

Number of Respondents

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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

Total Annual Responses

(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Notification of applicability	0	1	0
Notification of construction/reconstruction	0	1	0
Notification of actual startup	0	1	0
Notification of special compliance requirements	0	1	0
Notification of initial performance test	0	1	0
Notification of compliance status	0	1	0
Excess emissions report	1.6	2	0
Report of no excess emissions	6.4	2	0
Quality improvement plan	0	1	0
			Total

(E)
Total Annual Responses
$E=(B \times C)+D$
0
0
0
0
0
0
0
3.2
12.8
0
16

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
Baghouse Leak Detection	\$22,350	0	\$0	\$750	8	\$6,000
Total			\$0			\$6,000

Burden Items	(A) Person hours per occurrence	(B) Occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements ^c					
A. Familiarization with the regulatory requirements	4	1	4	8	32
B. Required Activities					
Initial performance test ^d	421	1	421	0	0
Repeat performance test ^{d,e}	421	0.2	84.2	0	0
Operations, maintenance, and monitoring plan ^f	40	1	40	0	0
COS Testing ⁿ				8	
HCl/HF Testing ⁿ				8	
Phenol and methanol testing ⁿ				8	
C. Create Information	See 3B				
D. Gather Existing Information	See 3B				
E. Write Reports					
Notification of applicability ^g	2	1	2	0	0
Notification of construction/ reconstruction ^g	2	1	2	0	0
Notification of actual startup ^g	2	1	2	0	0
Notification of special compliance requirements ^g	2	1	2	0	0
Notification of initial performance test ^g	2	1	2	0	0
Notification of compliance status ^g	2	1	2	0	0
Request for extension of compliance adjustment to time periods, and changes in information ^g	2	1	2	0	0
Report of performance test	See 3B				
Excess emissions report ^h	16	2	32	1.6	51.2
Report of no excess emission ⁱ	8	2	16	6.4	102.4
Quality improvement plan ^j	40	1	40	0	0
Subtotal for Reporting					
4. Recordkeeping Requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan Activities	See 3E				
C. Implement Activities	See 3E				
D. Develop Record System	See 3E				
E. Time to Enter Information					
Records of operating parameters and emissions ^k	4	52	208	8	1664
F. Time to transmit or disclose information ^l	0.25	2	0.5	8	4
G. Time to Train Personnel	N/A				
H. Time for Audits	N/A				

Subtotal for Recordkeeping					
Total Labor Burden and Cost (rounded) ^m					
Capital and O&M Cost (see Section 6(b)(iii)): ^m					
TOTAL COST: ^m					

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no additional of this ICR.
- ^b This ICR uses the following labor rates: \$147.40 for Managerial, \$117.92 for Technical, and \$57.02 for Clerical. These rates are from the Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2: Civilian Workers, by Occupational and Industry Group Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employees.
- ^c We have assumed that it will take each respondent 4 hours to familiarize with the regulatory requirements.
- ^d We have assumed that it will take 421 hours for each new respondent to complete an initial performance test based on the following hours per source +200 hours for calibration, retesting, sample analysis, etc) for a total of 421 hours.
- ^e We have assumed that 20% of respondents will have to repeat performance test due to failure.
- ^f We have assumed that each of the respondents will take 40 hours to prepare the operation, maintenance, and monitoring plan.
- ^g We have assumed that each of the respondents will take 2 hours to write reports.
- ^h We have assumed that 20% of respondents will each take 16 hours two times per year to write excess emission reports.
- ⁱ We have assumed that 80% of respondents will take 8 hours two times per year to complete the report for no excess emissions.
- ^j We have assumed that 10% of facilities are required to prepare a quality improvement plan each year.
- ^k We have assumed that each respondent will take 4 hours 52 times per year to enter information.
- ^l We have assumed that it will take each respondent 15 minutes (0.25 hours) two times per year to transmit or disclose information.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- ⁿ Performance tests must be completed once every five years. We estimate the annualized compliance testing costs are \$59,200 for HCl/HF test, \$10,400 for HCl/HF test, and \$14,400 for phenol/methanol test). See EPA-HQ-OAR-2010-1041-0171.pdf

147.4 57.02

(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year, \$ ^b
1.6	3.2	\$4,191.74
0	0	\$0
0	0	\$0
0	0	\$0
		\$34,400
		\$10,400
		\$14,400
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.56	5.12	\$6,706.79
5.12	10.24	\$13,413.58
0	0	\$0
213		\$83,512.12
83.2	166.4	\$217,970.69
0.2	0.4	\$523.97

1,918	\$218,494.66
2,130	\$302,000
	\$6,000
	\$308,000

133 hr per resp

new sources over the three-year period

es are from the United States
 ip.” The rates are from column 1, “Total
 ed by private industry.

ollowing: (1.7 sources per plant x 130

in.

ons.

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00 for all 8 facilities (\$34,400 for COS

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (Cx D)
Initial performance tests					
New or modified facility	40	1	40	0	0
Repeat performance tests					
A. Familiarization with the regulatory requirements ^c	40	0.2	8	0	0
Report review					
Notification of applicability	2	1		0	
Notification of construction/ reconstruction	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of special compliance requirements	1	1	1	0	0
Notification of initial performance test	2	1	2	0	0
Notification of compliance status	2	1	2	0	0
Request for extension of compliance, adjustment to time p	2	1	2	0	0
Quality improvement plan ^d	40	1	40	0	0
Operations, maintenance, and monitoring plan	40	1	40	0	0
Report of performance test	40	1	40	0	0
Excess emissions report ^e	20	2	40	1.6	64
Report of no excess emissions ^f	2	2	4	6.4	25.6
Review compliance test reports for COS for cupolas and formaldehyde, phenol, and methanol for collection/curing operations ^g	8	1	8	8	64
Total Labor Burden and Cost (rounded)^h					

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no additional respondents.
- ^b This ICR uses the following labor rates: \$65.75 for Managerial, \$48.75 for Technical, and \$26.38 for Clerical. These rates are based on the 2014 Bureau of Economic Analysis (BEA) Survey of Professional and Technical Occupations (SPTO) data.
- ^c We have assumed that 20% of respondents will fail the performance test.
- ^d We have assumed that it will take 40 hours to review the quality improvement plan report.
- ^e We have assumed that 20% of respondents will submit the excess emissions report and it will take 20 hours to review the report.
- ^f We have assumed that 80% of respondents will submit the report of no excess emissions and it will take 2 hours to review the report.
- ^g Assumes Agency will review all of the annual reports - including the new COS, phenol, and methanol emissions test reports.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

65.71 26.38

(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
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
3.2	6.4	\$3,499.10
1.28	2.56	\$1,399.64
3.2	6.4	\$3,499.10
177		\$8,400

ional new sources over the three-year period of this ICR.

rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

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