

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU)
(Proposed Amendments)
July 2019**

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments), EPA ICR Number 1974.09, OMB Control Number 2060-0488.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) were proposed on August 28, 2000, promulgated on June 11, 2002, and most recently amended on February 27, 2014. Amendments to the NESHAP are being proposed as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below).

These regulations apply to both the miscellaneous viscose processes source category and cellulose ethers productions source category that are major sources of hazardous air pollutant (HAP), that either emit or have the potential to emit any single HAP at a rate of 9.1 megagrams per year (Mg/yr) (10 tons per year [tpy]) or more, or any combination of HAP at a rate of 23 Mg/yr (25 tpy) or more. The miscellaneous viscose processes source category currently includes the cellulose food casing, cellophane, and cellulosic sponge industry sectors. (All facilities in the rayon industry sector, which had been part of the category, have shut down.) The cellulose ethers production source category includes the carboxymethyl cellulose, hydroxyethyl cellulose, hydroxypropyl cellulose, hydroxypropyl methyl cellulose, and methyl cellulose industry sectors. 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 UUUU.

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 failures to meet applicable standards, 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 this file for at least 5 years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority.

In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The proposed RTR amendments to the rule would eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add periodic performance testing; provide biofilter effluent conductivity as an alternative to monitoring pH; add electronic submittal of notifications, semiannual reports and performance test reports; and make technical and editorial changes. The remaining portions of the NESHAP would remain unchanged.

All of the cellulose products manufacturing facilities in the United States are owned and operated by the cellulose products manufacturing industry. None of these 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. The “burden” to the Affected Public may be found below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments). The Federal Government “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 Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

Over the next 3 years, an estimated eight respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. Of the eight existing sources, three are cellulose ether facilities; one is a cellulosic sponge facility; three are cellulose food casing facilities; and one is a cellophane operation.

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

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 23 Mg/yr (25 tpy) of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, HAP emissions from cellulose products manufacturing 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 UUUU in 2002.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT

standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA 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.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from cellulose products manufacturing facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using process changes and control technology. The notifications required in the 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 the

standards are being met.

Performance test reports are needed, as these are the Agency's record of a source's initial and ongoing capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Non-duplication, Consultations, and Other Collection Criteria

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

The ICR will be available for public review during the public comment period following publication of the proposed RTR amendments to Subpart UUUU in the *Federal Register*. The ICR for the final rule will respond to any ICR-related comments received.

3(c) Consultations

Stakeholder outreach occurred prior to proposal with industry. Further stakeholder and public input will occur through public comment on the proposed RTR amendments and follow-up meetings with interested stakeholders.

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 and the proposed RTR amendments 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 and the proposed RTR amendments 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 5 years. This is consistent with the General Provisions as applied to these standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 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. The EPA has found that the most flagrant violators have violations extending beyond 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of the 5-year maintenance requirement.

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

None of the reporting or recordkeeping requirements in these standards or the proposed RTR amendments contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements and the proposed RTR amendments are cellulose products manufacturing facilities. The North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the table below.

Standard (40 CFR Part 63, Subpart UUUU)	NAICS Codes
All Other Plastics Product Manufacturing	326199
Unlaminated Plastics Profile Shape Manufacturing	326121
Plastics Material and Resin Manufacturing	325211
Artificial and Synthetic Fibers and Filaments Manufacturing	325220
All Other Basic Organic Chemical Manufacturing	325199

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported are required by the NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) or would be required under the proposed RTR amendments. Subpart UUUU references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

Notifications	
Initial notifications	63.5575, 63.9(b)(1-5)
Notification of performance test	63.5575, 63.7(b), 63.9(e)
Notification of CMS performance evaluation	63.5575, 63.8(e), 63.9(g)
Notification of compliance status (including electronic submittal of results of performance test, CMS performance evaluation, or other initial compliance demonstration)	63.5575, 63.9(h)(1-6), 63.10(d)(2), 63.10(e)(2)
Notifications for equipment leaks	63.5575, 63.182(a)(1-2), 63.182(b), 63.182(c)(1-3), 63.1039(a)
Notifications for wastewater	63.5575, 63.146(a), 63.146(b), 63.151, 63.152(a)(1-3), 63.152(b)(1-5),

Reports	
Electronic submittal of semiannual reports	63.5580
Semiannual report - deviations/out-of-control operation	63.5580
Semiannual report - equipment leaks	63.5580, 63.182(a)(3), 63.182(a)(6), 63.182(d)

Reports	
	(2-4), 63.1039(b)
Semiannual report - wastewater	63.5580, 63.146(c-e), 63.152(a)(4-5), 63.152(c-e)
Semiannual report - changes in information	63.5580, 63.9(j)
Semiannual report - closed-vent system	63.5580, 63.148(j)(1)
Semiannual report - bypass lines	63.5580, 63.148(j)(2-3)
Semiannual report - heat exchanger systems	63.5580, 63.104(f)(2)(i-iv)
Semiannual report - storage vessel control device maintenance	66.5580

