

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III)  
(Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal),  
EPA ICR Number 1783.09, OMB Control Number 2060-0357.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) were proposed on December 27, 1996, and promulgated on October 7, 1998. In 2014, the EPA evaluated the remaining risk and any updates to the technology and issued amendments to the rule that provide increased protection (79 FR 48073, August 15, 2014). These regulations apply to owners or operators of both new and existing facilities that engage in the manufacture of flexible polyurethane foam products which emit hazardous air pollutants (HAPs). This includes facilities making slabstock flexible polyurethane foam (slabstock foam), rebond flexible polyurethane foam (rebond foam), and/or molded flexible polyurethane foam (molded foam). This information is being collected to assure compliance with 40 CFR Part 63, Subpart III.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners or operators of flexible polyurethane foam production facilities to which this rule is applicable must choose one of the compliance options described in these standards or reduce HAP emissions to below the compliance level. Specifically, the rule requirements for slabstock foam producers include an initial notification, notification of compliance status, semiannual reports and annual compliance certifications. The rule requirements for molded and rebond foam producers include a notification of compliance status report and an annual compliance certification. 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. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners or operators of facilities that engage in the manufacture of flexible polyurethane foam products. The ‘burden’ to the Affected Public may be found below in Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (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 both Table 1b: Annual Respondent Burden and Cost for Federal Facilities– NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal), and Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal). A separate table breaks out the burden by affected sector and may be found below in Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal). Over the next three years, approximately 12 respondents per year will be subject to these standards, and it is estimated that no new respondents per year will become subject to the regulation in the next three years. Eleven of the 12 facilities in the United States, which are respondents to this ICR, are owned privately and operated by flexible polyurethane foam production facilities. One of these facilities is owned by the Federal government. None of the facilities are owned by either state, local or tribal agencies. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

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, hazardous air pollutants (HAP) emissions from flexible polyurethane foam 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 III.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times.

The notifications required in these standards are 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 and leaks are being detected and repaired and that these standards are being met. The performance test may also be observed.

The required annual and 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 III.

#### **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* (82 *FR* 29552) on June 29, 2017. 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 12 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 the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Polyurethane Foam Association, at (865) 657-9840, and the American Chemistry Council, at (202) 249-7000. A representative of the Polyurethane Foam Association agreed with the estimated burden as long as it accounted for increases due to inflation. We have updated the labor rates to reflect inflation since the previous renewal.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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 the 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 slabstock foam producers and molded and rebond foam producers. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 3086 which corresponds to the North American Industry Classification System (NAICS) 326150 for Urethane and Other Foam Product (except Polystyrene) 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 Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	§ 63.1306(a)
Application for approval of construction or reconstruction	§ 63.1306(b)
Notification of compliance status	§ 63.1306(c)
Request for extension of compliance, adjustments to time periods, and changes in information	§§ 63.9(c), 63.9(i), 63.9(j)
Notification that source is subject to special compliance requirements	§ 63.9(d)
Malfunction reports	§ 63.1306(f)
<b>Reports</b>	
Semiannual compliance reports	§ 63.1306(d)

<b>Reports</b>	
Annual compliance certification	§ 63.1306(e)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of malfunctions	§ 63.1307(h)
All reports and notifications	§ 63.10(b)(1)
Record of applicability	§ 63.10(a)
Slabstock sources shall maintain storage vessel records, equipment leak records, and product data sheets showing HAP content in ABA and equipment cleaners, and records of each use of a vapor return line	§§ 63.1307(a)-(e)
Molded/rebond foam sources shall maintain records of product data sheets for each compound other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, and the product data sheets showing HAP content in mold release agents	§§ 63.1307(f)-(g)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., flow rate monitoring and pump revolution per minute monitoring. 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Monitor the concentration level of the HAP or the organic compounds in the exhaust vent

<b>Respondent Activities</b>
stream, or the carbon replacement interval, for carbon adsorption systems.
Performance tests are not required by subpart III. However, sources are required to use Method 25A of part 60 for organic compounds measurements.
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:

<b>Agency Activities</b>
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. 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**

EPA assumes that approximately 25 percent of currently affected private sector facilities, or 3 facilities, may be small entities. 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 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Federal Facilities– NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a and 1b document 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 869 hours (Total Labor Hours from Tables 1a and 1b 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	\$149.35 (\$71.12 + 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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 standards are labor costs. There are no capital/startup or operation and maintenance costs. The capital/startup costs are one-time costs when a facility becomes subject to the regulation.

### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

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 since we have assumed that no new sources will become subject to these particular standards.

