

**Table 1: Annual Respondent Burden and Cost – NESHAP for Epoxy Resin and Non-Nylon**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	1	1
B. Required activities <sup>c</sup>		
Basic liquid resins (BLR)	1,050	1
Repeat initial performance test - process vents	1,050	1
Initial performance test - wastewater	270	1
Repeat initial performance test – wastewater	270	1
Wet strength resins (WSR) <sup>d</sup>	270	1
C. Create information	See 3B, 4D, 4E	
D. Gather existing information	See 3B, 4D, 4E	
E. Write report		
Notification of construction/reconstruction <sup>c</sup>	2	1
Notification of physical/operational changes <sup>e</sup>	2	1
Notification of anticipated startup <sup>c</sup>	2	1
Notification of actual startup <sup>c</sup>	2	1
Notification of applicability of the standard – existing sources <sup>c</sup>	2	1
Notification of applicability of the standard – new sources <sup>c</sup>	2	1
Notification of initial performance test <sup>c</sup>	2	1
Report of initial test (including CMS performance evaluation and results) <sup>c</sup>	6	1
Submit quality control plan for CMS <sup>c, f</sup>	2	1
Submit startup, shutdown, malfunction plan <sup>c</sup>	2	1
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	16	4
Report of no excess emissions <sup>h</sup>	8	4
Report of area source becoming major <sup>i</sup>	6	1
Waiver application <sup>j</sup>	6	1
Compliance status information report <sup>c</sup>	4	1
Submit semiannual SSM reports <sup>k</sup>	2	2
Submit immediate reports of inconsistent procedures monitored at each affected source <sup>h</sup>	2	1
Submit a CMS summary report for HAP monitored at each affected source <sup>l</sup>	2	1
<b>Subtotal for Reporting Requirements</b>		
4. Recordkeeping requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	See 3A	
B. Plan activities	N/A	
C. Implement activities	See 4D, 4E	
D. Develop record system <sup>c</sup>	40	1
E. Time to enter information		
a. Records of control device monitoring parameters:		
- Continuously monitored parameters <sup>l, m</sup>	12	52
- LDAR program reporting and recordkeeping – BLR <sup>l</sup>	311	1
- LDAR program reporting and recordkeeping – WSR <sup>n</sup>	11	1
- Wastewater parameters <sup>l, o</sup>	2	12

F. Other recordkeeping activities		
a. Maintain records of occurrence and duration of each SSM of process and control equipment <sup>h, p</sup>	2	8
b. Maintain records of maintenance performed on air pollution control equipment <sup>h</sup>	2	4
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan <sup>h, q</sup>	2	1
d. Maintain records of each period during which a CMS is malfunctioning or inoperative <sup>l</sup>	2	1
e. Maintain records of result of all performance test and performance evaluations <sup>c</sup>	2	1
f. Maintain all initial notification and compliance status notifications <sup>c</sup>	1	1
G. Time for audits	N/A	
<b>Subtotal for Recordkeeping Requirements</b>		
<b>Total Labor Burden and Costs (rounded)<sup>r</sup></b>		
<b>Total Capital and O&amp;M Cost (rounded)<sup>r</sup></b>		
<b>Grand Total (rounded)<sup>r</sup></b>		

Assumptions:

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be seven, which consists of the additional new sources per year that will become subject to the rule over the three-year period of this ICR. We assume

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$148.45 for managerial, \$121.46 for technical Statistics, March 2020, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column available to those employed by private industry.

<sup>c</sup> We have assumed that this is a one-time-only cost. Records for one-time reporting activities must only be retained for

<sup>d</sup> For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, storage H - leak detection and repair program for equipment leaks. Because it is more cost effective, we have assumed that a the continuous monitoring systems (CMS) installed.

<sup>e</sup> We have assumed that one facility will have a physical or operational change.

<sup>f</sup> We have assumed that it will require one test each for wastewater and process vents.

<sup>g</sup> We have assumed that only one facility will have excess emissions.

<sup>h</sup> We have assumed that there are seven sources that are subject to this regulation, so the number of sources without a

<sup>i</sup> We have assumed that no area sources are expected to become major sources.

<sup>j</sup> We have assumed that one facility will require a waiver.

<sup>k</sup> We have assumed that it will take each respondent two hours to submit semiannual (SSM) reports. Also quarterly

<sup>l</sup> We have assumed that there are three basic liquid resins (BLR) manufacturing facilities.

<sup>m</sup> We have assumed that these parameters will automatically be recorded with a data logger.

<sup>n</sup> We have assumed that there are four WSR facilities subject to the rule.

<sup>o</sup> We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.

