

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal), EPA ICR Number 2454.03, OMB Control Number 2060-0684.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) were proposed on May 20, 2011, and promulgated on April 17, 2012. These regulations apply to existing facilities and new PVC and copolymer production facilities that are an area source of hazardous air pollutants (HAP). This ICR includes burden estimates for area sources only. Major sources are regulated under NESHAP Subpart HHHHHHH and their burdens are included in a separate ICR (OMB Control Number 2060-0666). 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 DDDDDD.

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 PVC and copolymer area source 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 Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal). The Federal Government’s ‘burden’ 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 Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal). There are approximately 4 facilities, which are owned and operated by the PVC and copolymer production industry. None of the 4 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.

Over the next three years, approximately 4 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same 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, HAP emissions from PVC and copolymer production area 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 DDDDDD.

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 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 either the Agency or its 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 DDDDDD.

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 the standard, 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 4 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations 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 both the Vinyl Institute (VI), at (202) 765-2200, and the Occidental Chemical Corporation (OxyVinyls Deer Park, TX PVC facility), at (972) 404-3800.

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 PVC and copolymer production area source facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 2821 which corresponds to the North American Industry Classification System (NAICS) code 325211 for Plastics Material and Resin 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 Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD).

A source must make the following reports:

Notifications	
Initial notification	§ 63.9(b)
Notification of compliance status	§ 63.11142(f)(18)
Notification of performance test	§ 63.9(e)
Notification of inspection	§ 63.11142(f)(18)

Reports	
Compliance report	§ 63.11142(f)(18)
Batch pre-compliance report	§ 63.11142(f)(18)

A source must keep the following records:

Recordkeeping	
A copy of each notification and report submitted to comply with this subpart	§ 63.11142(f)(19)
Records of storage vessels	§ 63.11142(f)(19)

Recordkeeping	
Records of equipment leaks	§ 63.11142(f)(19)
Records of heat exchanger systems	§ 63.11142(f)(19)
Records of process vents	§ 63.11142(f)(19)
Records of closed vent systems	§ 63.11142(f)(9) and § 63.11142(f)(19)
Records of resin strippers	§ 63.11142(f)(19)
Records of process wastewater	§ 63.11142(f)(19)
Records of other emissions sources	§ 63.11142(f)(19)
Keep records for five years	§ 63.11142(f)(19)

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.
Install, calibrate, maintain, and operate CMS for flow, temperature, pressure drop, liquid supply pressure, pH, caustic strength, or conductivity for control devices.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C, 2D, 2F, or 2G; 3, 3A, or 3B; 4 or 320; 25A or 18; 308; 316; 204 and 204A – 204F tests, SW-846-8260B, SW-846-8270D, SW-846-8315A, SW-846-8015C and Method 107 for resin and wastewater, 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for 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
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. The EPA and its delegated Authorities can edit, store, retrieve and analyze this 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. The PVC NESHAP does not contain any provisions reserved exclusively for the benefit of small entities; however, there are provisions that reduce the impact on all regulated entities, which would include any small entities. 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 Area Sources (40 CFR Part 63, Subpart DDDDDD) (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 record-keeping and reporting requirements is estimated to be 92,300 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 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous Parameter Monitoring						
PRD Electronic Monitor ¹	\$375,000	0	\$0	\$31,772	4	\$127,088
VC Ambient Monitoring ²	NA	0	\$0	\$164,250	4	\$657,000
Gasholder ³	\$5,000	0	\$0	NA	4	\$0
Periodic Testing						
Process Vent Testing	\$43,198	0	\$0	\$99,080	4	\$396,320
Resin Sampling and	\$1,803	0	\$0	\$7,212	4	\$28,848

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Monitoring ⁴						
Resin: Non-VC TOHAP testing ⁵	\$1,950	0	\$0	\$23,400	4	\$93,600
Wastewater Testing ⁶	\$491	0	\$0	\$5,892	4	\$23,568
Wastewater Testing: Non-VC TOHAP testing	\$650	0	\$0	\$7,800	4	\$31,200
Uncontroll ed Wastewater testing	\$0	0	\$0	\$491	4	\$1,964
Uncontroll ed Wastewater testing: Non-VC TOHAP testing ⁷	\$3,250	0	\$0	\$3,250	4	\$13,000
Equipment Leak Testing	\$177,360	0	\$0	\$16,105	4	\$64,420
Total (rounded)			\$0			\$1,440,000

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

¹ The capital cost of the PRD monitor is \$15,000 per device, and it is assumed that 25 devices per facility require indicators.

