

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal), EPA ICR Number 1811.11, OMB Control Number 2060-0415.

1(b) Short Characterization/Abstract

The NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) were proposed on September 4, 1997; promulgated on June 1, 1999; and amended on March 27, 2014. These regulations apply to both new and existing facilities that engage in the manufacture of polyether polyols (including polyether mono-ols) and emit hazardous air pollutants (HAPs). Owners or operators of polyether polyols production facilities to which this regulation applies must either choose one of the compliance options described in the rule or install and monitor a specific control system that reduces HAP emissions to the compliance level. Respondents are also subject to sections of 40 CFR Part 63, Subpart A. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart PPP.

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 startup, shutdown, or malfunction in the operation of an affected facility, 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 the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional offices.

The “Affected Public” are owners or operators of polyether polyols production facilities. The “burden” to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal). There are approximately 23 facilities. None of the facilities in the United States are owned by 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 23 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, 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.

In the Administrator's judgment, HAP emissions from polyether polyols production 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 PPP.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform either the Agency or its delegated authority when a source becomes subject to the requirements of these 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 that these standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

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

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

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (84 FR 19777) on May 6, 2019. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 23 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Chemistry Council, at (202) 249-7000, and the Society of Chemical Manufacturers and Affiliates, at (571) 348-5100.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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

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

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are polyether polyols production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2869, which corresponds to the North American Industry Classification System (NAICS) 325199 for All Other Basic Organic Chemical Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP).

A source must make the following reports:

| Notifications | |
|---|---|
| Notification of applicability | §63.9(a) |
| Notification of construction/reconstruction | §§63.5(d)(1) (i and ii), 63.1439(b)(2) |
| Initial notifications, including startup | §63.1439(e)(3) |

| Notifications | |
|-----------------------------------|--------------------------------|
| Notification of compliance status | §§63.1430(g), 63.1439(e)(5) |
| Notification of performance test | §63.1437(a) |
| Notification of inspections | §63.1439(e)(7)(i) |

| Reports | |
|---|--|
| Periodic reports | §§63.1430(h), 63.1439(e)(6) |
| PRD requirements for period reports | §§63.1434(c)(3)(ii) 63.1434(f) |
| Reports of process changes | §§63.1420(g)(4), 63.1430(i), 63.1430(j), 63.1439(e)(7) (ii and iii) |
| Alternative request to use devices other than those specified in the process vent monitoring requirements | §63.1430(k) |
| Reports of malfunctions | §63.1439(b)(1)(ii) |
| Equipment leak reporting | §63.1439(c) |
| Precompliance report | §§63.1439(e)(4), 63.1439(e)(8), 63.1439(f and g) |
| Performance test results | §§63.7(g), 63.1439(e) (9) |

A source must keep the following records:

| Recordkeeping | |
|---|------------------------------|
| Records of applicability | §§63.10(b)(3), 63.1420(e) |
| Records to demonstrate process vent control compliance | §63.1430(b) |
| Records related to establishment of parameter monitoring levels | §63.1430(c) |
| Records to demonstrate continuous compliance | §63.1430(d) |
| Records related to group determination for process vents associated | §63.1430(e) |

| Recordkeeping | |
|--|----------------|
| with use of non-epoxide organic HAP to make or modify the product | |
| Records for Group 2 process vents associated with use of non-epoxide organic HAP to make or modify the product | §63.1430(f) |
| Records retention for five years | §63.1439(a) |
| Records of malfunctions | §63.1439(b)(1) |
| Equipment leak records | §63.1439(c) |
| Continuous monitoring records, including records of PRD releases to atmosphere | §63.1439(d) |

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site. Pursuant to 40 CFR 63.1439(e)(9)(i), respondents must also submit performance test results electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The CDX is the EPA's portal for submittal of electronic data using the EPA-provided ERT to generate electronic reports of performance tests and evaluations.

(ii) Respondent Activities

| Respondent Activities |
|--|
| Familiarization with the regulatory requirements. |
| Install, calibrate, maintain, and operate CMS for temperature, pH, pressure drop or liquid supply pressure for the appropriate control device. |
| Perform initial performance test 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 collecting, validating, and verifying information. |

| Respondent Activities |
|---|
| Develop, acquire, install, and utilize technology and systems for processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for 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 |
|---|
| Review notifications and reports, including performance test reports, and excess emissions 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 these emission standards, and to 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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial

and government-owned facilities. EPA uses ICIS 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.

