

**ATTACHMENT 1
SUPPORTING STATEMENT**

National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam]

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Flexible Poly

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the]

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Flexible Polyuret

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Flex

Fabrication Operations (40 CFR Part 63, Subpart M)

urethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review – Years 1-3

Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review

ane Foam Fabrication Operations NESHAP Residual Risk and Technology Review - Year 1-3

ible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review

| Respondent Wages (\$2019) | |
|----------------------------------|-----------------------------|
| Category (1) | Hourly Mean Wage (2) |
| Technical | \$50.64 |
| Managerial | \$65.58 |
| Clerical | \$20.45 |

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to NAICS codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Bureau of Labor Statistics table titled "May 2019 National Industry-Specific Employment and Wage Estimates NAICS 326000 - Plastics and Rubber and Miscellaneous Chemical Manufacturing," accessed December 1, 2020 and found here: https://www.bls.gov/oes/current/naics3_326000.htm

(2) Selected "mean hourly wage" in the table referenced in footnote 1. These values are based on May 2019 data, and differ from previous ICR wage values that were based on 2018 data.

(3) Loaded Wage is the 2019 Wage increased by 110 percent to account for fringe and overhead benefits available to those employed by private industry.

| EPA Wages (\$2019) | |
|-------------------------------|-----------------------------|
| Category (1) | Hourly Mean Wage (2) |
| (GS- 12, step 1) - Technical | \$30.90 |
| (GS- 13, step 5) - Managerial | \$41.64 |
| (GS-6, step 3) - Clerical | \$16.72 |

Footnotes:

(1) The hourly mean wage for each category is based on 2019 wages, excluding fringe and overhead benefits.

(2) This value differs from the wages used in the 2019 ICR amendment because it is based on 2018 rates of pay.

(3) Wage with fringe and overhead is the hourly mean wage increased by 110 percent to account for the benefit packages available to government employees.

| |
|------------------------|
| |
| Loaded Wage (3) |
| \$106.35 |
| \$137.72 |
| \$42.95 |

er to the labor category
 es Department of Labor,
 ecific Occupational
 er Products

These values are based
 e based on 2018 data.

nt for the benefit packages

| |
|--|
| |
| Wage With Fringe & Overhead (3) |
| \$49.44 |
| \$66.63 |
| \$26.76 |

and are found here:

[ry-tables/19Tables/html/GS](http://www.bls.gov/tables/19Tables/html/GS)
 ts, which were based on

by 60 percent to account

Table: Annual Respondent Burden and Cost – Flexible Polyurethane Foam Fabrication NESHAP (40 CFR

| Burden item | (A) Person - hours per occurrence | (B) No. of occurrence per respondent per year |
|---|--|--|
| 1. Familiarize with regulatory requirements | 4 | 1 |
| 2. Gather information | 4 | 1 |
| 3. Reports | | |
| a. Initial notification | 2 | 1 |
| b. Application for construction/ reconstruction | 2 | 1 |
| c. Notification of performance test | 2 | 1 |
| d. Notification of compliance status | 20 | 1 |
| e. Initial compliance report | | |
| i. Flame lamination facilities | 8 | 1 |
| ii. Loop slitter facilities | 8 | 1 |
| f. Annual compliance report ^c | 2 | 1 |
| g. Semiannual compliance report | 4 | 2 |
| Reporting Subtotal | | |
| 4. Recordkeeping requirements | | |
| a. Plan activities | 10 | 1 |
| b. Implement activities for flame lamination | | |
| i. Conduct performance test | 50 | 2 |
| ii. Record CPMS calibration and maintenance | 2 | 2 |
| iii. CPMS calibration and maintenance ^e | 4 | 2 |
| c. Implement activities for loop slitters | | |
| i. Record adhesives used and suppliers | 1 | 1 |
| ii. Conduct Method 311 test | 4 | 1 |
| d. Develop record system | | |
| i. CPMS maintenance plan | 20 | 1 |
| e. Time to train personnel | | |
| i. CPMS acquisition and installation | 20 | 1 |
| ii. CPMS inspection and monitoring | 4 | 1 |
| f. Store, file, and maintain all records ^f | 1 | 12 |
| g. Retrieve records/reports ^g | 1 | 12 |
| Subtotal for Recordkeeping Requirements | | |
| TOTAL ANNUAL BURDEN AND COST (ROUNDED) | | |
| Capital and O&M Cost (see Section 6(b)(iii)) | | |
| GRAND TOTAL (rounded)^a | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There w

