

Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, S

| Burden item | (A) | (B) | (C) | (D) |
|--|-----------------------------|--|--|-----------------------------------|
| | Person-hours per occurrence | No. of occurrences per respondent per year | Person-hours per respondent per year (C=AxB) | Respondents per year ^a |
| 1. Applications | N/A | | | |
| 2. Survey and Studies | N/A | | | |
| 3. Reporting requirements | | | | |
| A. Familiarize with regulatory requirements ^c | 1 | 4 | 4 | 16 |
| B. Required activities | | | | |
| Initial performance test ^d | 60 | 1 | 60 | 0 |
| Repeat performance tests ^e | 60 | 0.2 | 12 | 0 |
| C. Create information | See 3B | | | |
| D. Gather existing information | See 3B | | | |
| E. Write Report | | | | |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 |
| Notification of anticipated startup | 2 | 1 | 2 | 0 |
| Notification of actual startup | 2 | 1 | 2 | 0 |
| Notification of emission testing | 2 | 1 | 2 | 0 |
| Notification of test report | 2 | 1 | 2 | 0 |
| Notification of physical or operational change ^f | 2 | 1 | 2 | 0 |
| Application for waiver of testing ^g | 8 | 1 | 8 | 0 |
| Application of equivalency ^h | 40 | 1 | 40 | 0 |
| Initial report | 24 | 1 | 24 | 0 |
| Quarterly report ⁱ | 50 | 4 | 200 | 16 |
| MVV/RVD report ^j | 8 | 1 | 8 | 16 |
| Subtotal for Reporting Requirements | | | | |
| 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 ^k | 0.25 | 365 | 91.25 | 16 |
| Records of leaks detected ^l | 1 | 52 | 52 | 16 |
| F. Time to train personnel | N/A | | | |
| G. Time for audits | N/A | | | |
| Subtotal for Recordkeeping Requirements | | | | |
| TOTAL ANNUAL BURDEN AND LABOR COST (rounded) ^m | | | | |
| TOTAL CAPITAL AND O&M COST (rounded) ^m | | | | |
| GRAND TOTAL (rounded) ^m | | | | |

Assumptions:

- ^a We estimate there are 16 existing sources subject to the standard and no additional sources will become subject over the th
- ^b This ICR uses the following labor rates: \$149.84 for managerial labor, \$122.66 for technical labor, and \$60.88 for clerical
- ^c We have assumed that all sources will have to familiarize with the regulatory requirements quarterly.
- ^d We have assumed that it will take 60 hours to complete the performance tests.
- ^e We have assumed that 20 percent of initial performance tests must be repeated due to failure.
- ^f Assumed that there will be no physical or operational changes over the next three years.
- ^g Assume it will take eight hours to prepare application for waiver of testing.
- ^h Assume it will take 40 hours to prepare application for equivalency.
- ⁱ We have assumed that it will take 50 hours to prepare the quarterly report.
- ^j We have estimated that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.
- ^k Assume that affected facilities will operate 365 days per year as required of all facilities that are subject to the rule.
- ^l It is estimated that respondents will enter records of leak detection 52 times per year.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ubpart F) (Renewal)

122.66 149.84 60.88

| (E) | (F) | (G) | (H) |
|---|---|--|------------------------|
| Technical person-hours per year (E=CxD) | Management person-hours per year (F=Ex0.05) | Clerical person-hours per year (G=Ex0.1) | Cost (\$) ^b |
| | | | |
| | | | |
| | | | |
| 64 | 3.2 | 6.4 | \$8,719.36 |
| | | | |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| | | | |
| | | | |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 3,200 | 160 | 320 | \$435,968.00 |
| 128 | 6.4 | 12.8 | \$17,438.72 |
| 3,901 | | | \$462,126 |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| 1,460 | 73 | 146 | \$198,910.40 |
| 832 | 41.6 | 83.2 | \$113,351.68 |
| | | | |
| | | | |
| 2,636 | | | \$312,262 |
| 6,540 | | | \$774,000 |
| | | | \$720,000 |
| | | | \$1,490,000 |

responses hr/response
80 82

ree-year period of this ICR.

labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, September 2020. The rates have l

been increased by 110 percent to account for overhead.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part

51.23

| Activity | (A) | (B) | (C) | (D) | (E) |
|---|---------------------------------|---------------------------------------|---|-----------------|---|
| | 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) |
| 1. Initial performance test ^c | 24 | 1 | 24 | 0 | 0 |
| 2. Repeat performance test ^d | 24 | 0.2 | 4.8 | 0 | 0 |
| 3. Report review | | | | | |
| Notification of construction/reconstruction | 1 | 1 | 1 | 0 | 0 |
| Notification of anticipated startup | 0.5 | 1 | 0.5 | 0 | 0 |
| Notification of actual startup | 0.5 | 1 | 0.5 | 0 | 0 |
| Notification of emission testing | 0.5 | 1 | 0.5 | 0 | 0 |
| Notification of physical or operational change ^e | 0.5 | 1 | 0.5 | 0 | 0 |
| Emission test report ^f | 24 | 1 | 24 | 0 | 0 |
| Application for waiver of testing ^g | 24 | 1 | 24 | 0 | 0 |
| Application for equivalency | 24 | 1 | 24 | 0 | 0 |
| Initial report | 24 | 1 | 24 | 0 | 0 |
| Quarterly report ^h | 4 | 4 | 16 | 16 | 256 |
| MVV/RVD report ⁱ | 24 | 1 | 24 | 16 | 384 |
| TOTAL ANNUAL BURDEN (rounded) ^j | | | | | |

Assumptions:

- ^a We estimate there are 16 existing sources subject to the standard and no additional sources will become subject over
- ^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for govern
- ^c We have assumed that it will take twenty-four hours to complete the performance tests.
- ^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.
- ^e Assume that there will be no physical or operational changes over the next three years.
- ^f It is assumed that it will take twenty-four hours to review an emissions test report.
- ^g Assume that it will take twenty-four hours to review application for waiver of test.
- ^h We have assumed that it will take four hours to review the quarterly report.
- ⁱ We have assumed that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

t 61, Subpart F) (Renewal)

69.04 27.73

| (F) | (G) | (H) |
|--|---|-------------------------------|
| Management person-hours per year (F=Ex0.05) | Clerical person-hours per year (G=Ex0.1) | Cost (\$) ^b |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 0 | 0 | \$0 |
| 12.8 | 25.6 | \$14,708.48 |
| 19.2 | 38.4 | \$22,062.72 |
| 736 | | \$36,800 |

the three-year period of this ICR.

ment overhead expenses: \$69.04 for Managerial (GS-13, Step 5, \$43.15 x 1.6), \$51.23 for Technical (GS-12, Step 1

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 Managen

ment (OPM) 2021 General Schedule which excludes locality rates of pay.