

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**National Emission Standards for Hazardous Air Pollutants for Cellulose Products
Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)**

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) (Final Rule), EPA ICR Number 1974.11, OMB Control Number 2060-0488.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Cellulose Products Manufacturing (hereafter referred to as the NESHAP) was proposed on August 28, 2000, promulgated on June 11, 2002, and most recently amended on February 27, 2014. This supporting statement addresses information collection activities imposed by the Cellulose Products Manufacturing NESHAP, including both activities for which the burden has previously been approved and activities added based on the residual risk and technology review (RTR) required under the Clean Air Act (CAA). These information collection activities are required to assure compliance with 40 CFR Part 63, Subpart UUUU, as amended.

The NESHAP applies to each existing, reconstructed, and new Cellulose Products Manufacturing operation that is a major source of hazardous air pollutant (HAP) emissions or is collocated with other sources that are individually or collectively a major source of HAP emissions. A major source emits or has the potential to emit any single HAP at the rate of 10 tons (9.07 megagrams) or more per year, or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year.

The Cellulose Products Manufacturing source category comprises the miscellaneous viscose production source category and cellulose ether production source category. 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 the original proposal (August 28, 2000).

As part of the RTR amendments to the Cellulose Products Manufacturing NESHAP, the EPA eliminated the startup, shutdown, and malfunction (SSM) exemption; removed the SSM

plan requirement; added periodic performance testing; provided biofilter effluent conductivity as an alternative to monitoring pH; added electronic submittal of notifications, semiannual reports and performance test reports; and made other technical and editorial changes. The remaining portions of the NESHAP remain unchanged.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards; startup, shutdown, or malfunction in the operation of an affected facility; and any period during which a monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance and are required of all affected facilities subject to NESHAP. This ICR includes the burden for all activities that will be conducted in the first three years following promulgation of the RTR amendments to the Cellulose Products Manufacturing NESHAP. These activities include reading the rule and completing the recordkeeping and reporting requirements.

This ICR presents the burden to respondents and the Designated Administrator (i.e., U.S. EPA or a delegated authority) that will be imposed by the plans developed to implement the Cellulose Products Manufacturing NESHAP. Respondents are owners or operators of existing major source operations. The requirements described below are the minimum requirements established by the amended Cellulose Products Manufacturing NESHAP. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror those required by the Cellulose Products Manufacturing NESHAP.

Over the next 3 years, an estimated eight respondents per year will be subject to these standards, and no additional respondents per year are expected to 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. This estimate is based on research conducted by the EPA during the development of the RTR rulemaking. All 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. All reports are sent to the Designated Administrator. The required annual reports required of all affected facilities are used to determine periods of excess emissions, identify problems at the facility, and verify operation/maintenance procedures and for compliance determinations.

The average annual labor, capital, and operations and maintenance costs for the eight cellulose products manufacturing operations to respond to the NESHAP, including the RTR amendments, will be \$954,624. The average annual labor costs for the Agency or designated authority to implement the requirements in the NESHAP, including the RTR amendments) will be approximately \$13,224..

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 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 recordkeeping and reporting information will be used by Agency or delegated authority to ensure compliance with the applicable regulations, which were promulgated in accordance with the Clean Air Act. 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.

Performance tests are required to determine a facility's initial and ongoing capability to comply with the emission standard. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance. The performance tests serve as a record of the operating conditions under which compliance was achieved.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The required annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and to determine compliance. The Agency or delegated authority may then inspect the source to check that pollution control devices are properly installed and operated, that leaks are being detected and repaired and that the standard is being met. The performance test may also be observed.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart UUUU.

3(a) Nonduplication

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 Agency in lieu of the report required by the Federal standards. Therefore, no duplication of reporting exists.

3(b) Public notice prior to ICR submission to OMB

A public notice for this information collection request was provided in the *Federal Register* notice of proposed rulemaking titled the *National Emission Standards for Hazardous Air Pollutants for Cellulose Products Manufacturing Residual Risk and Technology Review* (84

FR 47346, September 9, 2019). No comments were received on the burden published in the *Federal Register*.

3(c) Consultations

The EPA reviewed internal data sources to determine current number of respondents and the reporting requirements applicable to each facility. The primary source of information was the EPA's Enforcement and Compliance History Online (ECHO), which is maintained by EPA's Office of Enforcement and Compliance. ECHO provides 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. ECHO allows users to conduct searches and obtain information on permits, inspections, violations, enforcement actions, and penalties. The Agency consulted with industry experts and stakeholders to determine the expected industry growth over the next three years. Industry trade associations and other interested parties were contacted and provided an opportunity to review and comment on the burden associated with the current standard as it was being developed, and the standard was previously reviewed to determine the minimum information needed for compliance purposes. As noted in the section above, we also provided a public comment period to allow all interested parties the opportunity to review and comment on the burden estimate.

