

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal), EPA ICR Number 2256.06, OMB Control Number 2060-0598.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) were proposed on April 4, 2007; promulgated on June 16, 2007; and amended on March 26, 2008. These regulations apply to existing facilities and new facilities at area sources in the six industry sectors described below. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

The first type of potential respondents are either owners or operators of any existing or new acrylic or modacrylic fibers production plant that is an area source of hazardous air pollutants (HAP) emissions. There are two existing area sources already subject to emissions limits and other requirements that are the same as those in this final NESHAP. These include: numerical limits for acrylonitrile emissions from the control devices (packed column scrubbers) for polymerization process equipment (e.g., reactors, feed tanks) and monomer recovery process equipment such as polymer holding tanks; operating limits for the scrubbers; and requirements in 40 CFR Part 60, Subpart Kb pertaining to volatile organic liquids in acrylonitrile storage tanks. The final standards for new area source acrylic or modacrylic fibers production plants apply to process vents, fiber spinning lines, storage tanks, process and maintenance wastewater, and equipment leaks. These include numerical limits for acrylonitrile emissions from these sources and various testing, monitoring, and recordkeeping requirements. Compliance requirements for all sources include an initial notification of applicability, a notification of compliance status, and a startup shutdown malfunction (SSM) plan.

The second type of potential respondents covers owners or operators of any existing or new carbon black production plant that is an area source of HAP emissions. There is one existing area source. The final rule for existing sources includes requirements to reduce emissions from carbon black production units by using either a flare or by venting through a closed vent system to a control device that reduces emissions by 98 weight-percent or to a HAP concentration of 20 parts per million by volume (ppmv). Area sources are also required to monitor operating parameters specific to the type of control device being used. The requirements for new area source carbon black production plants are the same as those for existing plants. Compliance requirements include an initial notification, a notification of compliance status, periodic reports, and a SSM plan.

The third type of potential respondents involves owners or operators of area source facilities that use chromite ore as the basic feedstock to manufacture chromium compounds, primarily sodium dichromate, chromic acid, and chromic oxide. There are only two plants in this area source category, and both are already subject to particulate matter (PM) control requirements that are the same as those in the final NESHAP. Sources will be subject to PM emissions limits and inspection and maintenance requirements specific to the type of control device. Compliance requirements include an initial notification of applicability, a notification of compliance status, and a SSM plan.

The fourth type of potential respondents covers owners or operators of area source facilities that manufacture or fabricate flexible polyurethane foam. There are 500 plants in this area source category, but almost all of them have already discontinued use of the urban HAP of interest, methylene chloride. Use of materials containing methylene chloride is forbidden for mixhead flush, mold release agents, and equipment cleaning at slabstock, molded, and rebond foam production facilities. Foam fabrication facilities are forbidden to use adhesives containing methylene chloride. Compliance requirements for molded and rebond foam facilities, and foam fabrication facilities not operating loop slitters include only recordkeeping requirements. Compliance requirements for foam fabrication facilities operating loop slitters include a notification of compliance status. Emissions limits are established for HAP emissions from auxiliary blowing agents (ABA) used in production lines at slabstock foam production facilities, using a formula which takes into account the variable amount of ABA used to produce different grades of foam. Compliance requirements for slabstock foam facilities using no methylene chloride include a notification of compliance status. Compliance requirements for slabstock foam production facilities using HAP-containing ABA include an initial notification, a pre-compliance report, a notification of compliance status, semiannual reports, and an annual compliance certification. There are an estimated 500 respondents in this area source category.