^b This ICR uses the following labor rates: \$137.72 per hour for Executive, Administrative, and Managerial labor; \$106.35 per United States Department of Labor, Bureau of Labor Statistics, May 2019 National Industry-Specific Occupational Employment have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c Applies to loop slitter adhesive facilities only

^d We have assumed that there will be no new sources expected over the three-year period of this ICR.

^e EPA assumes each respondent will implement CPMS calibration and maintenance activities 50 times per year.

^f We have assumed that one respondent will request to return to semiannual compliance reporting.

^g EPA assumes each respondent will retrieve records/reports 12 times per year.

Table: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Fabric

| Activity | (A) EPA Hours per occurrence | (B) No of occurrences per year |
|--|---------------------------------------|---|
| Review initial notification for existing sources | 4 | 1 |
| Review application for construction/reconstruction | 4 | 1 |
| Review notification of performance test | 4 | 1 |
| Review notification of compliance status | 20 | 1 |
| Review initial compliance report | | |
| Flame lamination facilities | 20 | 1 |
| Loop slitter facilities | 2 | 1 |
| Review annual compliance report ^c | | 1 |
| Review semiannual compliance report | 20 | 1 |
| TOTAL LABOR BURDEN AND COST (rounded) ^d | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be 3 existing sources.

^b This cost is based on the labor rates as described in "Inputs!B8"

^c Applies to Loop Slitter Facilities only

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

Part 63, Subpart M (Amendments)

| (C) | (D) | (E) | (F) | (G) | (H) |
|--|-----------------------------------|---|---|--|-----------------------|
| Person-hours per respondent per year (C=AxB) | Respondents per year ^a | Technical Person - hours per year (E=CxD) | Management person-hours per year (Ex0.05) | Clerical person - hours per year (Ex0.1) | Cost, \$ ^b |
| 4 | 0 | 0 | 0 | 0 | \$0 |
| 4 | 3 | 12 | 0.6 | 1.2 | \$1,410 |
| | | | | | |
| 2 | 0 | 0 | 0 | 0 | \$0 |
| 2 | 0 | 0 | 0 | 0 | \$0 |
| 2 | 1 | 2 | 0.1 | 0.2 | \$235 |
| 20 | 3 | 60 | 3 | 6 | \$7,052 |
| | | | | | |
| 8 | 0 | 0 | 0 | 0 | \$0 |
| 8 | 0 | 0 | 0 | 0 | \$0 |
| 2 | 0 | 0 | 0 | 0 | \$0 |
| 8 | 0 | 0 | 0 | 0 | \$0 |
| | | 85 | | | \$8,697.29 |
| | | | | | |
| 10 | 1 | 10 | 1 | 1 | \$1,175 |
| | | | | | |
| 100 | 0 | 0 | 0 | 0 | \$0 |
| 4 | 0 | 0 | 0 | 0 | \$0 |
| 8 | 0 | 0 | 0 | 0 | \$0 |
| | | | | | |
| 1 | 3 | 3 | 0 | 0 | \$353 |
| 4 | 0 | 0 | 0 | 0 | \$0 |
| | | | | | |
| 20 | 0 | 0 | 0 | 0 | \$0 |
| | | | | | |
| 20 | 0 | 0 | 0 | 0 | \$0 |
| 4 | 0 | 0 | 0 | 0 | \$0 |
| 12 | 3 | 36 | 2 | 4 | \$4,231 |
| 12 | 3 | 36 | 2 | 4 | \$4,231 |
| | | 12 | | | \$1,175 |
| | | 100 | | | \$10,000 |
| | | | | | \$800 |
| | | | | | \$10,000 |