## **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 such activities 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

\$2,590.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (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 12 existing respondents will be subject to these standards. It is estimated that no additional respondents will become subject to these same standards over the next 3 years. The overall average number of respondents, as shown in the table below, is 12 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 <sup>1</sup>	(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	12	0	0	12
2	0	12	0	0	12
3	0	12	0	0	12
Average	0	12	0	0	12

<sup>1</sup> 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 12.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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
Initial Notification	0	0	0	0
Notification of Reconstruction/Modification	0	0	0	0
Pre-compliance Report	0	0	0	0
Notification of Special Compliance Requirements	0	0	0	0
Notification of Compliance Status	0	0	0	0
Semiannual Reports <sup>1</sup>	6	2	0	12
Annual Compliance Certifications <sup>2</sup>	12	1	0	12
			Total	24

<sup>1</sup> Only slabstock foam producers are required to submit semiannual reports.

<sup>2</sup> All respondents are required to submit annual compliance certifications.

The number of Total Annual Responses is 24.

The total annual labor costs are \$94,700. Details regarding these estimates may be found below in: 1) Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Federal Facilities– NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (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 1a-1c and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 869. Details regarding these estimates may be found in: 1) Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Federal Facilities– NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Flexible Polyurethane Foam Product

(40 CFR Part 63, Subpart III) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 36 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 55 labor hours at a cost of \$2,590; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The decrease is not due to any program changes. Instead, the change in burden hours and number of responses is a result of removing burden for reconstructed sources as no reconstructed sources are expected to occur during this ICR renewal period.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 36 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-2012-0668. 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-2012-0668 and OMB Control Number 2060-0357 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 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)**

Burden Items	A	B	C	D	E	F	G	H
	Person Hours per Occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C = A x B)	Respondents per year <sup>a</sup>	Technical person hours per year (E=CxD)	Managerial person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Costs per year (\$) <sup>b</sup>
1. Applications	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Survey and studies	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4. Reporting Requirements								
A. Familiarization with instructions	1	1	1	11	11	0.55	1.1	\$1,385.21
B. Required Activities								
i. Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements <sup>c</sup>	1	12	12	6	72	3.6	7.2	\$9,066.85
C. Create Information	Included in 4B and 5E							
D. Gather Existing Information	Included in 4B and 5E							
E. Write Report								
Initial notification <sup>d</sup>	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction <sup>d</sup>	2	1	2	0	0	0	0	\$0
Notification of Special Compliance Requirements <sup>e</sup>	2	1	2	0	0	0	0	\$0
Pre-compliance Report <sup>d</sup>	4	1	4	0	0	0	0	\$0
Notification of Compliance Status <sup>d</sup>	16	1	16	0	0	0	0	\$0
Semiannual Reports <sup>f</sup>	4	2	8	6	48	2.4	4.8	\$6,044.57

Annual Compliance Certifications <sup>g</sup>	2	1	2	11	22	1.1	2.2	\$2,770.43
<b>Subtotal for Reporting Requirements</b>	<b>34</b>	<b>21</b>	<b>49</b>			<b>176</b>		<b>\$19,267</b>
5. Recordkeeping Requirements								
A. Familiarization with instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	40	1	40	0	0	0	0	\$0
E. Time to enter information: records of monitoring and operations <sup>a</sup>								
Slabstock producers	8	12	96	6	576	28.8	57.6	\$72,534.82
Molded/rebond facilities	4	1	4	5	20	1	2	\$2,518.57
F. Train personnel	40	1	40	0	0	0	0	\$0
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Subtotal for Recordkeeping Requirements</b>	<b>92</b>	<b>15</b>	<b>180</b>			<b>685</b>		<b>\$75,053</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>h</sup></b>						<b>861</b>		<b>\$94,300</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>h</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>h</sup></b>								<b>\$94,300</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers for a total of 12 existing foam producers (i.e., respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations over the period of this ICR. Therefore, the average number of respondents per year for this ICR is estimated to be 12 and 11 of these facilities are private sector facilities.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$149.35 (\$71.12 + 110%); Technical \$112.98 (\$53.80 + 110%); and Clerical \$54.81 (\$26.10 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

<sup>c</sup> Molded/rebond foam producers only have recordkeeping and reporting requirements.

<sup>d</sup> We have assumed that all existing sources are in compliance with the initial rule requirements and no reconstructions will occur during this ICR renewal period.

<sup>e</sup> We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance date for this rule has passed.

<sup>f</sup> Only slabstock foam producers are required to submit semiannual reports.

