

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources
(40 CFR Part 63, Subpart DDDDDD) (Proposed Rule)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule), EPA ICR Number 2454.04, OMB Control Number 2060-0684.

1(b) Short Characterization/Abstract

The current National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers (PVC) Production Area Sources (40 CFR Part 63, Subpart DDDDDD) were proposed on October 6, 2006, promulgated on January 23, 2007 and revised on April 17, 2012. These regulations apply to both existing and new area source PVC production facilities. Major source PVC production facilities are subject to 40 CFR Part 63, Subpart HHHHHHH and are not covered in this ICR. 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, Subpart DDDDDD.

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 office.

The EPA is proposing amendments to 40 CFR Part 63, Subpart DDDDDD to address petitions for reconsideration. In response to the petitions and after gathering additional information from PVC companies, the EPA is proposing revisions to emission limits. The EPA is also proposing other amendments, including technical corrections and clarifications related to the standards for stripped resins, storage vessels (including the use of vapor balancing), equipment leaks, and closed vent systems. The EPA is also proposing to clarify text and correct typographical errors, grammatical errors, and cross-reference errors in both rules. In addition, the EPA is proposing to remove the affirmative defense provisions. The remaining portions of the NESHAP remain unchanged. This information collection request (ICR) documents the

recordkeeping and reporting requirements and incremental burden imposed by the proposed amendments only. This ICR includes the burden for all activities that will be conducted in the first three years following promulgation of the proposed amendments. The only proposed amendment that affects recordkeeping and reporting is the removal of the total non-vinyl chloride organic hazardous air pollutant (TOHAP) wastewater limit, which leads to a reduction in recordkeeping and reporting burden.

The “Affected Public” includes exiting and new PVC production area source facilities. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule). The Federal Government’s ‘burden’ is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule). There are 3 area source facilities, which are owned and operated by the PVC production industry. None of the 3 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 assume that they will all respond to EPA inquiries.

Over the next three years, 3 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. As of August 2020, we are unaware of any facility that has applied for and/or received an air permit to construct a new PVC greenfield facility. Therefore, we assume there is no industry growth. The total labor, capital, and operations and maintenance costs imposed by the proposed amendments will be a cost savings of approximately \$61,000 per year for the first 3 years after the proposed amendments are finalized.

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, hazardous air pollutant (HAP) emissions from PVC production area source 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 DDDDDD.

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 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 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 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 DDDDDD.

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, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

A public notice of this collection is provided in the Federal Register notice of proposed rulemaking published for 40 CFR Part 63, Subpart DDDDDD.

3(c) Consultations

The public will be provided the opportunity to review and comment on the burden estimated in this Information Collection Request during the comment period for the proposed rulemaking.

3(d) Effects of Less-Frequent Collection

40 CFR Part 63, Subpart DDDDDD requires continuous monitoring and semiannual compliance reports. These periodic reports are essential to enforcement of the standards and detection of violations. The ongoing recordkeeping requirements also ensure that monitoring equipment is properly maintained and enhances the reliability of the data that is gathered for this collection.

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.

40 CFR Part 63, Subpart DDDDDD requires owners or operators of facilities to keep and maintain records for a period of five years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

3(f) Confidentiality

All 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 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 PVC production area source 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:

Standard (40 CFR Part 63, Subpart DDDDD)	SIC Codes	NAICS Codes
Plastics Material and Resin Manufacturing	2821	325211

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDD). Note, the reporting and recordkeeping tables below reflect all reporting and recordkeeping requirements imposed by the NESHAP, not just the proposed amendments.

A source must make the following reports:

Notifications	
Initial notification	§ 63.9(b)
Notification of compliance status	§ 63.11142(f)(18)
Notification of performance test	§ 63.9(e)
Notification of inspection	§ 63.11142(f)(18)

Reports	
Compliance report	§ 63.11142(f)(18)
Batch pre-compliance report	§ 63.11142(f)(18)

A source must keep the following records:

Recordkeeping	
A copy of each notification and report submitted to comply with this subpart	§ 63.11142(f)(19)
Records of storage vessels	§ 63.11142(f)(19)
Records of equipment leaks	§ 63.11142(f)(19)
Records of heat exchanger systems	§ 63.11142(f)(19)
Records of process vents	§ 63.11142(f)(19)
Records of closed vent systems	§ 63.11142(f)(9) and § 63.11142(f)(19)
Records of resin strippers	§ 63.11142(f)(19)
Records of process wastewater	§ 63.11142(f)(19)
Records of other emissions sources	§ 63.11142(f)(19)
Keep records for five years	§ 63.11142(f)(19)

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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for flow, temperature, pressure drop, liquid supply pressure, pH, caustic strength, or conductivity for control devices.
Perform initial performance test, Reference Method 18, 23, 25A, 26, 26A, 301, 320 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

Respondent Activities
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:

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 Integrated Compliance Information System (ICIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance 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 this data.