² Assumes an average of 3.65 GC monitors per facility with an annual cost of \$45,000 per monitor for vinyl chloride. The average cost per facility is therefore \$164,250.

³ The estimated installation cost for gasholder is \$5,000. It is estimated there are only 15 gasholders in the industry across both major and area source facilities.

⁴ Monthly testing (assumes \$601 x 12 months = \$7,212 per year)

⁵ The cost of Non-VC TOHAP testing is \$650 per sample, at three samples per facility.

⁶ Monthly testing (assumes \$491 x 12 months = \$5,892 per year)

⁷ The cost of Non-VC TOHAP testing is \$650 per sample, and five samples per facility.

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 \$1,440,000. 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 \$1,440,000. 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 \$9,840.

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 Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (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 four 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 four 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	0	4	0	0	4
2	0	4	0	0	4
3	0	4	0	0	4
Average	0	4	0	0	4

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 4.

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
1) Initial Notification	0	1	0	0
2) Batch pre-compliance report	0	1	0	0
3) Notification of performance test with test plan	0	1	0	0
4) Notification of compliance status	0	1	0	0
5) Semiannual compliance report	4	2	0	8
6) Notice of inspection	4	1	0	4
			Total	12

The number of Total Annual Responses is 12.

The total annual labor costs are \$10,500,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (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 92,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (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 7,690 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,440,000. 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 207 labor hours at a cost of \$9,840; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDDD) (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 burden labor hours and cost in this ICR compared to the previous ICR. This increase is not due to any program changes. There is an adjustment increase in burden from the most recently-approved ICR due to an increase in the number of respondents to reflect one additional existing facility. There is also an adjustment increase to the operation and maintenance costs due to the additional respondent, as well as an increase in the estimated cost for testing thermal oxidizers for process vents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7,690 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-2014-0104. 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-2014-0104 and OMB Control Number 2060-0684 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 Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Respondent Hours per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year ^a	Technical Hours Per Year (D x E)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.1)	Total Labor Costs Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements								
New sources ^{c,d,l}	320	1	320	0	0	0	0	\$0
Existing sources ^e	8	1	8	4	32	1.6	3.2	\$4,191.74
B. Required Activities								
1) Initial performance test, sampling, and report								
a) Process Vents ^{c,f}	120	1	120	0	0	0	0	\$0
b) Resins ^{c,g}	36	1	36	0	0	0	0	\$0
c) wastewater ^{c,h}	8	1	8	0	0	0	0	\$0
d) uncontrolled wastewater ^h	40	1	40	0	0	0	0	\$0
e) heat exchangers ⁱ	8	1	8	0	0	0	0	\$0
f) equipment leaks ^j	850	1	850	0	0	0	0	\$0
2) Periodic performance test, sampling, and report								
a) Process Vents ^f	17.1	350	5,985	4	23,940	1,197.00	2,394.00	\$3,135,948.48
b) Resins ^g	36	350	12,600	4	50,400	2,520	5,040	\$6,601,996.80
c) wastewater ^{r,h}	8	12	96	4	384	19.2	38.4	\$50,300.93
d) uncontrolled wastewater ^h	40	1	40	4	160	8	16	\$20,958.72
e) heat exchangers ⁱ	8	12	96	4	384	19.2	38.4	\$50,300.93
f) equipment leaks ^j	43	12	510	4	2,040	102	204	\$267,223.68
3) Establish operating parameters and monitoring plan								
a) Process Vents ^{c,d,f}	8	1	8	0	0	0	0	\$0
4) Continuous parameter monitoring								
a) Initial capital costs (PRD Electronic Monitor) ^{c,k}	524	1	524	0	0	0	0	\$0
b) Annualized capital and O&M costs (PRD Electronic Monitor) ^k	24	1	24	1.08	25.92	1.30	2.59	\$3,395.31
5) Other requirements								
a) equipment openings, initial measurement ^m	1.5	1	1.5	0	0	0	0	\$0