The fifth type of potential respondents involves owners or operators of any existing or new lead acid battery manufacturing facility that is an area source of HAP emissions. The 41 existing facilities are already subject to or able to meet the emission limits and other requirements of the new source performance standards (NSPS) for lead acid batteries in 40 CFR 60.372 of Subpart KK. The lead acid battery NSPS emission limits are the same as those in this

NESHAP. These include numerical emissions limits for grid casting, paste mixing, three-process operation, lead oxide manufacturing, lead reclamation, and other lead emitting processes. This final NESHAP requires control by fabric filters for the paste mixing, three-process operation, lead oxide manufacturing, and other lead-emitting processes and by impingement scrubber for the grid casting and lead reclamation processes. The NESHAP adds the periodic monitoring and semi-annual inspection of fabric filters and the semi-annual reporting requirements found in state permits. The requirements for new area source lead acid battery manufacturing facilities are the same as those for the existing facilities. Compliance requirements include an initial notification, a notification of compliance status, performance testing if recent test reports are not available, periodic monitoring, semi-annual inspection of fabric filters, and semi-annual reporting.

The sixth type of potential respondents involves owners or operators of area source facilities that use either pressure or thermal processes to impregnate chemicals into wood to a depth that will provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. Existing facilities in the wood preserving source category are currently well controlled in terms of urban metal HAP emissions as a result of a voluntary decision by the industry to discontinue the consumer uses of chromated copper arsenate (CCA). All sources will be required to submit an initial notification, a notification of compliance status, and a compliance report within 30 days of a deviation from any of these prohibitions. No other recordkeeping or reporting requirements in the General Provisions apply to facilities in this area source category. Currently, there are 393 respondents in this area source category.

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

In total, there are approximately 939 acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities, which are both owned and operated by the private industries (the “Affected Public”). None of the 939 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assumed that they will all respond. The “burden” to the “Affected Public” may be found below in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources:

Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal). The “burden” to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

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

Over the next three years, approximately 939 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these 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 acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving 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, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the 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 the emission standards. Continuous emission monitors are used to ensure compliance with the 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 the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standards are being met. 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. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ.

### **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

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

### **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* (85 FR 28033) on May 12, 2020. We received written comments from Jeffrey Miller, President and Executive Director of the Treated Wood Council regarding the inventory of wood preserving facilities subject to 40 CFR 63, Subpart QQQQQQ. The written comments indicated that there are approximately 140 to 150 wood preserving facilities in the United States, and that the prior estimate of approximately 400 facilities was likely related to the pre-2004 use of chromated copper arsenate (CCA) for the treatment of dimensional lumber. We considered the input provided by the commenter, however, based on information EPA has collected for recent development of a proposed rulemaking, we have identified approximately 470 facilities potentially subject to QQQQQQ. Therefore, for a conservative estimate of burden, we are retaining the prior estimate of 393 facilities for this renewal. This estimate may be updated in the next ICR 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 the standard, 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 939 respondents will be subject to the standard over the three-year period covered by this ICR. The number of respondents has been adjusted to reflect revisions to the number of acrylic or modacrylic fibers production plants and carbon black production plants based on additional facilities identified through the EPA's Enforcement and Compliance History Online (ECHO) database, as well as a decrease in the number of lead acid battery manufacturing facilities subject to 40 CFR Part 63, subpart PPPPPP, based on data gathered as part of recent rulemaking efforts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the following trade associations and companies: Aramid High Performance Materials at (843) 686-2132, Birla Carbon at (770) 792-9400, Elementis at (609) 443-2500, the Polyurethane Foam Association at (865) 657-9840, FXI at (484) 585-5000, Axion Power International, Inc. at (724) 654-9300, and Treated Wood Council, Inc. at (202) 641-5427.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. The comments received and our responses may be found in Section 3(b) above and in the docket for this ICR at <http://www.regulations.gov>.

### **3(d) Effects of Less Frequent 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 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 the 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 (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 the standard 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 acrylic and modacrylic fibers production, carbon black production, chemical manufacturing: chromium compounds, flexible polyurethane foam production and fabrication, lead acid battery manufacturing, and wood preserving facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

<b>Standard (40 CFR Part 63, Subparts, LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Artificial and Synthetic Fibers and Filaments Manufacturing	2824	325220
Other Basic Inorganic Chemical Manufacturing	2816, 2895	325180
	2819, 2869	325180
Urethane and Other Foam Product (except Polystyrene) Manufacturing	3086	326150
Storage Battery Manufacturing	3691	335911
Wood Preservation	2491	321114

**4(b) Information Requested**

**(i) Data Items**

In this ICR, all the data that is either recorded or reported is required by the NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ).