There will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$42.95 per hour for Clerical labor. These rates are from the Rent and Wage Estimates NAICS 326000 - Plastics and Rubber Products Manufacturing,,

ation Operations NESHAP (40 CFR Part 63, Subpart M) (Residual Risk and

| (C) EPA hours per year (C=AxB) | (D) Facilities per year ^a | (E) Technical hours per year (E=CxD) | (F) Managerial hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.1) | (H) Total Cost per Year ^b |
|---|--|--|--|---|--|
| 4 | 2 | 8 | 0.4 | 0.8 | \$574 |
| 4 | 0 | 0 | 0 | 0 | \$0 |
| 4 | 2 | 8 | 0.4 | 0.8 | \$574 |
| 20 | 2 | 40 | 2 | 4 | \$2,871 |
| | | 0 | 0 | 0 | \$0 |
| 20 | 2 | 40 | 2 | 4 | \$2,871 |
| 2 | 0 | 0 | 0 | 0 | \$0 |
| 30 | 3 | 90 | 4.5 | 9 | \$6,460 |
| 20 | 0 | 0 | 0 | 0 | \$0 |
| | | | 220 | | \$13,400 |

There will be no additional sources over the three-year period of this ICR.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|----------|
| Technical | \$106.35 |
| Managerial | \$137.72 |
| | |
| Clerical | \$42.95 |

Technology Review)

| | |
|------------|---------|
| Managerial | \$66.63 |
| Technical | \$49.44 |
| Clerical | \$26.76 |

Table 1 : Annual Respondent Burden and Cost Year One – Flexible Polyurethane Foam Fabrication NESH

| Burden item | (A) Person - hours per occurrence | (B) No. of occurrence per respondent per year |
|---|--|--|
| 1. Applications | N/A | |
| 2. Surveys and studies | N/A | |
| 3. Familiarize with regulatory requirements | 4 | 1 |
| 4. Required activities for sources with add-on control devices | N/A | |
| a. Initial performance test and report | 50 | 1 |
| b. Establish operating parameters | N/A | |
| 5. Required activities for sources using pollution prevention measures | N/A | |
| a. Develop recordkeeping system | See 10.a. | |
| b. Enter information into recordkeeping system | See 5.c. | |
| c. Work practice requirements | N/A | |
| 6. Create information | See 5.c. | |
| 7. Gather information | See 5.c. | |
| Subtotal for Reporting Requirements | | |
| 8. Notification requirements | | |
| a. Initial notification that existing sources are subject to the standard | N/A | |
| b. Notification for new major sources | N/A | |
| c. Request for compliance extension | N/A | |
| d. Notification of special compliance requirements | N/A | |
| e. Notification of performance tests | 2 | 1 |
| f. Notification of compliance status | 20 | 1 |
| 9. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^c | 8 | 2 |
| b. Additional reports for sources with add-on control devices | N/A | |
| 10. Recordkeeping requirements | | |
| a. Familiarize with CEDRI and CDX registration | 4 | 1 |
| b. Plan and develop record system | See 10.a. | |
| c. Record information | 6 | 1 |
| d. Records for area sources not subject to the standard | N/A | |
| 11. Time to train personnel | See 10.a. | |
| 12. Time for audits | N/A | |
| Subtotal for Recordkeeping Requirements | | |
| TOTAL LABOR BURDEN AND COST | | |
| Capital and O&M Cost (see Section 6(b)(iii)) | | |
| GRAND TOTAL (rounded)^d | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There w

^b The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11- table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics : https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit

