

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

<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	1	1	0	1
Application for construction/reconstruction	1	1	0	1
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 (semiannual reports)	20	2	0	40
SSM report	20	10	0	200
			Total	245

**ERG Notes:**

*hrs/response:* 90.6



**Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam**

Burden item	A	B	C
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)
1. Familiarization with rule requirements			
New Sources	4	1	4
Existing Sources	1	1	1
2. Gather information	4	1	4
3. Reports			
a. Initial notification	2	1	2
b. Application for construction/reconstruction	2	1	2
c. Notification of performance test	2	1	2
d. Notification of compliance status	20	1	20
e. Initial compliance report			
i. Flame lamination facilities	8	1	8
ii. Loop slitter facilities	8	1	8
f. Annual compliance report <sup>c</sup>	2	1	2
g. Semiannual compliance report	4	2	8
h. SSM report <sup>d</sup>	2	10	20
<b>Reporting Subtotal</b>			
3. Recordkeeping requirements			
a. Plan activities	10	1	10
b. Implement activities for flame lamination			
i. Record SSM	1	100	100
ii. Conduct performance test <sup>e</sup>	50	1	50
iii. Record CPMS measurements	2	300	600
iv. CPMS calibration and maintenance <sup>f</sup>	4	50	200
c. Implement activities for loop slitters			
i. Record adhesives used and suppliers	1	1	1
ii. Conduct Method 311 test	4	1	4
d. Develop record system			
i. SSM plan	40	1	40
ii. CPMS maintenance plan	20	1	20
e. Time to train personnel			
i. CPMS acquisition and installation	20	1	20
ii. CPMS inspection and monitoring	4	1	4
f. Store, file, and maintain all records <sup>g</sup>	1	12	12
g. Retrieve records/reports <sup>h</sup>	1	12	12
<b>Recordkeeping Subtotal</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>i</sup></b>			
<b>TOTAL ANNUAL CAPITAL AND O&amp;M COST (rounded) <sup>i</sup></b>			
<b>GRAND TOTAL (rounded) <sup>i</sup></b>			

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 (flam 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; \$ These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to the
- c Applies to loop slitter 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.

**1 Fabrication (40 CFR Part 63, Subpart M) (Renewal)**

Labor Rates: \$ 117.92 \$ 147.40 \$ 57.02

These rates were updated 11/15/18

D	E	F	G	H
Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1	4	0.2	0.4	\$523.97
19	19	1.0	1.9	\$2,488.85
20	80	4.0	8.0	\$10,479.36
1	2	0.1	0.2	\$261.98
1	2	0.1	0.2	\$261.98
1	2	0.1	0.2	\$261.98
1	20	1	2	\$2,619.84
1	8	0.4	0.8	\$1,047.94
0	0	0	0	\$0
0	0	0	0	\$0
20	160	8.0	16.0	\$20,958.72
20	400	20	40	\$52,396.80
<b>801</b>				<b>\$91,301</b>
1	10	0.5	1	\$1,309.92
20	2,000	100	200	\$261,984.00
1	50	2.5	5	\$6,549.60
20	12,000	600	1,200	\$1,571,904.00
20	4,000	200	400	\$523,968.00
0	0	0	0	\$0
0	0	0	0	\$0
1	40	2	4	\$5,239.68
1	20	1	2	\$2,619.84
1	20	1	2	\$2,619.84
1	4	0.2	0.4	\$523.97
20	240	12.0	24.0	\$31,438.08
20	240	12.0	24.0	\$31,438.08
<b>21,417</b>				<b>\$2,439,595</b>
<b>22,200</b>				<b>\$2,530,000</b>
				<b>\$34,500</b>
				<b>\$2,560,000</b>

<--Split this out into two rows for r existing sources to do this, but it sh familiar with rule.

Source Type	No.
Existing (average)	19
New	1

ERG Notes: 20

Prev. renewal 18,900 hrs and \$1,933,300

ne lamination) will become subject to the rule over the three-year period of this

\$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor.  
ian Workers, by Occupational and Industry group.” The rates are from column 1,  
se employed by private industry.

to match the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupa

new and existing, as we are now accounting for  
could take less time as they should be somewhat

10,000. Net increase due to industry growth.



tional and industry group

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Fo**

Labor Rates:

	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>Burden item</b>	<b>EPA person-hours per occurrence</b>	<b>Annual occurrences per respondent</b>	<b>EPA person-hours per respondent per year (AxB)</b>	<b>Respondents per year <sup>a</sup></b>
Review initial notification	4	1	4	1
Review application for construction/reconstruction	4	1	4	1
Review notification of performance test	4	1	4	1
Review notification of compliance status	20	1	20	1
Review initial compliance report				
Flame lamination facilities	20	1	20	1
Loop slitter facilities	2	1	2	0
Review annual compliance report <sup>c</sup>	1	1	1	0
Review semiannual compliance report	15	2	30	20
Review SSM report	8	10	80	20
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>				

**Assumptions:**

a EPA estimates an average of 19 existing sources will be subject to the standard. One additional new source (flam 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 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 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.

**m Fabrication (40 CFR Part 63, Subpart M) (Renewal)**

\$ 48.75	\$ 65.71	\$ 26.38	
E	F	G	H
Technical hours per year (Cx $\times$ D)	Management hours per year (Ex $\times$ 0.05)	Clerical hours per year (Ex $\times$ 0.10)	Annual cost (\$) <sup>b</sup>
4	0.2	0.4	\$218.69
4	0.2	0.4	\$218.69
4	0.2	0.4	\$218.69
20	1	2	\$1,093.47
20	1	2	\$1,093.47
0	0	0	\$0
0	0	0	\$0
600	30.0	60	\$32,804.10
1,600	80	160	\$87,477.60
<b>2,590</b>			<b>\$123,000</b>

These rates were updated 11/15/18 to ma

ERG Notes:

Prev renewal: 2,210 hrs and \$101,000. Net incr

ie lamination) will become subject to the rule over the three-year

for government overhead expenses: Managerial rate of \$65.71 (GS-5-6, Step 3, \$16.49 + 60%). These rates are from the Office of

Match the rates from the Office of Personnel Management (OPM), 2018 General Schedule.

Increase due to industry growth.

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

(A)	(B)	(C)	(D)	(E)
Requirement	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C) <sup>b</sup>	Annual O&M Costs for One Respondent
Differential pressure, pH, liquid flow rate, data recorder	\$997	1	\$997	\$1,674
Total			\$997	

N/A - Not Applicable

(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
20	\$33,480
	\$33,500