A source must make the following reports:

<b>Notifications</b>	
Notification of applicability	§63.9(a)(2)
Notification of construction/reconstruction	§63.9(b)(5)
Notification of special compliance requirements	§63.9(d)

<b>Notifications</b>	
Notification of performance test	§63.9(e)
Notification of opacity/VE observations	§63.9(f)
Additional CMS notification	§63.9(g)
Notification of compliance status	§§63.11397(b), 63.11397(c), 63.9(h)
Notification of change in information	§63.9(j)

<b>Reports</b>	
Monthly summary of monitoring data	§§63.11395(f), 63.11396(f)
Report of deviation	§63.11225(b)(3)
Quality assurance test plan	§63.7(c)
CMS performance evaluations/report	§63.8(e)(5)
SSM reports	§63.6(e)(3)
Excess emissions report	§63.10(e)(3)

A source must keep the following records:

<b>Recordkeeping</b>	
Information to demonstrate compliance	§§63.11395(g), 63.11396(f), 63.10(a)
Startup, shutdown, and malfunction	§63.10(b)(2)
Continuous parameter monitoring systems	§§61.10(c)(1), (c)(5)-(14)
Records should be retained for 5 years	§63.11395(g), 63.10(b)(1)

### **Carbon Black Production**

<b>Notifications</b>	
Initial notification	§63.1110(c)(2)
Notification of construction/reconstruction	§§63.5(d), 63.1110(a)(6)
Notification of initial startup	§63.1110(b)
Notification of performance test	§§63.1110(a)(i), 63.999(a)
SSM plan	§63.1111(a)
Notification of compliance status	§63.1110(d)

<b>Reports</b>	
Initial/repeat performance tests	§63.999(a)
SSM reports	§63.6(e)(3)

<b>Recordkeeping</b>	
Monitoring information	§63.998, 63.11
All other control devices	§63.996
Records should be retained for 5 years	§§63.11395(g), 63.10(b)(1)

### **Chemical Manufacturing: Chromium Compounds**

<b>Notifications</b>	
Notification of applicability	§63.9(a)(2)
Notification of construction/reconstruction	§63.9(b)(5)
Notification of performance test	§§63.11410(i), 63.9(e)
Notification of compliance status	§63.9(h)

<b>Reports</b>	
Semiannual monitoring report	§63.999(b)(2)
Quality assurance test plan	§63.7(c)
CMS performance evaluation/report	§63.8(e)(5)
SSM reports	§63.6(e)(3)
Excess emissions reports	§63.10(e)(3)

<b>Recordkeeping</b>	
Monthly control device inspections	§63.11410(h), 63.10(b)

### **Flexible Polyurethane Foam Production and Fabrication**

<b>Notifications</b>	
Notification of applicability	§63.9(a)(1)
Notification of compliance status	§63.9(h)

<b>Reports</b>	
Initial/repeat performance test	§§63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	§63.7(c)
SSM reports	§63.6(e)(3)
CMS performance evaluation/report	§63.8(e)(5)
Excess emissions reports	§63.10(e)(3)

<b>Recordkeeping</b>	
Information used to demonstrate compliance	§§63.11416(f), 63.10

### **Lead Acid Battery Manufacturing**

<b>Notifications</b>	
Notification of applicability	§63.9(a)(1)
Notification of construction/reconstruction	§63.9(b)(5)
Notification of special compliance requirements	§63.9(d)
Notification of performance test	§63.9(e)
Notification of opacity/VE observations	§63.9(f)
Additional CMS notifications	§63.9(g)
Notification of compliance status	§§63.11417(b)(2), 63.9(h)
Notification of changes of information	§63.9(j)

<b>Reports</b>	
Initial/repeat performance test	§§63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	§63.7(c)
CMS performance evaluation/report	§63.8(e)(5)
Excess emissions reports	§63.10(e)(3)

