

Table 1 - Annual Respondent Burden and Cost – NESHAP for Manufacturing of Nutritional Yeast (40 CFR Part

Burden Item	63, CCCC) (Renewal)							
	(A) Respondent Hours per Occurrence (Technical hours)	(C) Number of Occurrences Per Respondent Per Year	(D) Technical Hours per Respondent Per Year (A X C)	(E) Number of Respondents Per Year	(F) Technical Hours per Year (D X E)	(G) Clerical Hours per Year (F X 0.1)	(H) Management Hours per Year (F X .05)	(I) Total Labor Costs Per Year ^b
1. Applications	NA							
2. Surveys and Studies	NA							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements ^a	15	1	15	4	60	6	3	\$8,094
B. Required Activities								
1. VOC CEMS ^c								
a. Capital Cost	0	1	0	0	0	0	0	\$0
b. Annualized Cost ^d	0	1	0	4	0	0	0	\$0
2. Performance evaluation ^e	8	1	8	1.33	10.64	1	1	\$1,435
a. CEMS RATA ^f	0	6.5	0	1.33	0	0	0	\$0
3. Brew Ethanol Correlation	10	3	30	0	0	0	0	\$0
C. Create Information	Inc. in 3B							
D. Gather Information	Inc. in 3E							
E. Report Preparation								
1. Develop Performance Evaluation Plan	15	1	15	0	0	0	0	\$0
2. Notification of Performance Evaluation	2	1	2	1.33	2.66	0	0	\$359
3. Performance Evaluation Report	2	1	2	1.33	2.66	0	0	\$359
4. Notification of Performance Test	2	1	2	0	0	0	0	\$0
5. Notification of Compliance Status	4	1	4	0	0	0	0	\$0
6. Semiannual Compliance Report	4	2	8	4	32	3	2	\$4,317
Subtotal for Reporting Requirements						124		\$14,564
4. Recordkeeping Requirements								
A. Read Instructions	Inc. in 3.A							
B. Implement Activities	NA							
C. Develop Record System	NA							
1. Compliance Calculation Tracking	20	1	20	0	0	0	0	\$0
D. Record information								
1. Performance Evaluations	2	1	2	1.33	2.66	0	0	\$359
2. CEMS Measurements	0.5	350	175	4	700	70	35	\$94,434
3. Compliance Calculation	4	12	48	4	192	19	10	\$25,902
4. CEMS Calibration and Maintenance	Inc. in 3.B.1.b							
5. Store, File, and Maintain Records	12	1	12	4	48	5	2	\$6,475
6. Retrieve Records/Reports	20	1	20	4	80	8	4	\$10,792
E. Personnel Training								
1. Acquisition, Installation, & Training	20	1	20	4	80	8	4	\$10,792
2. CEMS Inspection and Monitoring	4	1	4	4	16	2	1	\$2,158
F. Time for Audits	NA							
Subtotal for Recordkeeping Requirements						1286		\$150,913
TOTAL LABOR BURDEN AND COSTS (rounded)^g						1410		\$165,000
TOTAL CAPITAL AND O&M COST (rounded)^g								\$776,000
GRAND TOTAL (rounded)^g								\$941,000

Assumptions:

^a We have assumed that all of the respondents will familiarize with the regulatory requirements each year.

^b This ICR uses the following labor rates: \$148.45 per hour for Executive, Administrative, and Managerial labor; \$121.46 per hour for Technical labor, and \$60.23 per hour for Cleric

^c All facilities must use VOC CEMS.

^d Annualized cost equals the average of all facility annualized costs (based on number of fermenters). Includes operation, maintenance, and repairs of CEMS.

^e Labor hours to conduct performance evaluation of CEMS. Assumes 4 respondents will complete over 12 quarters or 3 years for average of 1.33/year.

^f Line item for annual non-labor cost to conduct RATA. Number of occurrences per respondent equals the average number of CEMS (i.e., fermenters) per facility. Assumes 4 sources will complete over 12 quarters or 3 years for average of 1.33/year.

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

Table 2 - Average Annual EPA Burden and Cost – NESHAP for Manufacturing of Nutritional Yeast (40 CFR Part 63, CCCC) (Renewal)

Burden Item	(A) Number of Occurrences Per Year ^a	(B) Technical Hours Per Occurrence	(C) Tech Hours Per Year (C=A x B)	(D) Management Hours Per Year (D = C x 0.05)	(E) Clerical Hours Per Year (E = C x 0.1)	(F) Total Hours Per Year (C+D+E)	(G) Total Cost Per Year ^c
1. Applications	not applicable						
2. Familiarization with the regulatory requirements	0	20	0	0	0	0	\$0
3. Required Activities	not applicable						
A. Observe stack tests	0	16	0	0	0	0	\$0
B. Excess emissions -- Enforcement Activities ^b	0	24	0	0	0	0	\$0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews	not applicable						
1. Review performance evaluation plans	0	10	0	0	0	0	\$0
2. Review performance evaluation reports	1.33	5	7	0	1	8	\$378
3. Review performance test reports	0	5	0	0	0	0	\$0
4. Review compliance reports	4	5	20	1	2	23	\$1,138
F. Prepare annual summary report	1	10	10	1	1	12	\$569
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =				\$0	per trip		\$0
TOTAL (rounded) ^d				42			\$2,080

Assumptions:

^a Number of occurrences is the number of states where affected sources will exist and each EPA Region (3 states + 3 EPA regions = 6 respondents).

^b Assume 1 of the facilities will exceed emissions in year 2.

^c This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$68.37

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
VOC CEMs ^a	\$86,770	0	\$0	\$186,860	4
CEMS RATA ^b	\$0	0	\$0	\$21,216	1.33
Brew Ethanol Correlation ^c	\$0	0	\$0	\$19,500	0
Total			\$0		

a Assumes all facilities have installed CEMS to comply with the rule. Annual costs include operation, maintenance, and CEMS.

b Assumes an annual O&M cost of \$3,624 to conduct RATA per CEMS and an average of 6.5 CEMs per facility. 6.5 CEMs per facility over 12 quarters or 3 years for average of 1.33 respondents/year.

c Assumes no facilities will conduct brew ethanol correlation.

(G)
Total O&M, (E X F)
\$747,440
\$28,217
\$0
\$776,000

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