

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal), EPA ICR Number 2432.04, OMB Control Number 2060-0666.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) were proposed on May 20, 2011, and promulgated on April 17, 2012. These regulations apply to both existing and new PVC production facilities. Area source PVC facilities are subject to 40 CFR Part 63, Subpart DDDDDD and not covered in this ICR. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHHHHH.

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” includes existing and new PVC and copolymer production major facilities. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal). There are approximately 15 PVC production facilities, which are owned and operated by the PVC production industry. None of the 15 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 are an average of 15 affected facilities 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, approximately 15 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate was provided by the Vinyl Institute, which noted that two PVC and copolymer production major sources have closed in the past three years, and that no new sources are being constructed as EPA re-evaluates the current standards.

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 PVC and copolymer production major source 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 HHHHHHHH.

### **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 these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 HHHHHHHH.

#### **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 15 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 Vinyl Institute (VI), at (202) 765-2200. The Vinyl Institute provided comments on the number of respondents, indicating closure of two facilities, and stated that there are no new sources were being constructed as EPA re-evaluates the current standards. The Vinyl Institute also provided updates to the cost of process vent testing and the number of thermal oxidizers to be tested.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as 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 the standard 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 PVC and copolymer production major source facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

<b>Standard (40 CFR Part 63, Subpart HHHHHHH)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Plastics Material and Resin Manufacturing	2821	325211

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	§ 63.9(b)
Notification of performance test with test plan	§ 63.9(e)
Notification of compliance status	§ 63.11985(a)
Notice of Inspection	§ 63.11985(c)(1)

<b>Reports</b>	
Compliance report	§ 63.11985(b)
Batch pre-compliance report	§ 63.11985(c)(2)

A source must keep the following records:

<b>Recordkeeping</b>	
A copy of each notification and report submitted to comply with this subpart	§ 63.11990(a)
Records of storage vessels	§ 63.11990(b)
Records of equipment leaks	§ 63.11990(c)
Records of heat exchanger systems	§ 63.11990(d)
Records of process vents	§ 63.11990(e) and § 63.11990(f)
Records of closed vent systems	§ 63.11930(g) and § 63.11990(g)
Records of resin strippers	§ 63.11990(h)
Records of process wastewater	§ 63.11990(i)
Keep records for five years	§ 63.11995(a)

### 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.

<b>Respondent Activities</b>
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 301, 303, 303A, 304B, 305, 306, 306A, 308, 312C, 315, 316, 319, 320, 321 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:

<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. 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**

There are no small entities (i.e., small businesses) affected by this regulation. 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHHH).

### **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 record-keeping and reporting requirements is estimated to be 338,000 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 Cost**

#### **(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 these regulations. 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**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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 Respondent	Number of Respondents with O&M	Total O&M, (E X F)
<b>Continuous Parameter Monitoring</b>						
PRD Electronic Monitor <sup>8</sup>	\$375,000	0	\$0	\$26,897	15	\$403,455
VC Ambient monitoring <sup>9</sup>				\$164,250	15	\$2,463,750
Gas holders	\$5,000	0	\$0			
<b>Periodic Testing</b>						
Process Vent Testing <sup>10</sup>	\$51,198	0	\$0	\$99,080	32	\$3,170,560
Resin Sampling and Monitoring <sup>1</sup>	\$1,803	0	\$0	\$7,212	15	\$108,180
Stripped resin: Non-VC TOHAP testing <sup>2</sup>	\$1,950	0	\$0	\$23,400	15	\$351,000
Wastewater Testing <sup>3</sup>	\$491	0	\$0	\$5,892	15	\$88,380
Wastewater: Non-VC TOHAP testing <sup>4</sup>	\$650	0	\$0	\$7,800	15	\$117,000
Uncontrolled Wastewater testing <sup>5</sup>	\$0	0	\$0	\$491	75	\$36,825
Uncontrolled wastewater: Non-VC TOHAP testing <sup>6</sup>	\$3,250	0	\$0	\$3,250	15	\$48,750
Equipment Leak Testing	\$77,798	0	\$0	\$18,205	15	\$273,075
<b>Total</b>						
			\$0			\$7,060,000

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

<sup>1</sup>Monthly testing (\$601 x 12 months = \$7,212 per year)

<sup>2</sup>Per VI's comments, the costs of Non-VC TOHAP testing is \$650 per sample, and 3 resin samples per facility.