b) equipment openings, daily measurement ^m	1.5	350	525	4	2,100	105	210	\$275,083.20
c) gasholders ^m	24	1	24	0	0	0	0	\$0
d) storage vessels ^m	40	1	40	0	0	0	0	\$0
e) bypasses, initial requirement ^m	40	1	40	0	0	0	0	\$0
f) bypasses, ongoing inspection ^m	1	12	12	4	48	2.4	5	\$6,287.62
C. Create Information	See 3.B							
D. Gather Information	See 3.E							
E. Report Preparation								
1) Initial Notification ^{c,d}	5	1	5	0	0	0	0	\$0
2) Batch precompliance report ^{c,d}	5	1	5	0	0	0	0	\$0
3) Notification of performance test with test plan ^{c,d}	10	1	10	0	0	0	0	\$0
4) Notification of compliance status ^{c,d}	20	1	20	0	0	0	0	\$0
5) Compliance report ^d	40	2	80	4	320	16	32	\$41,917.44
6) Notice of inspection ^d	5	1	5	4	20	1	2	\$2,619.84
Reporting Subtotal						91,832		\$10,460,224.69
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 3.A							
B. Implement Activities	N/A							
C. Develop Record System	N/A							
D. Record Information								
1) Records of process vent requirements ^d	10	1	10	4	40	2	4	\$5,239.68
2) Records of resin stripper requirements ^d	15	1	15	4	60	3	6	\$7,859.52
3) Records of wastewater requirements ^d	15	1	15	4	60	3	6	\$7,859.52
4) Records of storage vessel requirements ^d	10	1	10	4	40	2	4	\$5,239.68
5) Records of equipment leak requirements ^d	25	1	25	4	100	5	10	\$13,099.20
6) Records of heat exchanger requirements ^d	10	1	10	4	40	2	4	\$5,239.68
7) Records of other emission sources requirements	10	1	10	4	40	2	4	\$5,239.68
E. Personnel Training	See 3.B							
F. Time for Audits	N/A							
Recordkeeping Subtotal						437		\$49,776.96
TOTAL LABOR BURDEN AND COSTS (rounded):^a						92,300		\$10,500,000
TOTAL CAPITAL AND O&M COSTS (rounded):^b								\$1,440,000
GRAND TOTAL (rounded):^c								\$11,900,000

^a Assumes that, over the next three years, approximately 4 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

^b 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.

^c Costs apply only to newly-applicable sources.

^d Cost incurred by a facility regardless of the number of affected units at the plant.

^e There are 4 area sources in the affected source category.

^f 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 on avg 17.1 hr per facility per day over 350 day/yr.

^g 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.

^h Estimated 1 uncontrolled stream and 1 wastewater stripper per facility. 1 wastewater stripper outlet is expected to require monthly testing; 5 uncontrolled streams will require annual testing (per facility). It will take 4 hours per sample for 2 samples per stream.

ⁱ It is assumed that performance testing on heat exchangers will take 4 hours per sample for 2 samples per facility, initially and monthly.

^j For equipment leaks, we estimate approx 10,000 components per facility and 5 minutes per component, plus additional time calibration of analytical device for a total of 850 hr per facility. For continuous monitoring, we assume 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.

^k We assume 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.

^l It will take 8 employees 40 hours per person to read and understand the rule requirements.

^m We have included this item based on comments previously provided by the Vinyl Institute.

ⁿ 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 Area Sources (40 CFR Part 63, Subpart DDDDDD) (Renewal)

Burden Item	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants Per Year ^a	(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 Cost Per Year ^b
1. Applications	not applicable							
2. Familiarize with Rule Requirements	16	0	0	0	0	0	0	\$0
3. Required Activities								
A. Observe initial performance tests ^c	48	0	0	0	0	0	0	\$0
B. Excess emissions -- Enforcement Activities ^d	24	0	0	0	0	0	0	\$0
C. Create Information	not applicable							
D. Gather Information	not applicable							
E. Report Reviews								
1) Review initial notification	3	0	0	0	0	0	0	\$0
2) Review batch precompliance report	5	0	0	0	0	0	0	\$0
3) Review notification of performance test	10	0	0	0	0	0	0	\$0
4) Review notification of compliance status	40	0	0	0	0	0	0	\$0
5) Review compliance report	20	2	40	4	160	8	16	\$8,747.76
6) Review notice of inspection	3	1	3	4	12	0.6	1.2	\$656.08
F. Prepare annual summary report ^e	8	1	8	1	8	0.4	0.8	\$437.39
TOTAL (rounded) ^f						207		\$9,840

^a Assumes that, over the next three years, approximately 4 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

^b 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.

^c Assumes EPA personnel attend 20 percent of the initial process vent stack tests.

^d Assumes no emissions exceedances.

^e Assumes four hours per state to write annual summary report.

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