^cWe have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

IAF (40 CFR Part 63, Subpart M) (Amendments)

| (C) | (D) | (E) | (F) | (G) | (H) |
|--|-----------------------------------|---|---|--|-----------------------|
| Person-hours per respondent per year (C=AxB) | Respondents per year ^a | Technical Person - hours per year (E=CxD) | Management person-hours per year (Ex0.05) | Clerical person - hours per year (Ex0.1) | Cost, \$ ^b |
| | | | | | |
| 4 | 3 | 12 | 0.6 | 1.2 | \$1,410 |
| | | | | | |
| 50 | 2 | 100 | 5 | 10 | \$11,753 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | 129 | | | \$13,163 |
| | | | | | |
| | | | | | |
| | | | | | |
| 2 | 2 | 4 | 0.2 | 0.4 | \$470 |
| 20 | 3 | 60 | 3 | 6 | \$7,052 |
| | | | | | |
| 16 | 3 | 48 | 2.4 | 4.8 | \$5,641 |
| | | | | | |
| | | | | | |
| 4 | 3 | 12 | 0.6 | 1.2 | \$1,410 |
| | | | | | |
| 6 | 3 | 18 | 0.9 | 1.8 | \$2,116 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | 163 | | | \$16,689 |
| | | 292 | | | \$29,853 |
| | | | | | \$0 |
| | | | | | \$30,000 |

There will be no additional sources over the three-year period of this ICR.

1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics and Rubber Products Manufacturing," accessed December 1, 2020 and found here:
: packages available to those employed by private industry.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|----------|
| Technical | \$106.35 |
| Managerial | \$137.72 |
| Clerical | \$42.95 |

Table 2 : Annual Respondent Burden and Cost Year Two – Flexible Polyurethane Foam Fabrication NESI

| Burden item | (A) Person - hours per occurrence | (B) No. of occurrence per respondent per year |
|---|---|---|
| 1. Applications | N/A | |
| 2. Surveys and studies | N/A | |
| 3. Familiarize with regulatory requirements | 0 | 1 |
| 4. Required activities for sources with add-on control devices | | |
| a. Initial performance test and report | N/A | |
| b. Establish operating parameters | N/A | |
| c. Re-evaluating startup, shutdown, and amlfucntion requirements | 0 | 1 |
| 5. Required activities for sources using pollution prevention measures | | |
| a. Develop recordkeeping system | See 10.a. | |
| b. Enter information into recordkeeping system | See 5.c. | |
| | 4 | 12 |
| 6. Create information | See 5.c. | |
| 7. Gather information | See 5.c. | |
| Subtotal for Reporting Requirements | | |
| 8. Notification requirements | | |
| a. Initial notification that existing sources are subject to the standard | N/A | |
| b. Notification for new major sources | N/A | |
| c. Request for compliance extension | N/A | |
| d. Notification of special compliance requirements | N/A | |
| e. Notification of performance tests | N/A | |
| f. Notification of compliance status | N/A | |
| 9. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^c | 8 | 2 |
| b. Additional reports for sources with add-on control devices | N/A | |
| 10. Recordkeeping requirements | | |
| a. Familiarize with CEDRI and CDX registration | 0 | 1 |
| b. Plan and develop record system | See 10.a. | |
| c. Record information | 6 | 1 |
| d. Records for area sources not subject to the standard | N/A | |
| 11. Time to train personnel | See 10.a. | |
| 12. Time for audits | N/A | |
| Subtotal for Recordkeeping Requirements | | |
| TOTAL LABOR BURDEN AND COST | | |
| Capital and O&M Cost (see Section 6(b)(iii)) | | |
| GRAND TOTAL (rounded)^d | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There w

^b The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11- table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics : https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit

^cWe have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

IAP (40 CFR Part 63, Subpart M) (Amendments)

| (C) | (D) | (E) | (F) | (G) | (H) |
|--|-----------------------------------|---|---|--|-----------------------|
| Person-hours per respondent per year (C=AxB) | Respondents per year ^a | Technical Person - hours per year (E=CxD) | Management person-hours per year (Ex0.05) | Clerical person - hours per year (Ex0.1) | Cost, \$ ^b |
| | | | | | |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| | | | | | |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| | | | | | |
| 48 | 0 | 0 | 0 | 0 | \$0 |
| | | | | | |
| | | | | | |
| | | 0 | | | \$0.00 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 16 | 3 | 48 | 2.4 | 4.8 | \$5,641 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| 6 | 3 | 18 | 0.9 | 1.8 | \$2,116 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | 76 | | | \$7,757 |
| | | 76 | | | \$7,757 |
| | | | | | \$0 |
| | | | | | \$8,000 |

There will be no additional sources over the three-year period of this ICR.