<b>Recordkeeping</b>	
Information used to demonstrate compliance	§§63.11423(b), 63.10

## **Wood Preserving**

<b>Notifications</b>	
Notification of applicability	§63.9(a)(1)
Notification of construction/reconstruction	§63.9(b)(5)
Notification of special compliance requirements	§63.9(d)
Notification of performance test	§63.9(e)
Notification of opacity/VE observations	§63.9(f)
Additional CMS notifications	§63.9(g)
Notification of compliance status	§63.9(h)
Notification of changes of information	§63.9(j)

<b>Reports</b>	
Reports of deviation	§63.11432(d)
Initial/repeat performance test	§§63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	§63.7(c)
CMS performance evaluation/report	§63.8(e)(5)
SSM reports	§63.6(e)(3)
Excess emissions reports	§63.10(e)(3)

<b>Recordkeeping</b>	
Information used to demonstrate compliance	§63.10

### **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.

#### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control devices, bag leak detection system, and air scavenging systems for control device.

<b>Respondent Activities</b>
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 3, 3A, 3B, 5, 5D 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.
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.

<b>Agency Activities</b>
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 the

emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is 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. 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**

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. 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 Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a through 1f document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the subparts included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where

appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may 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 these recordkeeping and reporting requirements is estimated to be 5,730 (Total Labor Hours from Tables 1a through 1f). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$148.45 (\$70.69 + 110%)
Technical	\$121.46 (\$57.84 + 110%)
Clerical	\$60.23 (\$28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, “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.

<b>Standard</b>	<b>Reporting Burden Hours</b>	<b>Recordkeeping Burden Hours</b>	<b>Total Respondent Burden Hours</b>	<b>Respondent Burden Costs</b>
Subpart LLLLLL	18	0	18	\$2,158
Subpart MMMMMM	9	0	9	\$1,079
Subpart NNNNNN	183	0	183	\$21,480
Subpart OOOOOO	2,310	110	2,420	\$283,000
Subpart PPPPPP	1,290	0	1,290	\$151,000
Subpart QQQQQQ	1,810	0	1,810	\$212,000
<b>Total (rounded)</b>			<b>5,730</b>	<b>\$671,000</b>

## (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

## (iii) Capital/Startup vs. Operation and Maintenance (O&M) 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)
Fabric Filter for Lead Acid Battery	\$4,840	0	\$0	\$0	0	\$0
Total			\$0			\$0

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. These are recordkeeping costs.

## 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 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 \$1,370.

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

Managerial	\$68.37 (GS-13, Step 5, \$42.73 + 60%)
Technical	\$50.72 (GS-12, Step 1, \$31.70 + 60%)
Clerical	\$27.46 (GS-6, Step 3, \$17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 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 at the end of this document in Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

<b>Standard</b>	<b>Agency Burden Hours</b>	<b>Agency Burden Costs</b>
Subpart LLLLLL	0	\$0
Subpart MMMMMM	0	\$0
Subpart NNNNNN	5	\$228
Subpart OOOOOO	5	\$228
Subpart PPPPPP	18	\$910
Subpart QQQQQQ	0	\$0
<b>Total (rounded)</b>	28	\$1,370

#### **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 939 existing respondents will be subject to the standard. The existing respondents include: 2 acrylic and modacrylic fiber production facilities, 1 carbon black production facility, 2 chromium compound manufacturing facilities, 500 flexible polyurethane foam production and fabrication facilities, 41 lead acid battery manufacturing facilities, and 393 wood preserving facilities. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 939 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	939	0	0	684
2	0	939	0	0	684
3	0	939	0	0	684
Average	0	939	0	0	684

<sup>1</sup> 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 939.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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
<b>Subpart LLLLLL – Acrylic and Modacrylic Fiber Production Sources</b>				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0
Startup, Shutdown, Malfunction Plan	0	1	2	2
<b>Subpart MMMMMM – Carbon Black Production Sources</b>				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0
Startup, Shutdown, Malfunction Plan	0	1	1	1
<b>Subpart NNNNNN – Chemical Manufacturing: Chromium Compound Sources</b>				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0

