate hours per facility (Column C). Rather, the HON NESHAP estimates the total hours per facility, €

l efficiency after submitting the initial plan, new respondents not allowed to use EA.

estimates the number activities per year (Column B) and uses the two numbers to back-calculate Column A. The HON NESHA

P also notes that the number of activities per year may vary from facility to facility, depending on consolidation of activities, cc

Allocated readings, etc. Since so much variability exists, it is important to note that this is an estimate and is only used to back-c

calculate Column A.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Group I Polymers and Resins

Burden Item	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
Activity			
1. Performance Tests: Initial	40	1	40
2. Performance Tests: Repeat ^c	40	1	40
Reports Review:			
1. Application of construction or reconstruction ^d	2	1	2
2. Notification that source is subject to special compliance requirements ^d	2	1	2
3. Notification of compliance status ^d	40	1	40
4. Notification of storage vessel inspection ^e	2	6	12
5. Notification of front-end process vents limit ^f	2	1	2
6. Notification of back-end process vents limit ^f	2	1	2
7. Waiver of recordkeeping or reporting requirements	10	1	10
8. Supplemental report for failing to submit information required to be included in reports ^g	2	1	2
9. Implementation plan, precompliance report or permit ^d	20	1	20
10. Updates to emissions averaging plan ^h	5	1	5
11. Semiannual Periodic Reports ^{d,i}	4	2	8
12. Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting ^{d,i}	4	4	16
13. Compliance redetermination report for back-end process operations using a control or recovery device ^j	10	1	10
14. Report of changes to the primary product for an EPPU or process unit ^k	2	1	2
15. Report of changes or additions to plant sites ^l	2	1	2
16. Malfunction report ^m	2	2	4
TOTAL ANNUAL BURDEN AND COST (rounded) ⁿ			

Assumptions:

- a We assume there are 19 existing sources subject to the standard and no additional sources per year will be become sul
- b This ICR uses the following labor rates: \$48.08 for technical, \$64.80 for managerial, and \$26.02 for clerical labor. Th
- c This ICR assumes 20% of sources will have to repeat performance tests.
- d The burden for these activities are based on similar requirements in the HON NESHAP (Subparts F, G, H, and I).
- e This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.
- f This ICR assumes that notifications for front- and back-end limits are submitted during the initial compliance period.
- g This ICR assumes no respondents will be required to submit supplemental reports.
- h This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the

- i This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterly reports.
- j This ICR assumes 10% of sources will make a process change that will require a redetermination of compliance reports.
- k This ICR assumes that 10% of sources will have changes to their primary product.
- l This ICR assumes that no respondents will make changes or additions to the plant sites.
- m This ICR assumes that 10% of sources will have to submit malfunction reports.
- n Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(40 CFR Part 63, Subpart U) (Renewal)

48.08 64.8 26.02

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	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, \$ ^b
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
19	228	11.4	22.8	\$12,294.22
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
1	5	0.25	0.5	\$269.61
16	128	6.4	12.8	\$6,902.02
3	48	2.4	4.8	\$2,588.26
2	20	1	2	\$1,078.44
2	4	0.2	0.4	\$215.69
0	0	0	0	\$0
2	8	0.4	0.8	\$431.38
		507		\$23,800

subject to the standard during the three-year period of this ICR

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay

emissions averaging plan. This activity may also include review of front-end or back-end operations limits.

reports. In addition, the 10% of facilities using emissions averaging are required to submit quarterly reports. The remaining
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ay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

sources will all submit semiannual reports.

