

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63,
Subpart M) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Renewal), EPA ICR Number 2027.07, OMB Control Number 2060-0516.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) were proposed on August 8, 2001 (66 FR 41729), promulgated on April 14, 2003 (68 FR 18062), and most-recently amended on April 20, 2006. These regulations apply to existing facilities, new, or reconstructed sources at facilities engaged in flexible polyurethane foam fabrication. For rule purposes, flexible polyurethane foam fabrication is further divided into the following two subcategories: 1) loop slitter adhesive use; and 2) flame lamination. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart M.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. 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 and operators of existing flexible polyurethane foam fabrication industry. The ‘burden’ to the Affected Public may be found below in Table 1 Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (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 Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Renewal).

There are currently approximately 18 flexible polyurethane foam fabrication facilities,

which are all owned and operated by the flexible polyurethane foam fabrication industry. None of the 18 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. 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).

Over the next three years, an average of 19 respondents per year will be subject to these standards, and one additional respondent per year will become subject to these same standards (for an average of 20 total respondents per year). All existing respondents are flame lamination sources. EPA anticipates that all new respondents will also be flame lamination sources. No loop slitter facilities are currently subject. EPA does not expect any loop slitter facilities to become subject to the regulation over the three-year ICR period. These estimates are based on the assumption that the growth rate of the industry has remained consistent since the most-recently approved ICR.

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 pollutant (HAP) emissions from flexible

polyurethane foam fabrication 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 MMMMM.

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 standard. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

The required 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 MMMMM.

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* (83 FR 24785) on May 30, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

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 these standards, 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 20 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as it was being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the Polyurethane Foam Association, at (865) 657-9840, and the American Chemistry Council Center for the Polyurethanes Industry, at (202) 249-7000.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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 these 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 either 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 flexible polyurethane foam fabrication facilities. 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 Products (except Polystyrene) Manufacturing.”

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M).

A source must make the following reports:

Notifications	
Initial notifications	§§63.8816(a), 63.9(b)
Application for construction/reconstruction (note: new or reconstructed sources must instead submit this application in lieu of initial notifications)	§63.8816(c), §63.9(b)(1)(iii)
Notification of performance test	§63.8816(d), §63.7(b), §63.9(e)
Notification of compliance status	§§63.8816(e)-(h),

Notifications	
	§63.9(h)(2)(ii)

Reports	
Initial and subsequent semiannual compliance reports (flame lamination sources only)	§63.8818(b)
Initial and subsequent annual compliance reports (loop slitter sources only)	§63.8818(c)
Startup, shutdown, and malfunction (SSM) report (flame lamination sources only)	§63.8818(i), §63.6(e)(3), §63.10(d)(5)

A source must keep the following records:

Recordkeeping	
Record of all notifications and reports	§63.8820(a)
Record of SSM, performance tests, operating parameters, and emissions deviations (flame lamination sources only)	§63.8820(b)
Record of adhesives used, adhesives suppliers, and Method 311 tests (loop slitter sources only)	§63.8820(c)
Five-year records retention	§63.8822(b), §63.10(b)(1)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.

Respondent Activities
Install, calibrate, maintain, and operate CMS for pressure drop, pH, and liquid flow rate for each scrubber.
Perform initial performance test, Reference Method 311 test, and repeat performance tests if necessary.
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:

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
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. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance was achieved. 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

The majority of the respondents are large entities (i.e., large businesses). 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 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents 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 22,200 hours (Total Labor Hours from Table 1 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	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "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 type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One	Number of Respondents with O&M	Total O&M, (E X F)

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
				Respondent		
Differential pressure, pH, liquid flow rate, data recorder	\$997	1	\$997	\$1,674	20	\$33,480
Total (rounded)			\$997			\$33,500

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

The total capital/startup costs for this ICR are \$997. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$33,500. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$34,500. These are recordkeeping costs.

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 \$123,000.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 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 Fabrication (40 CFR Part 63, Subpart M) (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 19 existing respondents will be subject to these standards. It is estimated that an additional one respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 20 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 ¹	(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	1	18	0	0	19
2	1	19	0	0	20
3	1	20	0	0	21
Average	1	19	0	0	20

¹ 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 20.

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

Total Annual Responses				
(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	1	1	0	1
Application for construction/reconstruction	1	1	0	1

Total Annual Responses				
Notification of performance test	1	1	0	1
Notification of compliance status	1	1	0	1
Initial compliance report:				
Loop slitter sources	0	1	0	0
Flame lamination sources	1	1	0	1
Subsequent compliance reports:				
Loop slitter sources	0	1	0	0
Flame lamination sources	20	2	0	40
SSM report	20	10	0	200
			Total	245

The number of Total Annual Responses is 245.