<b>Total Annual Responses</b>				
(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
Startup, Shutdown, Malfunction Plan	0	1	0	0
Semiannual report	1	2	0	2
<b>Subpart OOOOOO – Flexible Polyurethane Foam Production and Fabrication Sources</b>				
Notification of compliance status (facilities not using methylene chloride)	0	1	0	0
Notification of compliance status (facilities using methylene chloride)	0	1	0	0
Pre-compliance report	0	1	0	0
Initial notification of applicability	0	1	0	0
Semiannual Reports	1	2	0	2
<b>Subpart PPPPPP – Lead Acid Battery Manufacturing Sources</b>				
Initial notification of applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Initial/repeat performance test	0	1	0	0
Semiannual report	4	2	0	8
<b>Subpart QQQQQQ – Wood Preserving Sources</b>				
Initial Notification of Applicability	0	1	0	0
Notification of Compliance Status	0	1	0	0
			Total	15

The number of Total Annual Responses is 15.

The total annual labor costs are \$671,000. Details regarding these estimates may be found at the end of this document in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (Renewal).

## **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 1a through 1f and Tables 2a through 2f at the end of this document, respectively, and summarized below.

### **(i) Respondent Tally**

The total annual labor hours are 5,730. Details regarding these estimates may be found in Tables 1a through 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (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.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 382 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 38 labor hours at a cost of \$1,370. See below in Tables 2a through 2f: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production, Carbon Black Production, Chemical Manufacturing: Chromium Compounds, Flexible Polyurethane Foam Production and Fabrication, Lead Acid Battery Manufacturing, and Wood Preserving (40 CFR Part 63, Subparts LLLLLL, MMMMMM, NNNNNN, OOOOOO, PPPPPP, and QQQQQQ) (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 a decrease in burden from the most recently approved ICR. The decrease is not due to any program changes, but is due to an adjustment. The adjustment decrease in burden from the most recently approved ICR is due to a decrease in the number of sources as a result of data gathered as part of recent rulemaking efforts related to 40 CFR 63, Subpart P, NESHAP for Lead Acid Battery Manufacturing Area Sources. Additionally, we have adjusted the number of respondents for 40 CFR 63, Subpart L and 40 CFR 63, Subpart M to each reflect one additional source. This change is based on our review of facilities with EIS IDs reporting under Subparts L and M in the EPA's ECHO database. The overall result is a decrease in the number of respondents and the burden hours. The proposed changes also result in an adjustment to the number of responses. This ICR also adjusts the number of responses from respondents for 40 CFR 63, Subpart Q. The prior ICR included an error in the Total Annual Responses table. Specifically, the prior ICR assumed all respondents subject to Subpart Q would maintain records of a notification of compliance status; however, the notification of compliance status is a one-time notification for new sources and there are no new wood preserving sources anticipated in this ICR. Therefore, the number of responses has decreased to 15. This change also revises the annual hours per response; because there are a large number of facilities subject to the subparts but relatively few regulatory requirements for submittal of notifications or reports for existing sources, the hours per response is inflated. The major burden for these subparts is to read and familiarize with the rules. There are no changes to the capital or operation and maintenance costs.

## **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 382 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under

Docket ID Number EPA-HQ-OECA-2013-0346. 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), EPA 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) 566-1927. 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-2013-0346 and OMB Control Number 2060-0598 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 1a: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	8	1	8	2	16	0.8	1.6	\$2,158.49
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
<b>Subtotal for Reporting Requirements</b>					<b>18</b>			<b>\$2,158</b>
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data <sup>d</sup>	N/A							
E. Time to transmit or disclose	See 3B							

information								
F. Time to train personnel <sup>d</sup>	N/A							
G. Time for audits <sup>d</sup>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>e</sup></b>						<b>18</b>		<b>\$2,158</b>

**Assumptions:**

<sup>a</sup> There are two existing acrylic and modacrylic production facilities that are area sources. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup> 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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We assume the two existing respondents will review the regulations once per year.