A source must keep the following records:

Recordkeeping	
Record retention	63.5590, 63.10(b)(1)
Records of documentation supporting initial notification and notification of compliance status	63.5585, 63.10(b)(2)(xiv)
Records of performance tests, CMS performance evaluations, and other initial compliance demonstrations	63.5585, 63.10(b)(2)(viii)
Records of site-specific monitoring plan	63.5515(b), 63.5545, 63.5580(c)(6), 63.5585, 63.8(c)(3), 63.8(c)(4)(ii), 63.8(d)(2), 63.10(c), 63.10(e)(1), 63.10(e)(2)(i)
Records of each CMS	63.5585, 63.8(f)(6)(i), 63.10(b)(2)(vi-xi), 63.10(c)
Records of closed-loop systems	63.5585
Records of nitrogen systems	63.5585
Records of material balances	63.5585
Records of calculations	63.5585
Records for extended cookout	63.5585
Records for equipment leaks	63.5585, 63.181, 63.1038
Records for wastewater	63.5585, 63.105, 63.147,

Recordkeeping	
	63.152(f-g)
Records for closed-vent systems	63.5585, 63.148(i)
Records for bypass lines	63.5585
Records for heat exchanger systems	63.5585, 63.104(f)(1)
Records for storage vessel control device maintenance	63.5585
Records for safety devices	63.5585, 63.5505(d)

Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data (e.g., continuous control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern cellulose products manufacturing facilities employ distributive controls on their manufacturing process and have integrated many of the compliance recordkeeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. Respondents would also be required to submit selected notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

(ii) Respondent Activities

The respondent activities required by Subpart UUUU are listed in the following table:

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS.
Perform performance test, using Reference Method 1 or 1A; 2, 2A, 2C, 2D, 2F, or 2G; 3, 3A, or 3B; 4; 15 (total sulfide); 18, 320, 25, or 25A (total organic HAP); 22 (visible emissions); and 624 (wastewater HAP), 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

Respondent Activities
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:

Agency Activities
Observe performance tests and repeat performance tests if necessary.
Conduct excess emissions enforcement activities.
Review notifications, including notifications of construction/reconstruction, actual startup, applicability of standard, performance test, CMS performance evaluation, and compliance status.
Review reports, including performance test reports, CMS performance evaluation reports, and semiannual compliance 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 entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO 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 the data. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

The records required by this regulation must be retained by the owner/operator for 5 years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation and its proposed RTR amendments. 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: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

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 3 years from these recordkeeping and reporting requirements and the proposed RTR amendments is estimated to be 7,256 hours (Total Labor Hours from Table 1). 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	\$139.63 (\$66.49 + 110%)
Technical	\$119.47 (\$56.89 + 110%)
Clerical	\$58.15 (\$27.69 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 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 these subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring, performance testing, and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup costs for continuous monitoring systems (CMS) and the purchase of stack testing services. The annual operation and maintenance costs are the ongoing costs to maintain the monitors.

(iii) Capital/Startup Costs

We estimate that operation and maintenance (O&M) costs to maintain monitors are already included in the costs of existing monitors. We estimate that O&M costs to maintain monitors are already included in the costs of existing monitors.

(A) Cost Item	(B) Capital/Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost, (B X C)
Performance tests:			
Method 15 for total sulfide	\$14,000	13	\$182,000
Method 18 for organic HAP	\$14,000	19	\$266,000
Method 25D for wastewater organic HAP	\$14,000	3	\$42,000
Total capital/startup cost			\$490,000
Total annualized capital cost ^a			\$119,511

^a Annualized capital costs were estimated assuming a 5-year payment period at 7% interest for periodic performance tests (with capital recovery factor of 0.2439).

The total capital/startup costs for this ICR are \$490,000. This is the total of column D in the above table. The annualized capital/startup costs are \$119,511.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes activities such 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 3 years of the ICR is estimated to be \$13,224. 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), January 2019 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 Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next 3 years, an estimated eight 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 eight per year.

The number of respondents is calculated using the following table that addresses the 3 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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

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 3-year period of this ICR is eight.

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
Notification of performance test	2	1	0	2
Notification of CMS performance evaluation	2	1	0	2
Notification of compliance status	2.7	1	0	2.7
Semiannual report - no deviations	6.4	2	0	12.8
Semiannual report – deviations	1.6	2	0	3.2
Semiannual report - equipment leaks	3	2	0	6

Total Annual Responses				
Semiannual report – wastewater	3	2	0	6
Semiannual report - all others	8	2	0	16
			Total	51

The number of Total Annual Responses is 51, all of which will be submitted electronically.