1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics and Rubber Products Manufacturing," accessed December 1, 2020 and found here:
: packages available to those employed by private industry.

| 2013 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|----------|
| Technical | \$106.35 |
| Managerial | \$137.72 |
| Clerical | \$42.95 |

Table 3 : Annual Respondent Burden and Cost Year Three – Flexible Polyurethane Foam Fabrication NES

| Burden item | (A) Person - hours per occurrence | (B) No. of occurrence per respondent per year |
|---|---|---|
| 1. Applications | N/A | |
| 2. Surveys and studies | N/A | |
| 3. Familiarize with regulatory requirements | 0 | 1 |
| 4. Required activities for sources with add-on control devices | | |
| a. Initial performance test and report | N/A | |
| b. Establish operating parameters | N/A | |
| c. Re-evaluating startup, shutdown, and amlfucntion requirements | 0 | 1 |
| 5. Required activities for sources using pollution prevention measures | | |
| a. Develop recordkeeping system | See 10.a. | |
| b. Enter information into recordkeeping system | See 5.c. | |
| | N/A | |
| 6. Create information | See 5.c. | |
| 7. Gather information | See 5.c. | |
| Subtotal for Reporting Requirements | | |
| 8. Notification requirements | | |
| a. Initial notification that existing sources are subject to the standard | N/A | |
| b. Notification for new major sources | N/A | |
| c. Request for compliance extension | N/A | |
| d. Notification of special compliance requirements | N/A | |
| e. Notification of performance tests | N/A | |
| f. Notification of compliance status | N/A | |
| 9. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^c | 8 | 2 |
| b. Additional reports for sources with add-on control devices | N/A | |
| 10. Recordkeeping requirements | | |
| a. Familiarize with CEDRI and CDX registration | 0 | 1 |
| b. Plan and develop record system | See 10.a. | |
| c. Record information | 6 | 1 |
| d. Records for area sources not subject to the standard | N/A | |
| 11. Time to train personnel | See 10.a. | |
| 12. Time for audits | N/A | |
| Subtotal for Recordkeeping Requirements | | |
| TOTAL LABOR BURDEN AND COST | | |
| Capital and O&M Cost (see Section 6(b)(iii)) | | |
| GRAND TOTAL (rounded)^d | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There w

^b The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11- table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics : https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit

^cWe have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

SHAP (40 CFR Part 63, Subpart M) (Amendments)

| (C) | (D) | (E) | (F) | (G) | (H) |
|---|---|--|--|---|-----------------------------|
| Person-hours per respondent per year (C=AxB) | Respondents per year^a | Technical Person - hours per year (E=CxD) | Management person-hours per year (Ex0.05) | Clerical person - hours per year (Ex0.1) | Cost, \$^b |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | 0 | | \$0.00 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 16 | 3 | 48 | 2.4 | 4.8 | \$5,641 |
| | | | | | |
| 0 | 3 | 0 | 0 | 0 | \$0 |
| | | | | | |
| 6 | 3 | 18 | 0.9 | 1.8 | \$2,116 |
| | | | | | |
| | | | | | |
| | | | 76 | | \$7,757 |
| | | | 76 | | \$7,757 |
| | | | | | \$0 |
| | | | | | \$8,000 |

There will be no additional sources over the three-year period of this ICR.