<sup>d</sup> No hours or costs are associated with this item because the rule imposes no additional burden.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1b: Annual Respondent Burden and Cost – NESHAP for Area Sources: Carbon Black Production (40 CFR Part 63, Subpart M) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	8	1	8	1	8	0.4	0.8	\$1,079.24
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
<b>Subtotal for Reporting Requirements</b>						<b>9</b>		<b>\$1,079</b>
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							

D. Record data <sup>d</sup>	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel <sup>d</sup>	N/A							
G. Time for audits <sup>d</sup>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>e</sup></b>						<b>9</b>		<b>\$1,079</b>

**Assumptions:**

<sup>a</sup> There is one existing carbon black production facilities that is an area source. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup> 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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We assume the one existing respondent will review the regulations once per year.

<sup>d</sup> No hours or costs are associated with this item because the rule imposes no additional burden.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1c: Annual Respondent Burden and Cost – NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1 )	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	8	1	8	2	16	0.8	1.6	\$2,158.49
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Initial performance test <sup>e</sup>	40	1	40	0	0	0	0	\$0
Daily check of water flow <sup>d</sup>	0.25	365	91.25	1	91.25	4.56	9.13	\$12,310
Monthly inspections of control devices <sup>d</sup>	4	12	48	1	48	2.40	4.8	\$6,475
Notification of compliance status	8	1	8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
Semiannual report <sup>f</sup>	2	2	4	1	4	0.2	0.4	\$540
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
<b>Subtotal for Reporting Requirements</b>					<b>183</b>			<b>\$21,480</b>
4. Recordkeeping Requirements								

A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data <sup>c</sup>	N/A							
E. Time to transmit or disclose information	See 3B							
F. Time to train personnel <sup>c</sup>	N/A							
G. Time for audits <sup>c</sup>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>g</sup></b>						<b>183</b>		<b>\$21,480</b>

**Assumptions:**

<sup>a</sup>There are two existing chemical manufacturing: chromium compounds facilities that are area sources. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup>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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We assume the two existing respondents will review the regulations once per year.

<sup>d</sup> We have assumed that only one facility must implement control device inspection on a recurring basis, so the number of respondents per year is one.

<sup>e</sup> We assumed that one facility needed to complete performance test, and that initial performance test has already been completed during the previous ICR period.

<sup>f</sup> We have assumed that only one chromium plant will be required to complete semiannual reports.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1d: Annual Respondent Burden and Cost – NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	4	1	4	500	2,000	100	200	\$269,811
B. Required activities								
Initial notification of applicability <sup>c</sup>	4	1	4	0	0	0	0	\$0
Process parameter testing <sup>c</sup>	50	1	50	0	0	0	0	\$0
Monitoring equipment calibrations <sup>c</sup>	8	2	16	0	0	0	0	\$0
Storage tank measurement <sup>c</sup>	1	12	12	0	0	0	0	\$0
Pre-compliance report <sup>c</sup>	4	1	4	0	0	0	0	\$0
Notification of compliance status (facilities using methylene chloride) <sup>d</sup>	16	1	16	0	0	0	0	\$0
Notification of compliance status (facilities not using methylene chloride) <sup>d</sup>	1	1	1	0	0	0	0	\$0
Semiannual compliance status report <sup>d</sup>	4	2	8	1	8	0.4	1	\$9
Develop record system <sup>g</sup>	80	1	80	0	0	0	0	\$0
Time to train personnel <sup>g</sup>	80	1	80	0	0	0	0	\$0

C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
<b>Subtotal for Reporting Requirements</b>						<b>2,309</b>		<b>\$269,800</b>
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data <sup>e</sup>	8	12	96	1	96	4.8	9.60	\$12,950.93
E. Time to transmit or disclose information	See 3B							
G. Time for audits <sup>g</sup>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>110</b>		<b>\$13,000</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>						<b>2,420</b>		<b>\$283,000</b>

**Assumptions:**

<sup>a</sup> There are 500 existing flexible polyurethane foam production and fabrication facilities that are area sources. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup> 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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We assume that all existing respondents will review the regulations once per year.