The total annual labor costs are \$834,489. Details regarding these estimates may be found below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

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 7,256 at a cost of \$834,489. Details regarding these estimates may be found below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 143 hours per response.

The total annual capital/startup costs to the regulated entities are \$119,511 at 7 percent interest. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next 3 years is estimated to be 278 labor hours at a cost of \$13,224; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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

This ICR is prepared for proposed RTR amendments to the NESHAP for Cellulose Products Manufacturing (40 CFR, Part 63, Subpart UUUU). These proposed RTR amendments would: (1) adjust references to the Part 63 General Provisions (40 CFR Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart UUUU) to eliminate the SSM exemption and SSM plan requirement; (2) add periodic performance testing; (3) provide biofilter effluent conductivity as an alternative to monitoring pH; (4) add electronic submittal of notifications, semiannual reports and performance test reports; and (5) make technical and editorial changes. Where applicable, adjustments for these proposed RTR amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed from the estimate in the 2018 ICR renewal because of (1) continued consolidation and closures within the cellulose products manufacturing industry; and (2) updates to the number of affected facilities based on EPA's recent RTR efforts and subsequent updates from other information sources.

In addition, the burden estimate for familiarizing with regulatory requirements was increased to reflect the actual time it would take industry to review the proposed amendments. Burden estimates were added for the industry to prepare for/attend periodic performance tests and record failures to meet standards and actions taken to minimize emissions. Burden estimates were removed for developing SSM plans, submitting periodic SSM reports, and keeping records for extended cookout (since the only facility that used that option has shut down its cellulose ether operations).

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 143 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 not conduct or 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-OAR-2018-0415. 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 Building, 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-OAR-2018-0415 and OMB Control Number 2060-0488 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: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments)

					\$119.47	\$139.63	\$58.15	Labor Cost Per Hour
Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	8	1	8	2.7	21	1.1	2.1	\$2,822
B. Required activities ^d	N/A							
Prepare for periodic performance test	24	1	24	2	48	2.4	4.8	\$6,349
Attend periodic performance test	24	2	48	2	96	4.8	9.6	\$12,697
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/reconstruction ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of actual startup ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of applicability ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of performance test ^{f,g}	2	1	2	2	4	0.2	0.4	\$529
Notification of CMS performance evaluation ^{f,g}	2	1	2	2	4	0.2	0.4	\$529
Notifications for equipment leaks ^{e,f}	2	1	2	0	0	0	0	\$0
Notifications for wastewater ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of compliance status ^{g,h}	40	1	40	2.7	107	5.3	11	\$14,108
Semiannual report - no deviations ⁱ	8	2	16	6.4	102	5.1	10	\$13,544

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
Initial training ^{e,s}	40	1	40	0	0	0	0	\$0
Refresher training ^t	16	1	16	8	128	6.4	13	\$16,930
G. Time to transmit or disclose information ^u								
Compile data	24	2	48	8	384	19	38	\$50,790
Enter and verify information for semiannual report	16	2	32	8	256	13	26	\$33,860
H. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						4,519		\$519,750
TOTAL LABOR BURDEN AND COST						7,256		\$834,489
TOTAL CAPITAL AND O&M COST								\$119,511
GRAND TOTAL								\$954,000

Assumptions:

^a We estimate that there are 8 sources subject to the standard which includes the following facilities: 3 cellulose ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no new sources will become subject to the rule over the 3-year period of this ICR.

^b This ICR uses the following labor rates: \$139.63 per hour for Managerial labor; \$119.47 per hour for Technical labor, and \$58.15 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 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% to account for the benefit packages available to those employed by private industry.

^c We have assumed that is will take the respondents 8 hours to familiarize themselves with the regulatory requirements in the first year after publication of the RTR amendments (8 respondents/3 years = 2.7).

^d We estimate that it will take the respondent 24 hours to prepare for periodic performance test (e.g., prepare test plan) and 24 hours to attend the test. We also estimate 2 plant personnel will attend the test.

^e These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

^f We estimate that it will take the respondent 2 hours to complete the notification.

^g We estimate that 6 facilities will need to submit notification of performance test, conduct the test, and report the results through CEDRI. No performance test

required for the 2 cellulosic sponge and cellophane facilities because these facilities use recovery devices to meet the emission limit. These facilities are required to conduct a compliance demonstration based on the material balance for their process. The periodic testing will occur once during the 3-year ICR period (6 respondents/3 years = 2). All 8 facilities must submit a notification of compliance status with results of the performance test (8 respondents/3 years = 2.7).

^h We estimate that it will take each respondent 40 hours to prepare the notification of compliance status.

ⁱ We have assumed that 80% of respondents will report no deviation (0.8×8 respondents = 6.4).

^j We have assumed that 20% of respondents will report a deviation (0.2×8 respondents = 1.6).

