

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products

Burden item	(A)	(B)
	Person hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Reporting Requirements		
A. Familiarize with regulatory requirements ^c	8	1
B. Required activities ^d		
Prepare for periodic performance test	24	1
Attend periodic performance test	24	2
C. Create information	See 3B	
D. Gather existing information	See 3B	
E. Write report		
Notification of construction/reconstruction ^{e,f}	2	1
Notification of actual startup ^{e,f}	2	1
Notification of applicability ^{e,f}	2	1
Notification of performance test ^{f,g}	2	1
Notification of CMS performance evaluation ^{f,g}	2	1
Notifications for equipment leaks ^{e,f}	2	1
Notifications for wastewater ^{e,f}	2	1
Notification of compliance status ^{g,h}	40	1
Semiannual report - no deviations ⁱ	8	2
Semiannual report - deviations ^j	16	2
Semiannual report - equipment leaks ^k	303	2
Semiannual report - wastewater	See 4E	
Semiannual report - other ^l	8	2
Subtotal for Reporting Requirements		
4. Recordkeeping requirements		
A. Familiarize with regulatory requirements	See 3A	
B. Plan activities	N/A	
C. Implement activities	N/A	
D. Develop record system	N/A	
E. Time to enter information		
Records of failures to meet standards/actions taken to minimize emissions ^m	2	12
Records of CMS data ⁿ	1	365
Records of closed-loop systems ^o	2	2
Records of nitrogen systems ^p	2	2
Records of material balances ^q	8	2
Records of supporting calculations ^r	8	2

Records for equipment leaks	See 3E	
All other records	See 3E	
F. Time to train personnel		
Initial training ^{e,s}	40	1
Refresher training ^t	16	1
G. Time to transmit or disclose information ^u		
Compile data	24	2
Enter and verify information for semiannual report	16	2
H. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
TOTAL ANNUALIZED CAPITAL AND O&M COST		
GRAND TOTAL		

Assumptions:

- ^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellulose ether, 3 cellulose ether, and 2 viscose process facilities.
- ^b This ICR uses the following labor rates: \$139.63 per hour for Managerial labor; \$119.47 per hour for Technical labor.
- ^c We have assumed that it will take the respondents 8 hours to familiarize themselves with the regulatory requirements.
- ^d We estimate that it will take the respondent 24 hours to prepare for periodic performance test (e.g., prepare test plan, conduct test, and report the results).
- ^e These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated in 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.
- ^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 all respondents will report no deviation (0.8 x 8 respondents = 6.4).
- ^j We have assumed that 20% of all respondents will report a deviation (0.2 x 8 respondents = 1.6).
- ^k We estimate that it will take each respondent 303 hours on a semiannual basis to write reports for 3 cellulose ether facilities and 2 viscose process facilities.
- ^l All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and other process facilities.
- ^m We have assumed that 5% of respondents will fail to meet standards each year (0.05 x 8 = 0.4). We estimate that it will take each respondent 1 hour to record information on a daily basis on process vent, storage tank, and other process facilities.
- ⁿ We estimate that it will take each respondent 2 hours to enter information on 1 cellulose ether facility with a closed-vent system.
- ^o We estimate that it will take each respondent 2 hours to enter information on 5 viscose process facilities with CS₂ monitoring.
- ^p We estimate that it will take each respondent 2 hours to enter information on 5 viscose process facilities using mass flow controllers.
- ^q We estimate that it will take each respondent 8 hours to enter information on 5 viscose process facilities using mass flow controllers.
- ^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.

Manufacturing (40 CFR Part 63, Subpart UUUU) (Proposed Amendments)

		\$119.47	\$139.63	\$58.15	Labor Cost Per Hour
(C)	(D)	(E)	(F)	(G)	(H)
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
8	2.7	21	1.1	2.1	\$2,822
24	2	48	2.4	4.8	\$6,349
48	2	96	4.8	9.6	\$12,697
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	2	4	0.2	0.4	\$529
2	2	4	0.2	0.4	\$529
2	0	0	0	0	\$0
2	0	0	0	0	\$0
40	2.7	107	5.3	11	\$14,108
16	6.4	102	5.1	10	\$13,544
32	1.6	51	2.6	5.1	\$6,772
606	3	1,818	91	182	\$240,458
16	8	128	6.4	13	\$16,930
		2,737			\$314,739
24	0.4	10	0.5	1.0	\$1,270
365	8	2,920	146	292	\$386,215
4	1	4	0.2	0.4	\$529
4	5	20	1	2	\$2,645
16	5	80	4	8	\$10,581
16	8	128	6.4	13	\$16,930

40	0	0	0	0	\$0
16	8	128	6.4	13	\$16,930
48	8	384	19	38	\$50,790
32	8	256	13	26	\$33,860
		4,519			\$519,750
		7,256			\$834,489
					\$119,511
					\$954,000

diethyl ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no abatement, and \$58.15 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics in the first year after publication of RTR amendments (8 respondents/3 years = 2.7). Each respondent will take 2 hours 12 times per year to keep records of failures to meet the standards and the actions taken. We also estimate 2 plant personnel will attend the test. Total cost is estimated over the 3-year period of this ICR.