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

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

It is assumed owners or operators of PVC production facilities would stop collecting wastewater samples to comply with the TOHAP emission limit. It is anticipated facilities will read the rule in year 1. The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule).

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. Where 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 a reduction of 340 hours (Total Labor Hours from Table 1 below). These hours are based on review of background documents in development of the proposed amendments to this NESHAP, Agency knowledge and experience with the NESHAP program, and related ICRs.

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.

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

In addition to the labor costs mentioned above, industry costs associated with the information collection activities in 40 CFR Part 63, Subpart DDDDDD include capital/start-up costs and operation and maintenance costs associated with periodic TOHAP wastewater testing. The capital/startup costs are one-time costs when a facility becomes subject to these regulations and include initial wastewater testing. The annual operation and maintenance costs are the ongoing costs to complete periodic wastewater testing, as well as other costs such as photocopying and postage.

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

Below are the estimated capital and startup costs and O&M costs for the respondents subject to 40 CFR Part 63, Subpart DDDDDD for the first three years after promulgation of the proposed amendments.

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

Capital/Startup/O&M Item	(A) Capital/Startup Cost for One Respondent	(B) Number of New Respondent s	(C) Total Capital/ Startup Cost (C = A x B)	(D) Annual O&M Costs for One Respondent	(E) Number of Respondent s with O&M	(F) Total O&M (F = D x E)
Stripped Wastewater: TOHAP Testing ¹	\$539	0	\$0	-\$6,465	3	-\$19,394
Uncontrolled Wastewater: TOHAP Testing ²	\$539	0	\$0	-\$539	3	-\$1,616
Total			\$0			-\$21,000

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

O&M costs shown as negative to reflect savings from no longer performing TOHAP wastewater testing.

¹ Average cost for TOHAP testing is \$538.72 per area source, and 1 test per area source per month.

² TOHAP testing on uncontrolled streams is performed annually. There is 1 uncontrolled stream per facility.

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

The total O&M costs for this ICR are a savings of \$21,000. This is the total of column F.

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 a savings of \$21,000.

6(c) Estimating Agency Burden and Cost

The costs to the Agency are those costs associated with analysis of the reported information. The Agency'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 \$2,300.

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 Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule).

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

The total number of respondents is also referred to as the respondent universe. Based on our research for this ICR, on average over the next three years, approximately three existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is three 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	3	0	0	3
2	0	3	0	0	3
3	0	3	0	0	3
Average	0	3	0	0	3

¹ New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard, existing respondents submit initial notifications.

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 3.

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

Total Annual Responses

Information Collection Activity	(A) Number of Respondents	(B) Number of Responses	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Total Annual Responses (D = (A x B) + C)
1) Initial Notification	0	0	0	0
2) Batch pre-compliance report	0	0	0	0
3) Notification of performance test with test plan	0	0	0	0
4) Notification of compliance status	0	0	0	0
5) Semiannual compliance report	0	0	0	0
6) Notice of inspection	0	0	0	0
			Total	0

The number of Total Annual Responses is 0, because the proposed amendments do not require additional reporting activities.

The total annual labor costs are a savings of \$40,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are a reduction of 340 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule).

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.

The total annual capital/startup and O&M costs to the regulated entity are a savings of \$21,000. 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 46 labor hours at a cost of \$2,300; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule).