^k We have assumed that it will take each respondent 303 hours on a semiannual basis to write reports for 3 cellulose ether facilities subject to leak detection and repair (LDAR) requirements.

^l All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, will be reported twice per year for all 8 facilities.

^m We have assumed that 5% of respondents will fail to meet standards each year ($0.05 \times 8 = 0.4$). We estimate that each respondent will take 2 hours 12 times per year to keep records of failures to meet the standards and the actions taken to minimize emissions..

ⁿ We estimate that it will take each respondent 1 hour to record information on a daily basis on process vent, storage tank and wastewater monitoring and inspections.

^o We estimate that it will take each respondent 2 hours to enter information on 1 cellulose ether facility with a closed-loop system.

^p We estimate that it will take each respondent 2 hours to enter information on 5 viscose process facilities with CS₂, unloading and storage operations.

^q We estimate that it will take each respondents 8 hours to enter information on 5 viscose process facilities using material balances.

^r We estimate that it will take each respondent 8 hours to enter information on supporting calculations twice per year.

^s We estimate that it will take each respondent 1 week (40 hours) to provide initial training to personnel with new sources.

^t We estimate that it will take each respondent 2 days (16 hours) to provide refresher training to personnel.

^u We have assumed that each respondent will enter and verify information for the semiannual report twice per year.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments)

					\$48.75	\$65.71	\$26.38	Labor Cost per Hour
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person- hours per occurrence	No. of occurrences per plant per year	EPA person hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Managem ent person- hours per year (F=Ex0.05)	Clerical person- hours per year (G=Ex0.1)	Cost, \$ ^b
Activity								
Attend performance test ^c	24	1	24	0.2	4.8	0.2	0.5	\$262
Excess emissions enforcement activities ^d	120	1	120	0.06	7.2	0.4	0.7	\$394
Review reports								
Notification of construction/reconstruction ^e	2	1	2	0	0	0	0	\$0
Notification of actual startup ^e	2	1	2	0	0	0	0	\$0
Notification of applicability ^e	2	1	2	0	0	0	0	\$0
Notification of performance test ^f	2	1	2	2	4	0.2	0.4	\$219
Notification of CMS performance evaluation ^f	2	1	2	2	4	0.2	0.4	\$219
Notification of compliance status ^g	4	1	4	2.7	11	0.5	1.1	\$583
Report of performance test ^h	8	1	8	2	16	0.8	1.6	\$875
Report of CMS performance evaluation ^h	8	1	8	2	16	0.8	1.6	\$875
Semiannual report - no deviations ⁱ	2	2	4	6.4	26	1.3	2.6	\$1,400
Semiannual report - deviations ^j	8	2	16	1.6	26	1.3	2.6	\$1,400
Semiannual report - equipment leaks ^k	8	2	16	3	48	2.4	4.8	\$2,624
Semiannual report - wastewater ^k	8	2	16	8	48	2.4	4.8	\$2,624
Semiannual report - other ^l	2	2	4	6.4	32	1.6	3.2	\$1,750
TOTAL ANNUAL BURDEN AND COST						278		\$13,224

Assumptions:

^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellulose ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no new sources will become subject to the rule each year over the 3-year period of this ICR.

^b This cost is based on the following hourly labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$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 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We estimate that it will take EPA personnel 24 hours to attend performance tests at 10% of facilities required to test (0.1×6 respondents/3 years = 0.2).

^d We estimate that 10% of the affected facilities will be required to retest as a result of deviations, and EPA personnel will attend 10% of these tests ($0.1 \times 0.1 \times 6$ respondents = 0.06).

^e We estimate that it will take EPA personnel 2 hours to complete review of the initial notifications (construction/reconstruction, actual startup, applicability of standard).

^f We estimate that it will take EPA personnel 2 hours to complete review of the notifications of performance test and CMS performance evaluation for facilities required to test (6 respondents/3 years = 2).

^g We estimate that it will take EPA personnel 4 hours to complete review of the notification of compliance status for all 8 facilities (8 respondents/3 years = 2.7).

^h We estimate that it will take EPA personnel 8 hours to complete review of the performance test and CMS performance evaluation data for facilities required to test (6 respondents/3 years = 2).

ⁱ We have assumed that 80% of respondents will report no deviations (0.8×8 respondents = 6.4) and that it will take EPA personnel 2 hours two times per year to review those reports.

^j We have assumed that 20% of respondents will report deviations (0.2×8 respondents = 1.6) and that it will take EPA personnel 8 hours two times per year to review those reports.

^k We estimate that it will take EPA personnel 8 hours two times per year to review the reports of 3 cellulose ether facilities subject to LDAR and wastewater requirements.

^l We estimate that it will take EPA personnel 2 hours two times per year to review all other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, for all 8 facilities.