3(d) Effects of Less Frequent Data Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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 were 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, including the 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, including the RTR amendments, contain sensitive questions.

4. The Respondents and The Information Requested

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements 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), as amended. Subpart UUUU references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP. The tables below reflect the final notification and reporting requirements after promulgation of the RTR amendments.

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)(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)

Recordkeeping	
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, 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.

The RTR amendments require respondents 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). The performance test data are required to be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site.

(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 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.

Agency Activities
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 is achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used to identify problems, check source operation and maintenance and to determine compliance with the NESHAP.

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. Refer to section 3(b) for further discussion about ECHO.

The records required by this NEHSAP must be retained by the owner/operator for five 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 the 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 of Attachment 1 (Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)).

6. Estimating The Burden And Cost Of The Collection

Table 1 of Attachment 1 presents the itemized burden for the recordkeeping and reporting requirements for respondents subject to the Cellulose Products Manufacturing NESHAP. The burden estimates are for the first three years following promulgation of the RTR amendments to the NESHAP. The individual burdens in Table 1 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 not conduct or 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 three years from the NESHAP recordkeeping and reporting requirements, including the RTR amendments, is estimated to be 7,256 hours (Total Labor Hours from Table 1 of Attachment 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 and the previously approved ICR.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Table 1 of Attachment 1. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) 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/Start-up and Operation and Maintenance Costs

The industry costs include 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 vs. Operation and Maintenance (O&M) Costs

The total capital/startup costs for the periodic performance tests are \$490,000. This is the total of column D in the following table. The annualized capital/startup costs are \$119,511 based on a 5-year payment period and 7% interest rate. The total operation and maintenance (O&M) costs to the industry per year are \$624. This is the total of column G.

Capital/Startup vs. O&M Costs						
(A) Cost Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Number of Respondents with O&M
Continuous Parameter Monitoring System	N/A	N/A	N/A	\$78	8	\$624
Performance tests:						
Method 15 for total sulfide	\$14,000	13	\$182,000	N/A	N/A	N/A
Method 18 for organic HAP	\$14,000	19	\$266,000	N/A	N/A	N/A
Method 25D for wastewater organic HAP	\$14,000	3	\$42,000	N/A	N/A	N/A
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).

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 three 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 of Attachment 1 (Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)).

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

Based on our research for this ICR, on average over the next three years, an estimated eight existing respondents will be subject to these standards. No new respondents are expected to become subject to this rule due to the RTR amendments. Additionally, it is estimated that no new sources are expected to start-up over the next three years. This estimate is based on the research conducted by the EPA during the development of the RTR rulemaking and included Agency review of various online databases and information sources, permits, and company websites.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR. 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. No new respondents are anticipated over the 3-year period of this ICR.

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

The total number of 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 of Attachment 1.

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 of Attachment 1, respectively, and summarized below.

(i) The 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 of Attachment 1.

Burdens for managerial tasks are assumed to 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.

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 and O&M costs to the regulated entities are \$119,511 at 7 percent interest for the annualized capital costs and \$624 for the annual O&M costs. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup Costs vs. Operator and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 278 labor hours at a cost of \$13,224; see below in Table 2 of Attachment 1.

The burdens for managerial tasks are assumed to 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

Changes in the estimated burden are due to: (1) the RTR amendments; (2) a change in the number of respondents; and (3) changes in labor rates.

The RTR amendments: (1) adjust references to the Part 63 General Provisions (40 CFR Part 63, Subpart A) and revise provisions in the NESHAP 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. The burden estimate for familiarizing with regulatory requirements was increased to reflect time needed by industry to review the RTR amendments, to prepare for and conduct periodic performance tests, and to record actions taken to minimize emissions. Burden estimates for developing SSM plans and submitting periodic SSM reports were removed. Burden estimates for keeping records of extended cookout were also removed since the only facility that used this option has shut down its cellulose ether operations. Adjustments for the RTR amendments are reflected in Tables 1 and 2 of Attachment 1.

In addition to the extra labor hours required by the RTR amendments, labor costs also increased due to increases in the hourly labor rates for technical and clerical staff.

The number of affected facilities changed from that used in the 2018 ICR renewal because of continued consolidation and closures within the cellulose products manufacturing industry and updates to the number of affected facilities based on information collected during the development of the RTR rulemaking.

6(g) Burden Statement

The annual average public reporting and recordkeeping burden for this collection of information is estimated to be 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.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

- Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)
- Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Revised)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	Labor Cost Per Hour
	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=E \times 0.05)	Clerical person hours per year (G=E \times 0.1)	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								
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
Semiannual report - deviations ^j	16	2	32	1.6	51	2.6	5.1	\$6,772

					\$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
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 (see Section 6(b)(iii))								\$120,135
GRAND TOTAL								\$954,624

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 it 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 x 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) (Revised)

					\$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)	Management 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	3	48	2.4	4.8	\$2,624
Semiannual report - other ^l	2	2	4	8	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.