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 an overall reduction in the burden hours in this ICR, compared to the previous ICR, due to the elimination of wastewater TOHAP testing requirements.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to save an average of 340 hours and there are not additional responses due to the proposed amendments. ‘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 or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2002-0037. 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) 566-1927. 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- OAR-2002-0037 and OMB Control Number 2060-0684 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule)

Burden Item	(A) Respondent Hours per Occurrence (Technical Hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C = A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E = C x D)	(F) Management Hours per Year (F = E x 0.05)	(G) Clerical Hours per Year (G = E x 0.1)	(H) Total Labor Costs per Year ^b
1. Applications	not applicable							
2. Surveys and Studies	not applicable							
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements ^{c,d}	21	1	21	3	63	3	6	\$8,499
B. Required Activities								
1) Periodic Performance Test, Sampling, and Report								
a) Stripped Wastewater: Non-VC TOHAP ^e	-8	12	-96	3	-288	-14	-29	-\$38,853
b) Uncontrolled Wastewater: Non-VC TOHAP ^e	-8	1	-8	3	-24	-1	-2	-\$3,238
C. Create Information	Incl. in 3.B							
D. Gather Information	Incl. in 3.E							
E. Report Preparation	not applicable ^g							
Subtotal for Reporting Requirements					-286			-\$33,591
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	Incl. in 3.A							
B. Implement Activities	not applicable							
C. Develop Record System	not applicable							
D. Record Information								
1) Records of Non-VC TOHAP Wastewater Requirements	-15	1	-15	3	-45	-2	-5	-\$6,071
E. Personnel Training	Incl. in 3.B							
F. Time for Audits	not applicable							

Burden Item	(A) Respondent Hours per Occurrence (Technical Hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C = A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E = C x D)	(F) Management Hours per Year (F = E x 0.05)	(G) Clerical Hours per Year (G = E x 0.1)	(H) Total Labor Costs per Year ^b
Subtotal for Recordkeeping Requirements						-52		-\$6,071
TOTAL LABOR BURDEN AND COSTS (rounded) ^f						-340		-\$40,000
TOTAL CAPITAL AND O&M COST (rounded) ^f								-\$21,000
GRAND TOTAL (rounded) ^f								-\$61,000

Labor hours and costs shown as negative to reflect savings from no longer performing TOHAP wastewater testing.

^a Assumes that, over the next three years, approximately 3 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

^b Labor rates are \$148.45 for managerial, \$121.46 for technical, and \$60.23 for clerical. These rates 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.

^c One-time only costs.

^d It will take 8 employees 8 hours per person to read and understand the rule requirements, and this was averaged over three years (average of 21 hrs/facility over three years).

^e TOHAP Wastewater testing is estimated to take 4 hours per sample for 2 samples per facility. There is 1 wastewater stream per facility for area sources that is sampled monthly. There 1 uncontrolled wastewater stream per facility that is sampled annually. See Capital/O&M costs for non-VC TOHAP samples.

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

^g The proposed rule revisions do not impact reporting requirements and thus no burden or burden reduction is shown for report preparation.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources (40 CFR Part 63, Subpart DDDDDD) (Proposed Rule)

Burden Item	(A) EPA Person- Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Person- Hours per Plant per Year (C = A x B)	(D) Plants per Year	(E) Technical Person- Hours per Year (E = C x D)	(F) Managemen t Person- Hours per Year (F = E x 0.05)	(G) Clerical Person- Hours per Year (G = E x 0.1)	(H) EPA Total Cost per Year ^b
1. Applications	not applicable							
2. Familiarization with Rule Requirements ^a	8	1	8	5	40	2	4	\$2,275
3. Required Activities								
A. Observe initial performance tests	48	1	48	0	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	24	1	24	0	0	0	0	\$0
C. Create Information	not applicable							
D. Gather Information	not applicable							
E. Report Reviews	not applicable ^c							
F. Prepare annual summary report ^d	32	1	32	0	0	0	0	\$0
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =						n/a	per trip	\$0
TOTAL ANNUAL BURDEN AND COST (rounded) ^e					46			\$2,300

^a Total Number of occurrences is the number of states and EPA Regions with affected sources (3 states + 2 EPA regions = 5 respondents). Assumed 8 hours per state and region to read and understand the rule requirements.

^b Labor rates are \$68.37 for managerial (GS-13, Step 5, \$42.73 + 60%), \$50.72 for technical (GS-12, Step 1, \$31.70 + 60%), and \$27.46 for clerical (GS-6, Step 3, \$17.16 + 60%). These rates from the Office of Personnel Management (OPM), 2018 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 The proposed rule revisions do not impact reporting requirements and thus no burden or burden reduction is shown for report preparation.

^d Using four hours per state (8 states) to write annual summary report.

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