

Table 1: Annual Respondent Burden and Cost – NESHAP for Commercial Ethylene Oxide Sterilization Operations (40 CFR Part 63, Subpart O) (Renewal)

Burden Items	(A) Hours per occurrence	(B) Occurrenc es per year	(C) Hours per year (AxB)	(D) Responden ts per year ^a	(E) Technical hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	1	1	1	128	128
B. Required Activities					
Initial performance test ^c	200	1	200	2	400
Repeat performance test ^{c, d}	200	1	200	0.4	80
Preparation of site-specific test plan	Included Above				
C. Create Information	See 3B				
D. Gather Existing Information	See 3B				
E. Write Reports					
Notification of applicability ^e	2	1	2	2	4
Notification of construction/reconstruction ^e	2	1	2	2	4
Notification of actual startup ^e	2	1	2	2	4
Notification of initial performance test ^e	2	1	2	2	4
Notification of compliance status ^e	2	1	2	2	4
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0
Request for waiver ^f	6	1	6	0.2	1.2
Report for alternative method monitoring ^g	6	1	6	0.1	0.6
Report for performance test ^h	24	1	24	2	48
Reports for periods of noncompliance (including excess emissions) ⁱ	14	2	28	115	3,220
Subtotal for Reporting					
4. Recordkeeping Requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	See 3B				
E. Time to Enter Information					
Record of operating parameters and emissions ^j	0.1	365	36.5	115	4,198
Records of EO use ^k	0.6	12	7.2	12	86.4
F. Time to transmit or disclose information ^l	0.25	2	0.5	115	57.5
G. Train Personnel	N/A				
H. Time for Audits	N/A				
Subtotal for Recordkeeping					
Total Labor Burden and Costs (rounded) ^m					
Total Capital and O&M Cost (rounded) ^m					
Grand Total (rounded) ^m					

Assumptions:

^a There are an average of 128 respondents subject to the rule over the three-year period of this ICR. Two additional new s subject to the rule over the three-year period of this ICR.

- ^b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupation from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages a industry.
- ^c Assumes it will take 200 hours for each respondent to perform the initial and any repeat performance testing.
- ^d Assumes that 20 percent of respondents will have to repeat performance tests due to failure.
- ^e Assumes that it will take new respondents two hours to write each notification report.
- ^f Assumes that 10 percent of new facilities will request a waiver and that it will take 6 hours to write requests for waivers.
- ^g Assumes that 5 percent of new facilities will request an alternative monitoring method.
- ^h Assumes that it will take 24 hours to prepare performance test reports.
- ⁱ Assumes that 115 respondents will take 14 hours each to complete reports of periods of noncompliance, which includes € per year.
- ^j Assumes that 115 respondents will enter information on record of operating parameters and emissions 365 times per year
- ^k Assumes that 12 affected facilities are only required to record EO usage and that that each of the 12 respondents will record
- ^l Assumes that 115 respondents will submit reports twice per year.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Utilization and Fumigation

(F) Managerial hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total Cost per year, \$ ^b
6.4	12.8	\$17,048.32
20	40	\$53,276.00
4	8	\$10,655.20
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0	0	\$0
0.06	0.12	\$159.83
0.03	0.06	\$79.91
2.4	4.8	\$6,393.12
161	322	\$428,871.80
4,482		\$519,147.98
209.875	419.75	\$559,065.03
4.32	8.64	\$11,507.62
2.875	5.75	\$7,658.43
4,993		\$578,231.07
9,480		\$1,100,000
		\$698,000
		\$1,800,000

Technical	Management	Clerical
\$120.27	\$141.06	\$58.67

254 # responses
37 hr per resp

ources per year are expected to become

\$58.67 for clerical labor. These rates are
ditional and industry group.” The rates are
available to those employed by private

excess emissions. This will occur two times

.
ord EO use 12 times per year.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Commercial Ethylene Oxide Storage Operations (40 CFR Part 63, Subpart O) (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (CxD)
Initial performance tests					
New or modified facility ^c	40	1	40	2	80
Repeat performance tests					
New or modified facility ^d	40	1	40	0.4	16
Report Review					
New or modified facility					
Notification of applicability	2	1	2	2	4
Notification of construction/reconstruction ^e	2	1	2	2	4
Notification of actual startup ^e	2	1	2	2	4
Notification of initial performance test ^e	2	1	2	2	4
Notification of compliance status ^e	2	1	2	2	4
Request for extension of compliance, adjustment to time periods, and changes in information ^f	2	1	2	2	4
Request for waiver ^g	4	1	4	0.2	0.8
Request for alternative method/monitoring ^h	4	1	4	0.1	0.4
Report of performance test ⁱ	8	1	8	2	16
Report of periods of noncompliance (including excess emissions) ^j	8	2	16	23	368
Total (rounded)^k					

Assumptions:

^a There are an average of 128 respondents subject to the rule over the three-year period of this ICR. Two additional new respondents become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. The rates are based on the Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased to reflect benefit packages available to government employees.

^c Assumes that the Agency will take 40 hours to observe the initial performance test.

^d Assumes that 20 percent of new respondents will fail the performance test and will have to repeat it.

^e Assumes that the Agency will take two hours to review each notification report.

^f Assumes that the Agency will take two hours to review each request for extension of the compliance report.

^g The Agency assumes that 10 percent of new facilities will request a waiver.

^h The Agency assumes that 5 percent of new facilities will request an alternative method monitoring.

ⁱ Assumes that the Agency will take 8 hours to review the report of performance test results.

^j Assumes the Agency will review 20 percent of noncompliance reports and that it will take the Agency 8 hours to review

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

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(F) Managerial Hours per Year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year \$ b
4	8	\$4,435.68
0.8	1.6	\$887.14
0.2	0.4	\$221.78
0.2	0.4	\$221.78
0.2	0.4	\$221.78
0.2	0.4	\$221.78
0.2	0.4	\$221.78
0.2	0.4	\$221.78
0.04	0.08	\$44.36
0.02	0.04	\$22.18
0.8	1.6	\$887.14
18.4	36.8	\$20,404.13
581		\$28,000

Technical	Management	Clerical
\$49.44	\$66.62	\$26.75

changed this from 136 to 40 hours

sources per year are expected to

ese rates are from the Office of
sed by 60 percent to account for the

reports of periods of noncompliance.

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	2	114	12	1	127
2	2	115	12	1	128
3	2	116	12	1	129
Average	2	115	12	1	128

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of Applicability	2	1	0	2
Notification of Construction/Reconstruction	2	1	0	2
Notification of Actual Startup	2	1	0	2
Notification of Initial Performance Test	2	1	0	2
Notification of Compliance Status	2	1	0	2
Request for Waiver	0.2	1	0	0.2
Report for Alternative Method/Monitoring	0.1	1	0	0.1
Report for Performance Test	2	1	0	2
Reports for Periods of Noncompliance	115	2	12	242
			Total (rounded)	254

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

(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
Computer equipment and GC ¹	\$32,500	2	\$65,000	\$5,500

¹ Computer equipment and gas chromatograph (GC) are used to continuously monitor EO emissions to ae

ts

(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
115	\$633,000

eration room and back chamber Total

\$698,000