1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics and Rubber Products Manufacturing," accessed December 1, 2020 and found here:
: packages available to those employed by private industry.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|----------|
| Technical | \$106.35 |
| Managerial | \$137.72 |
| Clerical | \$42.95 |

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requi

| Year | Technical Hours | Management Hours | Clerical Hours | Total Labor Hours | Labor Costs | Non-Labor (Capital/Startup and O&M) Costs |
|-------------|------------------------|-------------------------|-----------------------|--------------------------|--------------------|--|
| 1 | 254 | 13 | 25 | 292 | \$29,853 | \$0 |
| 2 | 66 | 3 | 7 | 76 | \$7,757 | \$0 |
| 3 | 66 | 3 | 7 | 76 | \$7,757 | \$0 |
| Total | 386 | 19 | 39 | 444 | \$45,367 | \$0 |
| Average | 129 | 6 | 13 | 148 | \$15,100 | \$0 |

Requirements for the Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart

| |
|--------------------|
| Total Costs |
| \$30,000 |
| \$8,000 |
| \$8,000 |
| \$46,000 |
| \$15,000 |

t MMMMM) (Amendments)

Table 5: Average Annual EPA Burden and Cost Year One – NESHAP for Flexible Polyurethane F

| Activity | (A) EPA Hours per occurrence | (B) No of occurrences per year |
|---|---------------------------------------|---|
| 1. Read instructions | N/A | |
| 2. Enter and update information into agency recordkeeping system ^c | 4 | 1 |
| 3. Notification review ^d | | |
| a. Review initial notification for existing sources | N/A | |
| b. Notification for new major sources ^e | N/A | |
| c. Review request for compliance extension | N/A | |
| d. Review special compliance requirements | N/A | |
| e. Review initial performance test and test plan | 4 | 1 |
| f. Review compliance status ^f | 2 | 1 |
| g. Area sources not subject to standard | N/A | |
| h. Review waiver application | N/A | |
| 4. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^g | 4 | 2 |
| TOTAL LABOR BURDEN AND COST (rounded) ^h | | |

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be 3 existing sources.
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule”, which excludes local government rates.
- ^c We have assumed that it will take 4 hours to enter and update information into agency recordkeeping system.
- ^d We have assumed that all existing sources will be in compliance in year one.
- ^e We have assumed that there will be not new sources over the three-year period of this ICR.
- ^f We have assumed that it will take 2 hours to review the compliance status notification.
- ^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

| (C) EPA hours per year (C=AxB) | (D) Facilities per year ^a | (E) Technical hours per year (E=CxD) | (F) Managerial hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.1) | (H) Total Cost per Year ^a |
|---|--|--|--|---|--|
| | | | | | |
| 4 | 3 | 12 | 0.6 | 1.2 | \$665.37 |
| | | | | | |
| | | | | | |
| | | | | | |
| 4 | 2 | 8 | 0.4 | 0.8 | \$443.58 |
| 2 | 3 | 6 | 0.3 | 0.6 | \$332.69 |
| | | | | | |
| | | | | | |
| 8 | 3 | 24 | 1.2 | 2.4 | \$1,330.74 |
| | | | 60 | | \$2,800 |

There will be no additional sources over the three-year period of this ICR.

Overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76
wage and benefit rates of pay.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|---------|
| Technical | \$49.44 |
| Managerial | \$66.63 |
| Clerical | \$26.76 |

Table 6: Average Annual EPA Burden and Cost Year Two – NESHAP for Flexible Polyurethane I

| Activity | (A) EPA Hours per occurrence | (B) No of occurrences per year |
|---|---------------------------------------|---|
| 1. Read instructions | N/A | |
| 2. Enter and update information into agency recordkeeping system ^c | 4 | 1 |
| 3. Notification review ^d | | |
| a. Review initial notification for existing sources | N/A | |
| b. Notification for new major sources ^e | N/A | |
| c. Review request for compliance extension | N/A | |
| d. Review special compliance requirements | N/A | |
| e. Review initial performance test and test plan | N/A | |
| f. Review compliance status ^f | 2 | 1 |
| g. Area sources not subject to standard | N/A | |
| h. Review waiver application | N/A | |
| 4. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^g | 4 | 2 |
| TOTAL LABOR BURDEN AND COST (rounded) ^h | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be 1 new source.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule”, which excludes local government rates.