<sup>g</sup> All respondents are required to submit annual compliance certifications.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)**

Burden Items	A	B	C	D	E	F	G	H
	Person Hours per Occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C = A x B)	Respondents per year <sup>a</sup>	Technical person hours per year (E=CxD)	Managerial person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Costs per year (\$) <sup>b</sup>
1. Applications	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Survey and studies	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4. Reporting Requirements								
A. Familiarization with instructions	1	1	1	1	1	0.05	0.1	\$53.92
B. Required Activities								
i. Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements <sup>c</sup>	1	12	12	0	0	0	0	\$0
C. Create Information	Included in 4B and 5E							
D. Gather Existing Information	Included in 4B and 5E							
E. Write Report								
Initial notification <sup>d</sup>	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction <sup>d</sup>	2	1	2	0	0	0	0	\$0
Notification of Special Compliance Requirements <sup>e</sup>	2	1	2	0	0	0	0	\$0
Pre-compliance Report <sup>d</sup>	4	1	4	0	0	0	0	\$0
Notification of Compliance Status <sup>d</sup>	16	1	16	0	0	0	0	\$0
Semiannual Reports <sup>f</sup>	4	2	8	0	0	0	0	\$0.00
Annual Compliance	2	1	2	1	2	0.1	0.2	\$107.84

Certifications <sup>g</sup>								
<b>Subtotal for Reporting Requirements</b>	<b>34</b>	<b>21</b>	<b>49</b>			<b>3</b>		<b>\$162</b>
5. Recordkeeping Requirements								
A. Familiarization with instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	40	1	40	0	0	0	0	\$0
E. Time to enter information: records of monitoring and operations <sup>a</sup>								
Slabstock producers	8	12	96	0	0	0	0	\$0.00
Molded/rebond facilities	4	1	4	1	4	0.2	0.4	\$215.69
F. Train personnel	40	1	40	0	0	0	0	\$0
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Subtotal for Recordkeeping Requirements</b>	<b>92</b>	<b>15</b>	<b>180</b>			<b>5</b>		<b>\$216</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>b</sup></b>						<b>8</b>		<b>\$400</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>b</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>h</sup></b>								<b>\$400</b>

Assumptions:

<sup>a</sup> We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers for a total of 12 existing foam producers (i.e., respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations over the period of this ICR. Therefore, the average number of respondents per year for this ICR is estimated to be 12 and 1 of these facilities is a federal government facility. This federal facility is assumed to be a molded/rebond source.

<sup>b</sup> This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: \$64.80 for Managerial (GS-13, Step 5, \$40.50+60%), \$48.08 for Technical (GS-12, Step 1, \$30.05 + 60%) and \$26.02 Clerical (GS-6, Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates of pay.

<sup>c</sup> Molded/rebond foam producers only have recordkeeping and reporting requirements.

<sup>d</sup> We have assumed that all existing sources are in compliance with the initial rule requirements.

<sup>e</sup> We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance date for this rule has passed.

<sup>f</sup> Only slabstock foam producers are required to submit semiannual reports.

<sup>g</sup> All respondents are required to submit annual compliance certifications.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)**

Affected Sector	Number of Responses	Labor Hours			Labor Cost	Capital and O&M Cost
		Reporting	Recordkeeping	Total		
Private	23	176	685	861	\$94,300	\$0
Public (Federal)	1	3	5	8	\$400	\$0
<b>Total</b>	<b>24</b>	<b>179</b>	<b>690</b>	<b>869</b>	<b>\$94,700</b>	<b>\$0</b>

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours/ Occurrence	Occurrences/ Plant/Year	EPA Hours/Year (C=A*B)	Plants/ Year <sup>a</sup>	Technical Hours/Year (C*D)	Managerial Hours/Year (E*0.05)	Clerical Hours/Year (E*0.10)	Total Costs/Year (\$) <sup>b</sup>
Initial Notification <sup>c</sup>	2	0	0	0	0	0	0	\$0
Notification of Reconstruction/Modification <sup>c</sup>	2	1	2	0	0	0	0	\$0
Pre-compliance Report <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of Special Compliance Requirements <sup>d</sup>	2	1	2	0	0	0	0	\$0
Notification of Compliance Status <sup>c</sup>	2	1	2	0	0	0	0	\$0
Semiannual Reports <sup>e</sup>	2	2	4	6	24	1.2	2.4	\$1,294.13
Annual Compliance Certifications <sup>f</sup>	2	1	2	12	24	1.2	2.4	\$1,294.13
<b>TOTAL (rounded)<sup>g</sup></b>						<b>55</b>		<b>\$2,590</b>

Assumptions:

<sup>a</sup> We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers for a total of 12 existing foam producers (i.e., respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations over the period of this ICR. Therefore, the average number of respondents per year for this ICR is estimated to be 12.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$64.80 (GS-13, Step 5, \$40.50 + 60%); Technical \$48.08 (GS-12, Step 1, \$30.05 + 60%); and Clerical \$26.02 (GS-6, Step 3, \$16.26 + 60%). These rates are from the OPM, 2017 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. This ICR assumes that Clerical hours are 10 percent of Technical hours and Managerial hours are 5 percent of Technical hours.

<sup>c</sup> We have assumed that all existing sources are in compliance with the initial rule requirements.

<sup>d</sup> We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance date for this rule has passed.

<sup>e</sup> Only slabstock foam producers are required to submit semiannual reports.

<sup>f</sup> All respondents are required to submit annual compliance certifications.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to

rounding.