

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal), EPA ICR Number 0186.16, OMB Control Number 2060-0071.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Vinyl Chloride (40 CFR Part 61 Subpart F) were proposed on December 24, 1975; and promulgated on October 21, 1976. These regulations apply to existing facilities and new facilities that produce ethylene dichloride (EDC) by reaction of the following: (1) oxygen and hydrogen chloride with ethylene; (2) vinyl chloride (VC) by any process; and (3) one or more polymers containing any fraction of polymerized VC (i.e., polyvinyl chloride (PVC)). This subpart does not apply to equipment used in research and development if the reactor used to polymerize the VC has a capacity of no more than 0.19 cubic meters (m<sup>3</sup>). New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 61, Subpart F.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners / operators of the affected facilities. The owners and/or operators 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 and/or operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least three 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.

All of the EDC, PVC and VC facilities in the United States are owned and operated by the vinyl chloride industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all privately-owned, for-profit businesses. We assume that they will all respond to EPA enquiries. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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 Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart

F) (Renewal).

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

Over the next three years, approximately 16 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same 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, vinyl chloride emissions from EDC, PVC, and VC plants 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 61, Subpart F.

### **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 same 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 the Agency or delegated authority when a source becomes subject to the requirements of these 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 the standards are being met. The performance test may also be observed.

The required quarterly 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 61, Subpart F.

#### **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, duplication does not exist.

#### **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* (86 FR 8634) on February 8, 2021. No comments were received on the burden published in the *Federal Register* for this 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 these standards, 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 16 respondents will be subject to these standards over the three-year period covered by this ICR. This estimate is based on a review of data from EPA's Greenhouse Gas Reporting Program.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both The Vinyl Institute (VI), at (202) 765-2200, and the American Chemistry Council (ACC), at (202) 249-6512.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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.

### **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 (CBI) (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 EDC, PVC, and VC plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 2821 which corresponds to the North American Industry Classification System (NAICS) 325211 for Plastics Material and Resin Manufacturing.

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F).

A source must make the following reports:

<b>Notifications</b>	
Notification and application of construction or modification	§61.07
Notification of anticipated date of initial startup	§61.09(a)(1)
Notification of actual startup	§61.09(a)(2)
Notification of emissions testing	§61.13(c)
Application for waiver of testing	§61.13(i)
Notification of physical or operational change which may increase the emission rate	§61.15
Application for equivalent equipment and procedures	§61.66

<b>Reports</b>	
Report of emission tests	§61.13(f)
Manual vent valve (MVV) discharge report	§61.64(a)(3)
Relief valve discharge (RVD) report	§61.65(a)
Initial report	§61.69
Quarterly report	§61.70

A source must keep the following records:

<b>Recordkeeping</b>	
Emission test results and other data needed to determine emissions	§§61.13(g), 61.71(a)(3)
Startup, shutdown, malfunction, periods where the continuous monitoring system is inoperative	§61.14(f)
Performance test records, leaks detected, emissions records, and daily operating records are required to be retained on-site for three years	§§61.67(f), 61.71(a)
Records of leak detected	§§61.71(a)(1), 61.71(a)(2)
Daily operating record for each polyvinyl chloride reactor, including pressures and temperatures	§61.71(a)(4)

### 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 vinyl chloride CMS.
Perform initial performance test, Reference Method 106, 107, and/or 601 tests, 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.

<b>Respondent Activities</b>
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**

The 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 these 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 quarterly 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. The 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 the data.

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

### **5(c) Small Entity Flexibility**

The 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 these regulations. 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 Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

## **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 6,540 hours (Total Labor Hours from Table 1 below). 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)
Clerical	\$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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

The type of industry costs associated with the information collection activities in the subject standards 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 these regulations. 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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
CEMS	\$150,000	0	\$0	\$45,000	16	\$720,000

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 \$720,000. 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 \$720,000. These are the

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 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 \$36,800.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

**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 16 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 16 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)

<b>Number of Respondents</b>					
1	0	16	0	0	16
2	0	16	0	0	16
3	0	16	0	0	16
Average	0	16	0	0	16

<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 16.

