

Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Fle

Burden Items	A	B
	Person Hours per Occurrence	No, of occurrences per respondent per year
1. Applications	N/A	N/A
2. Survey and studies	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A
4. Reporting Requirements		
A. Familiarization with instructions	1	1
B. Required Activities		
i. Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12
C. Create Information	Included in 4B and 5E	
D. Gather Existing Information	Included in 4B and 5E	
E. Write Report		
Initial notification ^d	2	1
Notification of modification/reconstruction ^d	2	1
Notification of Special Compliance Requirements ^e	2	1
Pre-compliance Report ^d	4	1
Notification of Compliance Status ^d	16	1
Semiannual Reports ^f	4	2
Annual Compliance Certifications ^g	2	1
Subtotal for Reporting Requirements	34	21
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
E. Time to enter information: records of monitoring and operations ^a		
Slabstock producers	8	12
Molded/rebond facilities	4	1
F. Train personnel	40	1
G. Audits	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15
TOTAL LABOR BURDEN AND COST (rounded)^h		
TOTAL CAPITAL AND O&M COSTS (rounded)^h		

GRAND TOTAL (rounded)^h

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Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations for this ICR is estimated to be 12 and 11 of these facilities are private sector facilities.

^b This ICR uses the following labor rates: Managerial \$149.35 (\$71.12 + 110%); Technical \$112.98 (\$53.80 + 110%); and Civilian Labor, Bureau of Labor Statistics, June 2017, Table 2. Civilian workers, by occupational and industry group. The rates are for account for the benefit packages available to those employed by private industry. This ICR assumes that Managerial hours are

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements and no reconstructions will occur.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

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

Labor Rates: 112.98 149.35 54.81

C	D	E	F	G	H
Person hours per respondent per year (C = A x B)	Respondents per year ^a	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 (\$) ^b
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
1	11	11	0.55	1.1	\$1,385.21
12	6	72	3.6	7.2	\$9,066.85
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
16	0	0	0	0	\$0
8	6	48	2.4	4.8	\$6,044.57
2	11	22	1.1	2.2	\$2,770.43
49			176		\$19,267
40	0	0	0	0	\$0
96	6	576	28.8	57.6	\$72,534.82
4	5	20	1	2	\$2,518.57
40	0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A	N/A
180			685		\$75,053
			861		\$94,300
					\$0

Note to OC: The previous was confirmed by review to account for private federal labor rates for

No of RespHrs/Respon
23 37

			\$94,300
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ducers for a total of 12 existing foam producers (i.e., respondents) that are major sources
erations over the period of this ICR. Therefore, the average number of respondents per year

lerical \$54.81 (\$26.10 + 110%). These rates are from the United States Department of
rom column 1, "Total compensation". The rates have been increased by 110 percent to
re 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

ccur during this ICR renewal period.

date for this rule has passed.

ious ICR indicated that at least one facility is owned by the federal government. This
iewing the 2014 RTR facility list. The burden has been separated into into two tables
e labor rates for 11 facilities (mix of slabstock and molded/rebond sources), and
r the 1 facility, which appears to be a molded/rebond source.

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Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Fle (Renewal)

Burden Items	A	B
	Person Hours per Occurrence	No, of occurrences per respondent per year
1. Applications	N/A	N/A
2. Survey and studies	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A
4. Reporting Requirements		
A. Familiarization with instructions	1	1
B. Required Activities		
i. Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12
C. Create Information	Included in 4B and 5E	
D. Gather Existing Information	Included in 4B and 5E	
E. Write Report		
Initial notification ^d	2	1
Notification of modification/reconstruction ^d	2	1
Notification of Special Compliance Requirements ^e	2	1
Pre-compliance Report ^d	4	1
Notification of Compliance Status ^d	16	1
Semiannual Reports ^f	4	2
Annual Compliance Certifications ^g	2	1
Subtotal for Reporting Requirements	34	21
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
E. Time to enter information: records of monitoring and operations ^a		
Slabstock producers	8	12
Molded/rebond facilities	4	1
F. Train personnel	40	1
G. Audits	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15
TOTAL LABOR BURDEN and COST (rounded)^h		
TOTAL CAPITAL AND O&M COST (rounded)^h		
GRAND TOTAL (rounded)^h		

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations. 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

^b This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: 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 Management and Enterprise Services.