<sup>3</sup>Monthly testing (\$491 x 12 months = \$5,892 per year)

<sup>4</sup>Per VI's comments, the costs of Non-VC TOHAP testing is \$650 per sample, and one sample per facility.

<sup>5</sup>Per VI's comments, there are 5 uncontrolled wastewater streams per source sampled annually.

<sup>6</sup>Per VI's comments, the costs of Non-VC TOHAP testing is \$650 per sample, and five samples per facility.

<sup>7</sup>15 facilities are expected to be required to increase stringency of their LDAR programs to 40 CFR Part 63, Subpart UU.

<sup>8</sup> Per VI's comments, the capital cost of the PRD monitor is \$15,000 per device, and it is assumed that 25 devices per facility require indicators.

<sup>9</sup> Per VI's comments, there are 71 GC monitors in the industry (3 area source and 15 major source) with an annual O&M cost of \$45,000 per monitor.

<sup>10</sup> Per VI's comments, the cost to test one thermal oxidizer in 2018 was \$99,080 and there are 32 thermal oxidizers in operation at 15 major source facilities

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$7,060,000. This is the total of column G in the above table.

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 \$7,060,000.

### **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 \$39,000.

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 government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH).

### **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 15 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number

of respondents, as shown in the table below, is 15 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	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	15	0	0	15
2	0	15	0	0	15
3	0	15	0	0	15
Average					15

<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 15.

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	1	0	0
Batch pre-compliance report	0	1	0	0
Notification of performance test with test plan	0	1	0	0
Notification of compliance status	0	1	0	0
Semiannual compliance report	15	2	0	30
Notice of Inspection	15	1	0	15
			Total	45

The number of Total Annual Responses is 45.

The total annual labor costs are \$38,400,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 in Tables 1 and 2 below, respectively, and summarized below.

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

The total annual labor hours are 338,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks, mainly 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, mainly 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 7,511 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are 7,060,000. 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 820 labor hours at a cost of \$39,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 a decrease in the burden hours in this ICR, compared to the previous ICR, due to a decrease in the number of respondents. The increase in labor costs from the most-recently approved ICR is due to adjustment in labor rates. All burden calculations have been updated

using the latest labor rates from the Bureau of Labor Statistics.

In addition, there is an increase in operation and maintenance costs due to updated cost estimates for process vent testing, which were provided by the Vinyl Institute.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7,511 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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-2014-0101. 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-2014-0101 and OMB Control Number 2060-0666 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.