^c We have assumed that it will take 4 hours to enter and update information into agency recordkeeping system.

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

Foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

| (C) EPA hours per year (C=AxB) | (D) Facilities per year ^a | (E) Technical hours per year (E=CxD) | (F) Managerial hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.1) | (H) Total Cost per Year ^a |
|---|--|--|--|---|--|
| 4 | 3 | 12 | 0.6 | 1.2 | \$665.37 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 2 | 3 | 6 | 0.3 | 0.6 | \$332.69 |
| | | | | | |
| | | | | | |
| 8 | 3 | 24 | 1.2 | 2.4 | \$1,330.74 |
| | | | 50 | | \$2,400 |

There will be no additional sources over the three-year period of this ICR.

Estimated overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76 Clerical rate. Quality rates of pay.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|---------|
| Technical | \$49.44 |
| Managerial | \$66.63 |
| Clerical | \$26.76 |

Table 7: Average Annual EPA Burden and Cost Year Three – NESHAP for Flexible Polyurethane

| Activity | (A) EPA Hours per occurrence | (B) No of occurrences per year |
|---|---------------------------------------|---|
| 1. Read instructions | N/A | |
| 2. Enter and update information into agency recordkeeping system ^c | 4 | 1 |
| 3. Notification review ^d | | |
| a. Review initial notification for existing sources | N/A | |
| b. Notification for new major sources ^e | N/A | |
| c. Review request for compliance extension | N/A | |
| d. Review special compliance requirements | N/A | |
| e. Review initial performance test and test plan | N/A | |
| f. Review compliance status ^f | 2 | 1 |
| g. Area sources not subject to standard | N/A | |
| h. Review waiver application | N/A | |
| 4. Reporting requirements | | |
| a. Semiannual compliance reports for all sources ^g | 4 | 2 |
| TOTAL LABOR BURDEN AND COST (rounded) ^h | | |

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be 3 existing sources.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule”, which excludes local government rates.

^c We have assumed that it will take 4 hours to enter and update information into agency recordkeeping system.

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

: Foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

| (C) EPA hours per year (C=AxB) | (D) Facilities per year ^a | (E) Technical hours per year (E=CxD) | (F) Managerial hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.1) | (H) Total Cost per Year ^a |
|---|--|--|--|---|--|
| 4 | 3 | 12 | 0.6 | 1.2 | \$665.37 |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 2 | 3 | 6 | 0.3 | 0.6 | \$332.69 |
| | | | | | |
| | | | | | |
| 8 | 3 | 24 | 1.2 | 2.4 | \$1,330.74 |
| | | | 50 | | \$2,400 |

There will be no additional sources over the three-year period of this ICR.
 Management overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76
 hourly wage rates of pay.

| 2019 ICR Wages | |
|-----------------------|--|
|-----------------------|--|

| | |
|------------|---------|
| Technical | \$49.44 |
| Managerial | \$66.63 |
| Clerical | \$26.76 |

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting

| Year | Technical Hours | Management Hours | Clerical Hours | Total Hours | Labor Costs | Non-Labor Costs |
|-------------|------------------------|-------------------------|-----------------------|--------------------|--------------------|------------------------|
| 1 | 50 | 3 | 5 | 58 | \$2,800 | \$0 |
| 2 | 42 | 2 | 4 | 48 | \$2,400 | \$0 |
| 3 | 42 | 2 | 4 | 48 | \$2,400 | \$0 |
| Total | 134 | 7 | 13 | 154 | \$7,600 | \$0 |
| Average | 45 | 2 | 4 | 51 | \$2,500 | \$0 |

Requirements for the Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, St

| Total Costs |
|--------------------|
| \$2,800 |
| \$2,400 |
| \$2,400 |
| \$7,600 |
| \$2,500 |

ibpart MMMMM) (Amendments)