Results through CEDRI. No performance test required for the 2 cellulosic sponge and cellophane facilities because these

facilities subject to leak detection and repair (LDAR) requirements. LDAR storage vessel control device maintenance, will be reported twice per year for all 8 facilities. Each respondent will take 2 hours 12 times per year to keep records of failures to meet the standards and the actions taken. Tank and wastewater monitoring and inspections. Closed-loop system. Unloading and storage operations. Material balances. Air. Sources.

No. of responses
0
0
0
2
2
0
0
2.7
12.8
3.2
6
6
16
51

Hours per response
143

new sources will become subject to the rule each year over the 3-year period of this ICR.

abor Statistics, December 2018, Table 2. Civilian Workers, by Occupational and Industry Group. The rates are from co

facilities use recovery devices to meet the emission limit. These facilities are required to conduct a compliance demons

en to minimize emissions..

lumn 1, Total Compensation. The rates have been increased by 110% to account for the benefit packages available to the

tration based on the material balance for their process. The periodic testing will occur once during the 3-year ICR period

ose employed by private industry.

(6 respondents/3 years = 2). All 8 facilities must submit a notification of compliance status with results of the performan

ce test (8 respondents/3 years = 2.7).

Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing

	(A)	(B)	(C)	(D)	(E)
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)
					\$48.75
Activity					
Attend performance test ^c	24	1	24	0.2	4.8
Excess emissions enforcement activities ^d	120	1	120	0.06	7.2
Review reports					
Notification of construction/reconstruction ^e	2	1	2	0	0
Notification of actual startup ^e	2	1	2	0	0
Notification of applicability ^e	2	1	2	0	0
Notification of performance test ^f	2	1	2	2	4
Notification of CMS performance evaluation ^f	2	1	2	2	4
Notification of compliance status ^g	4	1	4	2.7	11
Report of performance test ^h	8	1	8	2	16
Report of CMS performance evaluation ^h	8	1	8	2	16
Semiannual report - no deviations ⁱ	2	2	4	6.4	26
Semiannual report - deviations ^j	8	2	16	1.6	26
Semiannual report - equipment leaks ^k	8	2	16	3	48
Semiannual report - wastewater ^k	8	2	16	3	48
Semiannual report - other ^l	2	2	4	8	32
TOTAL ANNUAL BURDEN AND COST					

Assumptions:

^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellulose ether

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for govern

^c We estimate that it will take EPA personnel 24 hours to attend performance tests at 10% of facilities required to test (0.1 x

^d We estimate that 10% of the affected facilities will be required to retest as a result of deviations, and EPA personnel will at

^e We estimate that it will take EPA personnel 2 hours to complete review of the initial notifications (construction/reconstruct

^f We estimate that it will take EPA personnel 2 hours to complete review of the notifications of performance test and CMS p

^g We estimate that it will take EPA personnel 4 hours to complete review of the notification of compliance status for all 8 fac

^h We estimate that it will take EPA personnel 8 hours to complete review of the performance test and CMS performance eva

ⁱ We have assumed that 80% of respondents will report no deviations (0.8 x 8 respondents = 6.4) and that it will take EPA pe

^j We have assumed that 20% of respondents will report deviations (0.2 x 8 respondents = 1.6) and that it will take EPA persc

^k We estimate that it will take EPA personnel 8 hours two times per year to review the reports of 3 cellulose ether facilities s

^l We estimate that it will take EPA personnel 2 hours two times per year to review all other reports, including changes of info

ig (40 CFR Part 63, Subpart UUUU) (Proposed Amendments)

\$65.71	\$26.38	Labor Cost per Hour
(F)	(G)	(H)
Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0.2	0.5	\$262
0.4	0.7	\$394
0	0	\$0
0	0	\$0
0	0	\$0
0.2	0.4	\$219
0.2	0.4	\$219
0.5	1.1	\$583
0.8	1.6	\$875
0.8	1.6	\$875
1.3	2.6	\$1,400
1.3	2.6	\$1,400
2.4	4.8	\$2,624
2.4	4.8	\$2,624
1.6	3.2	\$1,750
278		\$13,224

r; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no new sources will
 ment overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.00 + 62.5%)
 6 respondents/3 years = 0.2).

end 10% of these tests (0.1 x 0.1 x 6 respondents = 0.06).

tion, actual startup, applicability of standard).

erformance evaluation for facilities required to test (6 respondents/3 years = 2).

ilities (8 respondents/3 years = 2.7).

uation data for facilities required to test (6 respondents/3 years = 2).

ersonnel 2 hours two times per year to review those reports.

nnel 8 hours two times per year to review those reports.

ubject to LDAR and wastewater requirements.

ormation, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, for all 8 fa

l become subject to the rule each year over the 3-year period of this ICR.

\$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel I

acilities.

Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

Word Count

Preamble	28,103
Amendatory	14,941
Total	43,044

Read/understand rule

43,044 words in FR package
100 words/min reading rate
430 min to read pkge

7 hrs to read pkge

bumped up to 8