<sup>d</sup> We have assumed that only one facility will be subject to this requirement. We assume this facility has already submitted initial notifications and reports.

<sup>e</sup> We have assumed that there are 49 plants projected to be subject to this notification, and that initial notifications have been submitted during the previous ICR period.

<sup>f</sup> We have assumed that it will take one respondent 80 hours to complete each of these tasks.

<sup>g</sup> We have assumed that no hours or costs are will be associated with this item because the rule imposes no additional burden.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1e: Annual Respondent Burden and Cost – NESHAP for Area Sources: Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart P) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Annualized initial labor costs <sup>c</sup>	55	1	55	0	0	0	0	\$0
4. Reporting Requirements								
A. Familiarize with regulatory requirements <sup>d</sup>	8	1	8	41	328	16	33	\$44,249
B. Required activities								
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Initial/repeat performance test <sup>e</sup>	40	1	40	0	0	0	0	\$0
Periodic monitoring – daily	0.5	365	182.5	4	730	37	73	\$98,481.02
Notification of compliance status	2	1	2	0	0	0	0	\$0
Semiannual inspection <sup>f</sup>	6	2	12	4	48	2	5	\$6,475.46
Semiannual report <sup>f</sup>	2	2	4	4	16	1	2	\$2,158.49
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
<b>Subtotal for Reporting Requirements</b>						<b>1,290</b>		<b>\$151,000</b>

4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements <sup>d</sup>	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>g</sup></b>						<b>1,290</b>		<b>\$151,000</b>

**Assumptions:**

<sup>a</sup> There are 41 existing Lead Acid Battery Manufacturing facilities that are area sources. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup> 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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We have assumed that the average number of respondents for annualized initial labor costs reflects 10 percent of facilities that do not already have monitoring in their State permits.

<sup>d</sup> We assume that all existing respondents will review the regulations once per year.

<sup>e</sup> We have assumed that most sources conducted NSPS performance test, and no new tests are expected for this ICR period.

<sup>f</sup> We have assumed that only 10 percent of lead acid battery plants will be required to complete semiannual reports.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subpart QQQQQ) (Renewal)**

Burden item	(A) Person hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technica l person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	4	1	4	393	1,572	78.6	157.2	\$212,071.45
B. Required activities								
Initial notification of applicability and compliance status	2	1	2	0	0	0	0	\$0
Check list of best management practices	1	1	1	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
<b>Subtotal for Reporting Requirements</b>					<b>1,808</b>			<b>\$212,100</b>
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 3A							
C. Implement activities	See 3A							
D. Record data <sup>d</sup>	N/A							

E. Time to transmit or disclose information	N/A							
F. Time to train personnel <sup>d</sup>	N/A							
G. Time for audits <sup>d</sup>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>e</sup></b>						<b>1,810</b>		<b>\$212,000</b>

**Assumptions:**

<sup>a</sup> There are 393 existing wood preserving facilities that are area sources. No new sources are projected during the 3-year term of this ICR.

<sup>b</sup> 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 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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.

<sup>c</sup> We assume that all existing respondents will review the regulations once per year.

<sup>d</sup> We have assumed that there are no hours or costs associated with this item because the rule imposes not additional burden for this item.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2a: Annual Respondent Burden and Cost – NESHAP for Area Sources: Acrylic and Modacrylic Fibers Production (40 CFR Part 63, Subpart LLLLLL) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technica l person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0	0	0	0	\$0
Initial notification of compliance status <sup>c</sup>	4	1	4	0	0	0	0	\$0
<b>TOTAL BURDEN AND COST<sup>d</sup></b>						0		\$0

**Assumptions:**

<sup>a</sup> There are two existing acrylic and modacrylic production facilities that are area sources. There will be no new additional sources during the next three years of this ICR. The initial rule requirements apply only to new respondents.

<sup>b</sup> 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 4 hours once per year to complete task.