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III)

Labor Rates: 48.08 64.8 26.02

C	D	E	F	G	H
Person hours per respondent per year (C = A x B)	Respondents per year ^a	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 (\$) ^b
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
1	1	1	0.05	0.1	\$53.92
12	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
16	0	0	0	0	\$0
8	0	0	0	0	\$0
2	1	2	0.1	0.2	\$107.84
49			3		\$162
40	0	0	0	0	\$0
96	0	0	0	0	\$0
4	1	4	0.2	0.4	\$215.69
40	0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A	N/A
180			5		\$216
			8		\$400
					\$0
					\$400

Note to OC: The previous data was confirmed by reviewing the private labor rates at the 1 facility, which are as follows:

No of Resp Hrs/Respor
1 8

ducers for a total of 12 existing foam producers (i.e., respondents) that are major sources and
ons over the period of this ICR. Therefore, the average number of respondents per year for
i molded/rebond source.

vernment employees: \$64.80 for Managerial (GS-13, Step 5, \$40.50+60%), \$48.08 for
e of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates

date for this rule has passed.

us ICR indicated that at least one facility is owned by the federal government. This was g the 2014 RTR facility list. The burden has been separated into into two tables to account for 11 facilities (mix of slabstock and molded/rebond sources), and federal labor rates for pears to be a molded/rebond source.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector –

Affected Sector	Number of Responses	Labor Hours	
		Reporting	Recordkeeping
Private	23	176	685
Public (Federal)	1	3	5
<i>Total</i>	<i>24</i>	<i>179</i>	<i>690</i>

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

	Labor Cost	Capital and O&M Cost
Total		
861	\$94,300	\$0
8	\$400	\$0
869	\$94,700	\$0

36.21 hrs/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foams (Subpart III) (Renewal)

Activity	(A)	(B)	(C)	(D)
	EPA Hours/ Occurrence	Occurrences/ Plant/Year	EPA Hours/Year (C=A*B)	Plants/ Year ^a
Initial Notification ^c	2	0	0	0
Notification of Reconstruction/Modification ^c	2	1	2	0
Pre-compliance Report ^c	2	1	2	0
Notification of Special Compliance Requirements ^d	2	1	2	0
Notification of Compliance Status ^c	2	1	2	0
Semiannual Reports ^e	2	2	4	6
Annual Compliance Certifications ^f	2	1	2	12
TOTAL (rounded)^g				

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers and the average number of respondents per year for this ICR is estimated to be 12.

^b This ICR uses the following labor rates: Managerial \$64.80 (GS-13, Step 5, \$40.50 + 60%); Technical \$48.08 (GS-12, Step 1). These rates are from the OPM, 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 5 percent for employees. This ICR assumes that Clerical hours are 10 percent of Technical hours and Managerial hours are 5 percent of Technical hours.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance data is not available.

^e Only slabstock foam producers are required to submit semiannual reports.

^f All respondents are required to submit annual compliance certifications.

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

am Product (40 CFR Part 63,

(E)	(F)	(G)	(H)
Technical	Managerial	Clerical	Total
Hours/Year	Hours/Year	Hours/Year	Costs/Year (\$) ^b
(C*D)	(E*0.05)	(E*0.10)	
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
24	1.2	2.4	\$1,294.13
24	1.2	2.4	\$1,294.13
55			\$2,590

icers for a total of 12 existing foam producers (i.e., respondents) that commencing operations over the period of this ICR. Therefore, the

, \$30.05 + 60%); and Clerical \$26.02 (GS-6, Step 3, \$16.26 + 60%).
60 percent to account for the benefit packages available to government
hnical hours.

ite for this rule has passed.