a) Process Vents <sup>c,d,e</sup>	8	1	8	0	0	0	0	\$0
4) Continuous parameter monitoring								
a) Initial capital costs (PRD Electronic Monitor) <sup>c,i,k</sup>	524	1	524	0	0	0	0	\$0
b) Annualized capital and O&M costs (PRD Electronic Monitor) <sup>k</sup>	24	1	24	5	120	6.00	12.00	\$15,719.04
5) Other requirements								
a) equipment openings, initial measurement <sup>c,o</sup>	1.5	1	1.5	0	0	0	0	\$0
b) equipment openings, daily measurement <sup>o</sup>	1.5	350	525	15	7,875	393.75	787.5	\$1,031,562
c) gasholders <sup>c,p</sup>	24	1	24	0	0	0	0	\$0
d) storage vessels <sup>c,q</sup>	40	1	40	0	0	0	0	\$0
e) bypasses, initial requirement <sup>c,r</sup>	40	1	40	0	0	0	0	\$0
f) bypasses, ongoing inspection <sup>r</sup>	1	12	12	15	180	9	18	\$23,578.56
C Create Information	Incl. in 3.B							
D Gather Information	Incl. in 3.E							
E. Report Preparation								
1) Initial Notification <sup>c,d</sup>	5	1	5	0	0	0	0	\$0
2) Batch precompliance report <sup>c,d</sup>	5	1	5	0	0	0	0	\$0
3) Notification of performance test with test plan <sup>c,d</sup>	10	1	10	0	0	0	0	\$0
4) Notification of compliance status <sup>c,d</sup>	20	1	20	0	0	0	0	\$0
5) Compliance report <sup>d,k</sup>	40	2	80	15	1,200	60	120	\$157,190.40
6) Notice of inspection <sup>d</sup>	5	1	5	15	75	4	8	\$9,824.40
<b>Subtotal for Reporting Requirements <sup>m</sup></b>						<b>335,895</b>		<b>\$38,260,536</b>
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	Incl. in 3.A							
B. Implement Activities	N/A							
C. Develop Record System	N/A							

D. Record Information								
1) Records of process vent requirements <sup>d</sup>	10	1	10	15	150	8	15	\$19,648.80
2) Records of resin stripper requirements <sup>d</sup>	15	1	15	15	225	11	23	\$29,473.20
3) Records wastewater requirements <sup>d</sup>	15	1	15	15	225	11	23	\$29,473.20
4) Records of storage vessel requirements <sup>d</sup>	10	1	10	15	150	8	15	\$19,648.80
5) Records of equipment leak requirements <sup>d</sup>	25	1	25	15	375	19	38	\$49,122.00
6) Records of heat exchanger requirements <sup>d</sup>	10	1	10	15	150	8	15	\$19,648.80
7) Records of other emission sources requirements <sup>d</sup>	10	1	10	15	150	8	15	\$19,648.80
E. Personnel Training	Incl. in 3.B							
F. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>1,639</b>		<b>187,000</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>e</sup></b>						<b>338,000</b>		<b>38,400,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>e</sup></b>								<b>7,060,000</b>
<b>GRAND TOTAL (rounded)<sup>e</sup></b>								<b>45,500,000</b>

## Footnote:

<sup>a</sup> Assumes that, over the next three years, approximately 15 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

<sup>b</sup> Labor rates are \$147.40 for managerial, \$117.92 for technical, and \$57.02 for clerical. These rates from the United States Department of Labor, Bureau of Labor Statistics, September 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.

<sup>c</sup> One-time only costs.

<sup>d</sup> Cost incurred by a facility regardless of the number of affected units at the plant.

<sup>e</sup> There are 15 major sources in the affected source category.

<sup>f</sup> 15 major sources are expected to perform testing for process vents. OxyVinyls (Pedricktown, NJ) does not operate a process vent control, but rather sends process vent gas streams to Mexichem (Pedricktown, NJ) for control. Likewise, the Wacker (Calvert City, KY) facility does not operate a process vent control device, but rather sends process vent gas streams to the Westlake (Calvert City, KY) facility for control. Per VI, it is assumed that performance testing for process vents will take 120 hours per occurrence initially. The initial compliance and operating procedure development for continuous compliance and will take 8 hours. The daily monitoring of parameters will take 5 min per record with 112 records a day across 33 devices in the industry. There are 3 area sources and 15 major sources are subject to this requirement. Therefore, the continuous/daily monitoring will take on average 17.1 hrs per facility per day over 350 day/yr.

<sup>g</sup> Per VI, it is assumed that performance testing for process vents will take 4 hours per sample for 9 samples per facility, initially and daily (350 days per year). See continuous monthly sampling & testing of Non-VC TOHAP in O&M section.

<sup>h</sup> Per VI, wastewater testing is estimated to take 4 hours per sample for 2 samples per facility. There are 16 wastewater streams for 17 major sources, yields 16/17 wastewater

streams per major source that are sampled monthly. There are 5 uncontrolled wastewater streams per source that are sampled annually. See Capital/O&M costs for non-VC TOHAP samples.