<sup>p</sup> We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility

<sup>q</sup> We have assumed that it will take two hours once per year for each facility to maintain records for one deviation from

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

**Polyamide Production (40 CFR Part 63, Subpart W) (Renewal)**

(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
1	7	7	0.4	0.7	\$944
1,050	0	0	0	0	\$0
1,050	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
2	0	0	0	0	\$0
2	1	2	0.1	0.2	\$269.81
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
6	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
64	1	64	3.2	6.4	\$8,633.95
32	6	192	9.6	19.2	\$25,901.86
6	0	0	0	0	\$0
6	1	6	0.3	0.6	\$809.43
4	0	0	0	0	\$0
4	7	28	1.4	2.8	\$3,777.35
2	7	14	0.7	1.4	\$1,888.68
2	3	6	0.3	0.6	\$809.43
			<b>367</b>		<b>\$43,035</b>
40	0	0	0	0	\$0
624	3	1,872	94	187	\$252,543.10
311	3	933	47	93	\$125,866.83
11	4	44	2.2	4.4	\$5,935.84
24	3	72	3.6	7.2	\$9,713.20

16	7	112	5.6	11	\$15,109.42
8	7	56	2.8	5.6	\$7,554.71
2	7	14	0.7	1.4	\$1,888.68
2	3	6	0.3	0.6	\$809.43
2	0	0	0	0	\$0
1	0	0	0	0	\$0
			<b>3,575</b>		<b>\$419,421</b>
			<b>3,940</b>		<b>\$462,000</b>
					<b>\$14,000</b>
					<b>\$476,000</b>

three basic liquid epoxy resins (BLR) plants and four wet strength resins (WSR) plants. There will be no fee that each respondent will have to familiarize with the regulatory requirements each year.

..., and \$60.23 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages

for five years. The five year period after these initial activities precedes the period covered by this ICR renewal.

For air tanks, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart G. All WSR facilities will choose to comply with the alternative standard. These facilities are not required to have

an excess emissions report is six.

Reporting may be reduced to semiannual reporting for sources that are in compliance for one year.

by.  
from SSM plans.

Labor Rates	
Management	\$148.45
Technical	\$121.46
Clerical	\$60.23

Number of responses	54
Hours per response	73

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Epoxy Resin and Non-Nylon Polyamide 63, Subpart W) (Renewal)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (Cx D)
Report review					
Notification of construction/reconstruction and startup <sup>c</sup>	2	1	2	0	0
Notification of physical and operational changes <sup>d</sup>	2	1	2	1	2
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0
Notification of actual startup <sup>c</sup>	2	1	2	0	0
Notification of applicability of the standard new sources <sup>c</sup>	2	1	2	0	0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0
Report of initial test <sup>c</sup>	8	1	8	0	0
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0	0
Quality control plan for CMS <sup>c</sup>	4	1	4	0	0
Semiannual SSM reports <sup>e, f</sup>	4	2	8	7	56
CMS summary report for HAP	4	1	4	3	12
Immediate reports of inconsistent procedures	4	1	4	7	28
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	8	4	32	1	32
Report of no excess emission	2	4	8	6	48
Waiver application <sup>h</sup>	8	1	8	1	8
<b>TOTAL (rounded) <sup>i</sup></b>					

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be seven, which consists of three liquid strength resins (WSR) plants. There will be no additional new sources per year that will become subject to the rule over the th

<sup>b</sup> This ICR uses the following labor rates: \$68.37 for managerial, \$50.72 for technical, and \$27.46 for clerical labor. These rates are based on the General Schedule (GS), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent available to government employees.

<sup>c</sup> We have assumed that this is a one-time-only cost.

<sup>d</sup> We have assumed that only one facility will conduct some form of physical or operational change.

<sup>e</sup> We have assumed that there are 7 sources that are subject to this regulation that report semiannually.

<sup>f</sup> We have assumed that it will take four hours to review semiannual reports.

<sup>g</sup> We have assumed that one facility will have excess emissions.

<sup>h</sup> We have assumed that one facility will request a waiver.

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

**mid Production (40 CFR Part**

(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
0	0	\$0
0.1	0.2	\$113.77
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.8	5.6	\$3,185.53
0.6	1.2	\$682.61
1.4	2.8	\$1,592.77
1.6	3.2	\$1,820.30
2.4	4.8	\$2,730.46
0.4	0.8	\$455.08
<b>214</b>		<b>\$10,600</b>

Labor Rates	
Management	\$68.37
Technical	\$50.72
Clerical	\$27.46

l epoxy resins (BLR) plants and four wet  
ree-year period of this ICR.

es are from the Office of Personnel  
nt to account for the benefit packages

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>1</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	1	7	0	1	7
2	1	7	0	1	7
3	1	7	0	1	7
Average	1	7	0	1	7

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Continuous Monitoring System <sup>a, b</sup>	\$3,899	0	\$0	\$4,679	3
Total <sup>c</sup>			\$0		

<sup>a</sup> There are 3 BLR facilities and 4 WSR facilities, for a total of 7 respondents. We assume all 4 WSR facilities will choose the alternative standard at 40 CFR Part 63, Subpart H for leak detection and repair program for equipment leaks. Therefore, all WSR facilities are required to have CMS installed.

<sup>b</sup> Capital/startup costs and O&M costs have been updated from 1998 dollars to 2019 dollars using the CEPCI CE Index.

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

<b>Total Annual Responses</b>		
(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Notification of physical and operational changes	1	1
Report of monitoring exceedances and periods of noncompliance	1	4
Report of no excess emissions	6	4
Waiver application	1	1
SSM report	7	2
Immediate report of inconsistent procedures	7	1
CMS summary report	3	1

(G)
Total O&M, (E x F)
\$14,037
\$14,000

1998 CEPCI CE Index	389.5
2019 CEPCI CE Index	607.5

e to comply with  
re, they are not

(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
N/A	1
N/A	4
N/A	24
	1
N/A	14
N/A	7
N/A	3
Total	54