The total annual labor costs are \$2,530,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (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 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 22,200. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (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 91 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$34,500. 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 2,590 labor hours at a cost of \$123,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (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 increase in the total estimated respondent burden compared with the ICR currently approved by OMB. The increase in burden is not due to any program changes, but is due to an adjustment. The adjustment increase in burden from the most-recently approved ICR is due to an increase in the number of new or modified sources due to continued industry growth. In addition, the burden estimate for reading and understanding the rule requirements was adjusted to reflect the time it would take existing respondents to review the rule each year. The overall result is an increase in burden and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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-2014-0086. 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-2014-0086 and OMB Control Number 2060-0516 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 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Renewal)

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
1. Familiarization with rule requirements								
New Sources	4	1	4	1	4	0.2	0.4	\$523.97
Existing Sources	1	1	1	19	19	1.0	1.9	\$2,488.85
2. Gather information	4	1	4	20	80	4.0	8.0	\$10,479.36
3. Reports								
a. Initial notification	2	1	2	1	2	0.1	0.2	\$261.98
b. Application for construction/reconstruction	2	1	2	1	2	0.1	0.2	\$261.98
c. Notification of performance test	2	1	2	1	2	0.1	0.2	\$261.98
d. Notification of compliance status	20	1	20	1	20	1	2	\$2,619.84
e. Initial compliance report								
i. Flame lamination facilities	8	1	8	1	8	0.4	0.8	\$1,047.94
ii. Loop slitter facilities	8	1	8	0	0	0	0	\$0
f. Annual compliance report ^c	2	1	2	0	0	0	0	\$0
g. Semiannual compliance report	4	2	8	20	160	8.0	16.0	\$20,958.72
h. SSM report ^d	2	10	20	20	400	20	40	\$52,396.80
Reporting Subtotal						801		\$91,301
3. Recordkeeping requirements								
a. Plan activities	10	1	10	1	10	0.5	1	\$1,309.92
b. Implement activities for flame lamination								
i. Record SSM	1	100	100	20	2,000	100	200	\$261,984.00
ii. Conduct performance test ^e	50	1	50	1	50	2.5	5	\$6,549.60
iii. Record CPMS measurements	2	300	600	20	12,000	600	1,200	\$1,571,904.00

iv. CPMS calibration and maintenance ^f	4	50	200	20	4,000	200	400	\$523,968.00
c. Implement activities for loop slitters								
i. Record adhesives used and suppliers	1	1	1	0	0	0	0	\$0
ii. Conduct Method 311 test	4	1	4	0	0	0	0	\$0
d. Develop record system								
i. SSM plan	40	1	40	1	40	2	4	\$5,239.68
ii. CPMS maintenance plan	20	1	20	1	20	1	2	\$2,619.84
e. Time to train personnel								
i. CPMS acquisition and installation	20	1	20	1	20	1	2	\$2,619.84
ii. CPMS inspection and monitoring	4	1	4	1	4	0.2	0.4	\$523.97
f. Store, file, and maintain all records ^g	1	12	12	20	240	12.0	24.0	\$31,438.08
g. Retrieve records/reports ^h	1	12	12	20	240	12.0	24.0	\$31,438.08
Recordkeeping Subtotal						21,417		\$2,439,595
TOTAL LABOR BURDEN AND COST (rounded) ⁱ						22,200		\$2,530,000
TOTAL ANNUAL CAPITAL AND O&M COST (rounded) ⁱ								\$34,500
GRAND TOTAL (rounded) ⁱ								\$2,560,000

CPMS - Continuous Parameter Monitoring System

SSM - Startup, Malfunction, or Startup

Assumptions:

^a EPA estimates an average of 19 existing sources will be subject to the standard. One additional new source (flame lamination) will become subject to the rule over the three-year period of this ICR, for a total of 20 respondents per year.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Applies to loop splitter adhesive facilities only.

^d EPA assumes each respondent will submit SSM reports ten times per year.

^e EPA assumes this activity also includes writing the site-specific test plan.

^f EPA assumes each respondent will implement CPMS calibration and maintenance activities 50 times per year.

^g EPA assumes each respondent will file and maintain records on a monthly basis.

^h EPA assumes each respondent will retrieve records/reports 12 times per year.

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

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

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
Review initial notification	4	1	4	1	4	0.2	0.4	\$218.69
Review application for construction/reconstruction	4	1	4	1	4	0.2	0.4	\$218.69
Review notification of performance test	4	1	4	1	4	0.2	0.4	\$218.69
Review notification of compliance status	20	1	20	1	20	1	2	\$1,093.47
Review initial compliance report								
Flame lamination facilities	20	1	20	1	20	1	2	\$1,093.47
Loop slitter facilities	2	1	2	0	0	0	0	\$0
Review annual compliance report ^c	1	1	1	0	0	0	0	\$0
Review semiannual compliance report	15	2	30	20	600	30.0	60	\$32,804.10
Review SSM report	8	10	80	20	1,600	80	160	\$87,477.60
TOTAL ANNUAL BURDEN AND COST (rounded) ^d					2,590			\$123,000

Assumptions:

^a EPA estimates an average of 19 existing sources will be subject to the standard. One additional new source (flame lamination) will become subject to the rule over the three-year period of this ICR, for a total of 20 respondents per year.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

^c Applies to loop slitter adhesive facilities only.

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