

Table 1: Annual Respondent Burden and Cost – NESHAP for Benzene Waste Operation

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements	1	1	1	270
B. Required activities	See 3C			
C. Create information				
i. Determine quantity of benzene in waste ^l	2	1	2	0
ii. Initial waste determination ^l	2	1	2	0
iii. Treatment performance evaluation ^l	2	1	2	0
iv. Annual waste determination ^{c, d}	2	1	2	270
v. Monthly treated waste analysis ^{e, f}	1	12	12	14
vi. Treatment/control device monitoring	See 4C			
vii. Initial visual inspection ^l	2	1	2	0
viii. Quarterly visual inspection ^g	2	4	8	135
ix. Annual method 21 monitoring ^h	6	1	6	135
D. Gather existing information	See 3E			
E. Write report				
New source				
Notification of const/reconstruction	N/A			
Notification of anticipated/actual startup	N/A			
Notification/report of performance test	N/A			
Existing sources				
Initial report	N/A			
Quarterly emission report	4	4	16	135
Annual report	1	1	1	270
Notification of offsite facility ⁱ	2	12	24	14
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarization with regulatory requirements	See 3A			
B. Plan activities	See 4C			
C. Implement activities				
i. Filing and maintain records ^j	78	1	78	135
ii. Concentration data (annual benzene quantity determination) ^k	0.5	12	6	121
iii. Concentration data	0.5	12	6	14
iv. Waste quantity data ^l	1	1	1	0
D. Develop record system	See 4C			

E. Time to enter information	See 4C			
F. Train Personnel	N/A			
G. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COSTS (rounded):^m				
TOTAL CAPITAL and O&M COST:^m				
GRAND TOTAL (rounded):^m				

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 270. There will be 270 respondents over the three-year period of the ICR. It is estimated that 135 sources that have a total annual benzene (TAB) quantity greater than 10 Mg/yr. It is also estimated that 135 sources that have a TAB greater than 10 Mg/yr required to comply with the control.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$74.68 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2011. The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for inflation.

^c We have assumed that it will take each respondent two hours once per year to create the annual waste determination.

^d We have assumed that all facilities above 1 Mg/yr must evaluate waste streams annually for TAB.

^e We have assumed that it will take one hour each month for each respondents to create the monthly treated waste samples and 0.5 hours per sample for analysis for a total of 1 hour per sample).

^f We have assumed that 90 percent of 135 sources (121) will monitor process parameters, and the remaining 10 percent (14) will not.

^g We have assumed that 135 facilities that are expected to be greater than 10 Mg per year must comply with the control.

^h We have assumed that 135 respondents will each take six hours once per year to comply with the annual method.

ⁱ We have assumed that 10 percent of facilities (14) will choose to ship their waste offsite once a month for treatment.

^j We have assumed that 135 respondents will take 78 hours once per year to comply with the record requirement.

^k We have assumed that 121 respondents will take 30 minutes twelve times per year to repeat the benzene quantity.

^l We have assumed that this is a one-time only activity.

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

is (40 CFR Part 61, Subpart FF) (Renewal)

(E) Technical person- hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
270	14	1	\$32,387.72
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
540	27	54	\$67,661.19
168	8.4	17	\$21,050.15
0	0	0	\$0
1,080	54	108	\$135,322.38
810	40.5	81	\$101,491.79
2,160	108	216	\$270,644.76
270	13.5	27	\$33,830.60
336	16.8	33.6	\$42,100.30
6,453			\$704,489
10,530	526.5	1,053	\$1,319,393.21
726	36.3	72.6	\$90,966.71
84	4.2	8.4	\$10,525.07
0	0	0	\$0

Labor Rates

Tech	112.35
Mngmt	149.35
Cler	54.81

		13,041	\$1,420,885
		19,500	\$2,130,000
			\$0
			\$2,130,000

20 hr/resp

will be no additional new sources that will become subject to the rule quantity waste between 1 Mg/yr and 10 Mg/yr must file an annual report. requirements must file quarterly reports.

or; \$112.98 per hour for Technical labor, and \$54.81 per hour for l4, "Table 2. Civilian Workers, by Occupational and Industry group." or the benefit packages available to those employed by private industry.

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percent (14) must conduct monthly sampling.

quarterly visual inspection requirements.

od 21 monitoring requirements.

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Table 2: Average Annual EPA Burden and Cost – NESHAP for Benzene Waste Operations (4

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (CxD)	(F) Management person hours per year (Ex0.05)
Initial performance tests	N/A					
Report Review	N/A					
New Plant						
Notification of construction ^c	2	1	2	0	0	0
Notification of anticipated startup	N/A					
Notification of actual startup	N/A					
Initial report	N/A					
Notification of performance test	N/A					
Existing Plants						
Quarterly reports ^d	2	4	8	135	1,080	54
Annual recertification ^e	1	1	1	270	270	13.5
TOTAL (rounded) ^f						1,550

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 270 and there will become subject to the rule over the three-year period of the ICR. It is estimated that 135 sources that have a total annual benzene emissions between 1 Mg/yr and 10 Mg/yr must file an annual report. It is also estimated that 135 sources that have a TAB greater than 10 Mg/yr with the control requirements must file quarterly reports.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gross pay for Managerial (GS-13, Step 5, \$40.50 x 1.6), \$48.08 for Technical (GS-12, Step 1, \$30.05 x 1.6), and \$26.02 Clerical rates are from the Office of Personnel Management (OPM) “2015 General Schedule” which excludes locality rates of pay.

^c We have assumed that this is a one-time activity for each new facility.

^d We have assumed that the Agency will review quarterly reports for 135 respondents.

^e It is assumed that it will take one hour per year to review the annual recertification from each respondent.

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

40 CFR Part 61, Subpart FF) (Renewal)

(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year^b
0	\$0
108	\$58,235.76
27	\$14,558.94
	\$72,800

Labor Rates	
Tech	\$48.08
Mngmt	\$64.80
Cler	\$26.02

There are no additional new sources that will
 exceed the annual benzene (TAB) quantity waste
 limit of more than 10 Mg/yr and have complied

Government overhead expenses: \$62.80
 (GS-6, Step 3, \$16.26 x 1.6). These
 are payable.