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

5(c) Small Entity Flexibility

The 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 these regulations. 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

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. Wherever 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 three years from these recordkeeping and reporting requirements is estimated to be 3,710 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, 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 | \$141.06 (\$67.17+ 110%) |
| Technical | \$120.27 (\$57.27 + 110%) |
| Clerical | \$58.67 (\$27.94 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

| Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | | | |
|--|--|----------------------------------|--|--|---------------------------------------|---------------------------|
| (A) Continuous Monitoring Device | (B) Capital/Startup Cost for One Respondent | (C) Number of New Respondents | (D) Total Capital/Startup Cost, (B X C) | (E) Annual O&M Costs for One Respondent | (F) Number of Respondents with O&M | (G) Total O&M, (E X F) |
| Process vent monitoring equipment ^{1, 2} | \$9,385 | 0 | \$0 | \$0 | 23 | \$0 |
| PRD electronic indicators ^{1, 3} | \$69,233 | 0 | \$0 | \$0 | 23 | \$0 |
| Total | | | \$0 | | | \$0 |

¹ Annual O&M costs are estimated to be negligible and are therefore assumed to be zero.

² We assume existing facilities have already paid off the process vent monitoring equipment.

³ Existing sources were required to install PRD monitoring equipment within three years of the final amendment date (March 27, 2014). We assume that all existing facilities have already installed PRD monitoring equipment. Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$0. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$0.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities 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 \$5,320.

This cost is based on the average hourly labor rate as follows:

| | |
|------------|--|
| Managerial | \$66.62 (GS-13, Step 5, \$41.64 + 60%) |
| Technical | \$49.44 (GS-12, Step 1, \$30.90 + 60%) |
| Clerical | \$26.75 (GS-6, Step 3, \$16.72 + 60%) |

These rates are from the Office of Personnel Management (OPM), 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 Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

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, approximately 23 existing respondents will be subject to these standards. It is estimated that an additional 0 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 23 per year.

The number of respondents is calculated using the following table that addresses the three 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 | 23 | 0 | 0 | 23 |
| 2 | 0 | 23 | 0 | 0 | 23 |
| 3 | 0 | 23 | 0 | 0 | 23 |
| Average | 0 | 23 | 0 | 0 | 23 |

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 three-year period of this ICR is 23.

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 applicability | 0 | 0 | 0 | 0 |
| Notification of construction/reconstruction | 0 | 0 | 0 | 0 |
| Notification of actual startup | 0 | 0 | 0 | 0 |
| Initial notification | 0 | 0 | 0 | 0 |
| Performance test notification | 0 | 0 | 0 | 0 |
| Compliance status notification | 0 | 0 | 0 | 0 |

| Total Annual Responses | | | | |
|---|----|---|-------|----|
| Performance test reports | 0 | 0 | 0 | 0 |
| Malfunction reports | 0 | 0 | 0 | 0 |
| Semiannual summary report | 23 | 2 | 0 | 46 |
| Notification of physical/ operational change | 2 | 1 | 0 | 2 |
| PRD reporting ¹ | 23 | 0 | 0 | 0 |
| | | | Total | 48 |

¹ Annual occurrences of PRD reporting are not counted as separate responses because they are required to be submitted with the semiannual reports.

The number of Total Annual Responses is 48.

The total annual labor costs are \$429,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP).

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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 3,710. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP).

We assume that burdens for managerial tasks take 5% 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% 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 77 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 110 labor hours at a cost of \$5,320; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. There is an adjustment increase in the labor costs in this ICR compared to the previous ICR due to the increase in labor costs over the past three years.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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-OECA-2014-0063. 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, 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-OECA-2014-0063 and OMB Control Number 2060-0415 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: Annual Respondent Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

| Burden item | A | B | C | D | E | F | G | H |
|---|-----------------------------|-----------------------------------|--|-----------------------------------|---------------------------------|------------------------------------|----------------------------------|--------------------------|
| | Person-hours per occurrence | Annual occurrences per respondent | Person-hours per respondent per year (AxB) | Respondents per year ^a | Technical hours per year (Cx D) | Management hours per year (Ex0.05) | Clerical hours per year (Ex0.10) | Annual cost ^b |
| 1. Applications | N/A | | | | | | | |
| 2. Surveys and studies | N/A | | | | | | | |
| 3. Reporting requirements | | | | | | | | |
| A. Familiarization with Regulatory Requirements | 1 | 1 | 1 | 23 | 23 | 1.2 | 2.3 | \$3,063.37 |
| B. Required activities | | | | | | | | |
| i. Initial performance test: process vents | N/A | | | | | | | |
| ii. Initial performance test: wastewater | N/A | | | | | | | |
| C. Write reports | | | | | | | | |
| i. Notification of applicability | N/A | | | | | | | |
| ii. Notification of construction/reconstruction | N/A | | | | | | | |
| iii. Notification of actual startup | N/A | | | | | | | |
| iv. Initial notification | N/A | | | | | | | |
| v. Performance test notification | N/A | | | | | | | |
| vi. Compliance status notification | N/A | | | | | | | |
| vii. Performance test report | N/A | | | | | | | |

