

Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Preparations Ind

Burden Items	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year
1. Familiarization with the regulatory requirements	4	1
2. Required activities		
a. Initial performance tests ^{c, d}	8	1
b. Engineering calculations or performance guarantees ^{d, e}	8	1
c. Continuous parameter monitoring ^{e, f}	8	1
3. Reporting requirements		
a. Initial notification that existing facilities are subject to the standard ^{c, g}	4	1
b. Notification of new area sources ^c		
(1) Notification of intent to construct/reconstruct	4	1
(2) Notification to commence construct/reconstruct	4	1
(3) Notification of startup	4	1
c. Request for compliance extension ^h	4	1
d. Notification of initial performance test ^{c, d}	2	1
e. Notification of compliance status ^c	4	1
f. Gather information for semiannual reports ⁱ	4	2
g. Semiannual compliance reports ⁱ	4	2
Subtotal for Reporting Requirements		
4. Recordkeeping Requirements		
a. Develop a record system ^c	4	1
b. Develop a monitoring plan ^c	4	1
c. Implement activities		
(1) Record performance tests ^c	1	1
(2) Record periods of target HAP service and deviations	0.5	52
(3) Continuous parameter monitoring system inspections, calibration and maintenance ^j	1	12
(4) Vent collection systems and control inspections	1	12
d. Store, file and maintain records	4	1
5. Time to train personnel	4	1
6. Prepare for and participate in audits	0	0
Subtotal for Recordkeeping Requirements		
TOTAL Labor Burden and Costs (rounded) ^k		
TOTAL Capital and O&M Costs (rounded) ^k		
GRAND TOTAL (rounded) ^k		

Assumptions:

- ^a We have assumed that there are approximately 26 respondents subject to the rule, with no new sources expected
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; ^c are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers Compensation.” The rates have been increased by 110% to account for the benefit packages available to those emp
- ^c We assume that this is a one-time only activity for new facilities.

^d One-time activity for new and existing facilities after promulgation of final rule. We assume that performance test emission limits. Instead we assume that 50 percent of the industry will have existing performance tests that demonstrate performance guarantees or engineering calculations to demonstrate compliance.

^e We assume that all existing facilities will use their existing continuous parameter monitoring equipment or alarm.

^f There is no additional burden for new monitoring equipment because additional add-on control devices are not required. They are already equipped with equipment to monitor existing control device parameters.

^g Existing facilities must submit notification that they are subject to the standard within 120 days of the effective date.

^h We assume that compliance extensions will not be necessary.

ⁱ We assume that all respondents will have deviations requiring submittal of compliance reports semi-annually. We assume that respondents will have to prepare reports year to year.

^j We have assumed that each respondent will take 1 hour 12 times per year to implement the continuous parameter monitoring equipment.

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

ustry (40 CFR Part 63, Subpart BBBBBBB) (Renewal)

(C) Hours per Respondent per Year (A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05) ^a	(G) Clerical Hours per Year (Ex0.1) ^a	(H) Total Labor Costs per Year, \$ ^b
4	26	104	5.2	10.4	\$13,623.17
8	0	0	0	0	\$0
8	0	0	0	0	\$0
8	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
8	26	208	10.4	20.8	\$27,246.34
8	26	208	10.4	20.8	\$27,246.34
			598		\$68,115.84
4	0	0	0	0	\$0
4	0	0	0	0	\$0
					\$0
1	0	0	0	0	\$0
26	26	676	33.8	67.6	\$88,550.59
12	26	312	15.6	31.2	\$40,869.50
12	26	312	15.6	31.2	\$40,869.50
4	26	104	5.2	10.4	\$13,623.17
4	0	0	0	0	\$0
0	0	0	0	0	\$0
			1,615		\$183,912.77
			2,210		\$252,000
					\$390
					\$252,000

Labor Re
Management
Technical
Clerical

over the next three-years of this ICR.
 \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates
 ;, by Occupational and Industry group.” The rates are from column 1, “Total
 uly by private industry.

ists are not required for any of the existing facilities to demonstrate compliance with the
strate compliance with the emission limits, and the other 50 percent will use

is to demonstrate continuous compliance.

xpected to be needed to demonstrate compliance with the emission limits and facilities

late of final rule (December 30, 2009).

assume that semiannual compliance reports will take each respondent 4 hours twice per

monitoring system inspections, calibration and maintenance activity.

ates
\$147.40
\$117.92
\$57.02

Notes:
Updated 2/28/19 to match the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2

hr/resp

. Civilian Workers, by occupational and industry group

Table 2: Average Annual EPA Burden and Cost – NESHP for Chemical Preparations Industry (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurren ces per Plant per Year	(C) EPA Hours per Plant per Year (AxB)	(D) Plants per Year ^a
1. Familiarization with the regulatory requirements	2	1	2	0
2. Required activities				
a. Initial performance tests ^{c, d, e}	8	1	8	0
b. Review initial performance test reports, performance guarantees, engineering	4	1	4	0
c. Enter and update information into agency recordkeeping system	1	1	1	0
3. Excess emissions – enforcement activities ^f	N/A			
4. Notification requirements				
a. Review initial notification that existing facilities are subject to the standard ^{c, g}	1	1	1	0
b. Notifications for new area sources ^h				
(1) Review notification of intent to construct/reconstruct	4	1	4	0
(2) Review notification of commencement of construction/reconstruction	2	1	2	0
(3) Review notification of startup	2	1	2	0
c. Review request for compliance extension ⁱ	2	1	2	0
d. Review notification of initial performance tests ^{c, d, e}	1	1	1	0
e. Review notification of compliance status ^{c, j}	4	1	4	0
5. Reporting requirements – review semiannual compliance reports ^k	4	2	8	6.5
TOTAL (rounded) ^l				

Assumptions:

^a We have assumed that there are approximately 26 respondents subject to the rule, with no new sources expected over the next three years. The NESHP rules are located in 13 States.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government rates: \$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 (from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay).

^c We assume that this is a one-time only cost.

^d We assume that EPA technical personnel will observe all performance tests conducted by new sources.

^e We have assumed that not emission tests will need to be performed. Facilities will utilize existing performance tests, perform initial compliance

^f We have assumed that there would be no enforcement activities for the 3-year period covered by this ICR.

^g We assume that existing area source facilities must submit notification that they are subject to and the standard within 120 days of the rule (December 30, 2009).

^h There are no new sources expected over the next three years of this ICR.

ⁱ We have assumed that compliance extensions will not be necessary.

^j Assume that EPA technical personnel will review all of the initial compliance status notifications for new sources.

^k We assume that EPA technical personnel will review 25 percent of the semiannual compliance reports.

¹Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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(E) Technical EPA Hours per Year (Cx D)	(F) Managerial Hours per Year (Ex 0.05)	(G) Clerical Hours per Year (Ex 0.1)	(H) Cost per year, \$ ^b
0	0	0	\$0.00
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
52	2.6	5.2	\$2,843.02
60			\$2,840

Labor Rates	
Technical	\$65.71
Management	\$48.75
Clerical	\$26.38

Notes:
Updated 2/28/19 to mat

ext three-years of this ICR. Facilities subject to

ment overhead expenses: Managerial rate of
GS-6, Step 3, \$16.49 + 60%). These rates are

rmance guarantees, or engineering calculations to

days of the effective date of the final rule

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