<sup>d</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2b: Annual Respondent Burden and Cost – NESHAP for Area Sources: Carbon Black Production (40 CFR Part 63, Subpart M) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan	4	1	4	0	0	0	0	\$0
Initial notification of compliance status	4	1	4	0	0	0	0	\$0
<b>TOTAL BURDEN AND COST<sup>c</sup></b>						0		\$0

**Assumptions:**

a There is one existing carbon black production facility. No new sources are projected during the three-year term of this ICR.

b 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

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

**Table 2c: Annual Respondent Burden and Cost – NESHAP for Area Sources: Chemical Manufacturing: Chromium Compounds (40 CFR Part 63, Subpart NNNNNN) (Renewal)**

Activity	(A) EPA person hours per occurrence <sup>e</sup>	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	0
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0	0	0	0	0
Initial notification of compliance status <sup>c</sup>	4	1	4	0	0	0	0	0
Semiannual reports <sup>d</sup>	2	2	4	1	4	0.2	0.4	\$228
<b>TOTAL BURDEN AND COST<sup>e</sup></b>						5		\$228

**Assumptions:**

<sup>a</sup> There are two existing chemical manufacturing: chromium compounds facilities that are area sources. There will be no new additional sources during the next three years of this ICR. The initial rule requirements apply only to new respondents.

<sup>b</sup> 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 4 hours once per year to complete task.

<sup>d</sup> We have assumed that only one facility must implement control device inspection on a recurring basis, so the number of respondents per year is one.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2d: Annual Respondent Burden and Cost – NESHAP for Area Sources: Flexible Polyurethane Foam Production and Fabrication (40 CFR Part 63, Subpart OOOOOO) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Pre-compliance report	2	1	2	0	0	0	0	\$0
Notification of compliance status	4	1	4	0	0	0	0	\$0
Semiannual compliance status report <sup>c</sup>	2	2	4	1	4	0.20	0.40	\$228
Notification of special compliance	2	1	2	0	0	0	0	\$0
Change in selected emission limit and compliance method	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustments to time periods, and changes in information	2	1	2	0	0	0	0	\$0
Progress reports for extensions	2	1	2	0	0	0	0	\$0
<b>TOTAL BURDEN AND COST<sup>e</sup></b>						5		\$228

**Assumptions:**

<sup>a</sup> There are 500 existing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. The initial rule requirements apply only to new respondents.

<sup>b</sup> 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that only one plant would be subject to these items.

<sup>d</sup> We have assumed that there are 49 plants subject to this notification, and that initial notifications have been submitted during a previous ICR period.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2e: Annual Respondent Burden and Cost – NESHAP for Area Sources: Lead Acid Battery Manufacturing (40 CFR Part 63, Subpart P) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Semiannual report <sup>c</sup>	2	2	4	4	16	0.8	1.6	\$910
Initial notification of compliance status <sup>d</sup>	4	1	4	0	0	0	0	\$0
<b>TOTAL BURDEN AND COST<sup>e</sup></b>						18		\$910

**Assumptions:**

<sup>a</sup> There are 41 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. The initial rule requirements apply only to new respondents.

<sup>b</sup> 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that 10 percent of respondents will review semiannual reports.

<sup>d</sup> We have assumed that each respondent will take 4 hours once per year to complete task.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2f: Annual Respondent Burden and Cost – NESHAP for Area Sources: Wood Preserving (40 CFR Part 63, Subpart QQQQQQ) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
Report review:								
Initial notification of applicability	2	1	2	0	0	0	0	\$0
Initial notification of compliance status	4	1	4	0	0	0	0	\$0
<b>TOTAL BURDEN AND COST<sup>c</sup></b>						0		\$0

**Assumptions:**

<sup>a</sup> There are 393 existing lead acid battery manufacturing facilities that are area sources. There will be no new additional sources during the next three years of this ICR. The initial rule requirements apply only to new respondents.

<sup>b</sup> 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 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6), and \$27.46 for Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

<sup>c</sup>Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.