<sup>l</sup> Per VI, it is assumed that performance testing on heat exchangers will take 4 hours per sample for 2 samples per facility, initially and monthly, for 16 of the 17 major sources. One of the sources relies on another facility to cool the water.

<sup>j</sup> For Equipment leaks, VI estimates approximately 10,000 components per facility and 5 minutes per component, plus additional time calibration of analytical device for a total of 850 hrs per facility. For continuous monitoring, VI assumes 1 hr is required per component for leak repair, if detected. It was assumed that overall continuous compliance of leak monitoring will take 5% of the time with initial monitoring per month.

<sup>k</sup> Per VI, the initial performance testing for pressure relief devices (PRD), would take 524 hours per facility. Periodically, corrective action for discharge from a PRD would take 24 hours. It is estimated that 27% of the respondents would experience discharge from a PRD each year.

<sup>l</sup> Per VI, Estimated that semiannual compliance reports would take 40 technical hours twice per year.

<sup>m</sup> Reporting subtotal does not include capital costs for PRD monitoring system.

<sup>n</sup> It will take 8 employees 8 hours per person to read and understand the rule requirements.

<sup>o</sup> For Equipment openings, Per VI, 1.5 hrs to obtain measurement, initially, daily.

<sup>p</sup> Per VI, it will require 24 hrs to evaluate compliance options, order materials, monitor installation, and developing O&M procedures. Note: there are only 15 gas holders in the industry among major & area sources.

<sup>q</sup> Per VI, 40 hrs per facility to develop initial and ongoing compliance, inspection, and maintenance plans and procedures.

<sup>r</sup> Per VI, 40 hrs per facility for training, development, and implementation; and it will take 1 hr per month to inspect car seals per facility.

<sup>s</sup> 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal)**

Burden Item	(A)	(B)	(C)	(D)	(E) Technical person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.10 )	(H)
	EPA person- hours per occurrence	No. of occurrences per plant per year	EPA person- hours per plant per year (C=AxB)	Plant s Per Year <sup>a</sup>				EPA Cost Per Year <sup>b</sup>
1. Applications	N/A							
2. Familiarization with Rule Requirements	15	1	15	0	0	0	0	\$0
3. Required Activities								
A. Observe initial performance tests <sup>c</sup>	48	1	48	0	0	0	0	\$0
B. Excess emissions-- Enforcement Activities <sup>d</sup>	24	1	24	1.5	36	2	4	\$1,968.25
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review initial notification	3	1	3	0	0	0	0	\$0
2) Review batch pre-compliance report	5	1	5	0	0	0	0	\$0
3) Review notification of performance test	10	1	10	0	0	0	0	\$0
4) Review notification of compliance status	40	1	40	0	0	0	0	\$0
5) Review compliance report	20	2	40	15	600	30	60	\$32,804.10
6) Review notice of inspection	3	1	3	15	45	2	5	\$2,460.31
F. Prepare annual summary report <sup>e</sup>	4	1	4	8	32	2	3	\$1,749.55
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =						N/A	per trip	\$0
<b>TOTAL COST (rounded)<sup>f</sup></b>						820		\$39,000

## FOOTNOTES

- <sup>a</sup> Assumes that, over the next three years, approximately 15 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.
- <sup>b</sup> Labor rates are \$65.71 for managerial (GS-13, Step 5, \$41.07 + 60%), \$48.75 for technical (GS-12, Step 1, \$30.47 + 60%), and \$26.38 for clerical (GS-6, Step 3, \$16.49 + 60%). These rates 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 government employees.
- <sup>c</sup> Assumes EPA personnel attend 20 percent of the initial process vent stack tests.
- <sup>d</sup> Assume 10% of major source facilities (1.5) have emission exceedances.
- <sup>e</sup> Using 4 hours per state (8 states) to write annual summary report.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.