| | | | | | | | | |
|---|--------|---|----|----|-------|--------------|-------|------------------|
| viii. Malfunction report | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| ix. Semiannual summary report | 20 | 2 | 40 | 23 | 920 | 46 | 92 | \$122,534.80 |
| x. Notification of physical/operational change ^c | 2 | 1 | 2 | 2 | 4 | 0.2 | 0.4 | \$532.76 |
| xi. PRD reporting in semiannual report | 5.5 | 2 | 11 | 23 | 253 | 12.65 | 25.3 | \$33,697.07 |
| Subtotal for Reporting Requirements | | | | | | 1,380 | | \$159,828 |
| 4. Recordkeeping requirements | | | | | | | | |
| A. Familiarization with Regulatory Requirements | N/A | | | | | | | |
| B. Develop record system | N/A | | | | | | | |
| C. Time to train personnel | N/A | | | | | | | |
| D. Continuously monitor parameters | See 3C | | | | | | | |
| E. LDAR program | 88 | 1 | 88 | 23 | 2,024 | 101.2 | 202.4 | \$269,576.56 |
| F. Startup, shutdown, malfunction plan | N/A | | | | | | | |
| Subtotal for Recordkeeping Requirements | | | | | | 2,327 | | \$269,577 |
| TOTAL ANNUAL BURDEN AND COST (Rounded) | | | | | | 3,710 | | \$429,000 |
| Capital and O&M Costs (See Section 6(b)(iii)) | | | | | | | | \$0 |
| TOTAL COST | | | | | | 3,710 | | \$429,000 |

Assumptions:

^a EPA estimates an average of 23 existing sources will be subject to the NESHAP over the next 3 years. No new sources are expected to become subject over the three-year ICR period.

^b This ICR uses the following labor rates: \$120.27 (technical), \$141.06 (managerial), and \$58.67 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c EPA assumes 10% of existing sources will submit notifications of physical/operational change (23 x 10% = 2.3, or 2 after rounding).

^dTotals are rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyether Polyols Production (40 CFR Part 63, Subpart PPP) (Renewal)

| Burden item | A | B | C | D | E | F | G | H |
|--|---------------------------------|-----------------------------------|--|-----------------------------------|---------------------------------|------------------------------------|----------------------------------|--------------------------|
| | EPA person-hours per occurrence | Annual occurrences per respondent | EPA person-hours per respondent per year (AxB) | Respondents per year ^a | Technical hours per year (Cx D) | Management hours per year (Ex0.05) | Clerical hours per year (Ex0.10) | Annual cost ^b |
| Review notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Review notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Review initial notification report | 8 | 1 | 8 | 0 | 0 | 0 | 0 | \$0 |
| Review notification of performance test | 4 | 1 | 4 | 0 | 0 | 0 | 0 | \$0 |
| Review notification of compliance status | 10 | 1 | 10 | 0 | 0 | 0 | 0 | \$0 |
| Review performance test results | 10 | 1 | 10 | 0 | 0 | 0 | 0 | \$0 |
| Malfunction report | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Review semiannual summary reports | 2 | 2 | 4 | 23 | 92 | 4.6 | 9.2 | \$5,101.03 |
| Review notification of physical/operational change | 2 | 1 | 2 | 2 | 4 | 0.2 | 0.4 | \$221.78 |
| TOTAL ANNUAL BURDEN AND COST (ROUNDED) | | | | | 110 | | | \$5,320 |

Assumptions:

^a EPA estimates an average of 23 existing sources will be subject to the NESHAP over the next 3 years. No new sources are expected to become subject over the three-year ICR period.

^b This ICR uses the following labor rates: \$49.44 (technical), \$66.62 (managerial), and \$26.75 (clerical). These rates are from the Office of Personnel Management (OPM), 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.

^c Totals are rounded to three significant figures. Figures may not add exactly due to rounding.