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

The total annual labor hours are 6,540 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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 82 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$720,000. 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 736 labor hours at a cost of \$36,800; see below in Table 2: Average Annual EPA Burden and Cost – NESHP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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 no change in burden from the most recently-approved ICR as currently identified in the OMB Inventory of Approved Burdens. This situation is due to two considerations: (1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and (2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. The estimate of the number of respondents is based on a review of data from EPA's Greenhouse Gas Reporting Program. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 82 hours per response. '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 nor 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-OAR-2020-0625. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. 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-2020-0625 and OMB Control Number 2060-0071 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 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per occurrence <sup>e</sup>	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	4	4	16	64	3.2	6.4	\$8,719.36
B. Required activities								
Initial performance test <sup>d</sup>	60	1	60	0	0	0	0	\$0
Repeat performance tests <sup>e</sup>	60	0.2	12	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write Report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of emission testing	2	1	2	0	0	0	0	\$0
Notification of test report	2	1	2	0	0	0	0	\$0
Notification of physical or operational change <sup>f</sup>	2	1	2	0	0	0	0	\$0
Application for waiver of testing <sup>g</sup>	8	1	8	0	0	0	0	\$0
Application of equivalency <sup>h</sup>	40	1	40	0	0	0	0	\$0

Initial report	24	1	24	0	0	0	0	\$0
Quarterly report <sup>i</sup>	50	4	200	16	3,200	160	320	\$435,968.00
MVV/RVD report <sup>j</sup>	8	1	8	16	128	6.4	12.8	\$17,438.72
<b>Subtotal for Reporting Requirements</b>						<b>3,901</b>		<b>\$462,126</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3D							
D. Develop record system	N/A							
E. Time to enter information								
Records of reactor parameters and emission <sup>k</sup>	0.25	365	91.25	16	1,460	73	146	\$198,910.40
Records of leaks detected <sup>l</sup>	1	52	52	16	832	41.6	83.2	\$113,351.68
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,636</b>		<b>\$312,262</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded) <sup>m</sup></b>						<b>6,540</b>		<b>\$774,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>m</sup></b>								<b>\$720,000</b>
<b>GRAND TOTAL (rounded) <sup>m</sup></b>								<b>\$1,490,000</b>

**Assumptions:**

<sup>a</sup> We estimate there are 16 existing sources subject to the standard and no additional sources will become subject over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$149.84 for managerial labor, \$122.66 for technical labor, and \$60.88 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, September 2020. The rates have been increased by 110 percent to account for overhead.

<sup>c</sup> We have assumed that all sources will have to familiarize with the regulatory requirements quarterly.

<sup>d</sup> We have assumed that it will take 60 hours to complete the performance tests.

<sup>e</sup> We have assumed that 20 percent of initial performance tests must be repeated due to failure.

<sup>f</sup> Assumed that there will be no physical or operational changes over the next three years.

- <sup>g</sup> Assume it will take eight hours to prepare application for waiver of testing.
- <sup>h</sup> Assume it will take 40 hours to prepare application for equivalency.
- <sup>i</sup> We have assumed that it will take 50 hours to prepare the quarterly report.
- <sup>j</sup> We have estimated that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.
- <sup>k</sup> Assume that affected facilities will operate 365 days per year as required of all facilities that are subject to the rule.
- <sup>l</sup> It is estimated that respondents will enter records of leak detection 52 times per year.
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) <sup>b</sup>
1. Initial performance test <sup>c</sup>	24	1	24	0	0	0	0	\$0
2. Repeat performance test <sup>d</sup>	24	0.2	4.8	0	0	0	0	\$0
3. Report review								
Notification of construction/reconstruction	1	1	1	0	0	0	0	\$0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of emission testing	0.5	1	0.5	0	0	0	0	\$0
Notification of physical or operational change <sup>e</sup>	0.5	1	0.5	0	0	0	0	\$0
Emission test report <sup>f</sup>	24	1	24	0	0	0	0	\$0
Application for waiver of testing <sup>g</sup>	24	1	24	0	0	0	0	\$0
Application for equivalency	24	1	24	0	0	0	0	\$0
Initial report	24	1	24	0	0	0	0	\$0
Quarterly report <sup>h</sup>	4	4	16	16	256	12.8	25.6	\$14,708.48
MVV/RVD report <sup>i</sup>	24	1	24	16	384	19.2	38.4	\$22,062.72
<b>TOTAL ANNUAL BURDEN (rounded) <sup>j</sup></b>						<b>736</b>		<b>\$36,800</b>

**Assumptions:**

<sup>a</sup> We estimate there are 16 existing sources subject to the standard and no additional sources will become subject over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$69.04 for

Managerial (GS-13, Step 5, \$43.15 x 1.6), \$51.23 for Technical (GS-12, Step 1, \$32.02 x 1.6) and \$27.73 Clerical (GS-6, Step 3, \$17.33 x 1.6). These rates are from the Office of Personnel Management (OPM) 2021 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that it will take twenty-four hours to complete the performance tests.

<sup>d</sup> We have assumed that 20 percent of initial performance tests must be repeated due to failure.

<sup>e</sup> Assume that there will be no physical or operational changes over the next three years.

<sup>f</sup> It is assumed that it will take twenty-four hours to review an emissions test report.

<sup>g</sup> Assume that it will take twenty-four hours to review application for waiver of test.

<sup>h</sup> We have assumed that it will take four hours to review the quarterly report.

<sup>i</sup> We have assumed that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.

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