

Information Collection Request (ICR) Workbook for
National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane
Foam Fabrication Operations (40 CFR Part 63, Subpart M)

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the
Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review (Amendments) – Years 1–3

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the
Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review (Amendments)

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the
Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review (Amendments) – Years 1–3

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the
Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review (Amendments)

TABLE 9

Annual Respondent Operation and Maintenance (O&M) Cost of Recordkeeping and Reporting Requirements for the
Flexible Polyurethane Foam Fabrication Operations NESHAP Residual Risk and Technology Review (Amendments)

Respondent Wages (\$2019)		
Category (1)	Hourly Mean Wage (2)	Loaded Wage (3)
Technical	\$50.64	\$106.35
Managerial	\$65.58	\$137.72
Clerical	\$20.45	\$42.95

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics and Rubber Products 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 the benefit packages available to those employed by private industry.

EPA Wages (\$2019)		
Category (1)	Hourly Mean Wage (2)	Wage With Fringe & Overhead (3)
(GS- 12, step 1) - Technical	\$30.90	\$49.44
(GS- 13, step 5) - Managerial	\$41.64	\$66.63
(GS-6, step 3) - Clerical	\$16.72	\$26.76

Footnotes:

(1) The hourly mean wage for each category is based on 2019 wages, and are found here:
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/GS>

(2) This value differs from the wages used in the 2019 ICR amendments, which were based on 2018 rates of pay

(3) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

Table 1 : Annual Respondent Burden and Cost Year One – Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Burden item	Person-hours per Occurrence	Non-Labor Costs per Occurrence ^a	No. of Occurrences per Respondent per Year	Person-hours per Respondent per Year (D=AxC)	Number of Respondents per Year ^b	Total Number of Responses per Year (F=CxE)	Technical Person - hours per year (G=DxE)	Management person-hours per year (H=Gx0.05)	Clerical person - hours per year (I=Gx0.1)	Total Labor Hours per Year (J=G+H+I)	Total Non-Labor Costs per Year (K=BxCxE)	Total Labor Cost per Year, \$ ^c
1. Applications	N/A											
2. Surveys and studies	N/A											
3. Familiarize with regulatory requirements	4		1	4	3	3	12	0.6	1.2	13.8	\$0	\$1,410
4. Required activities for flame lamination sources												
a. Initial performance test and report	4	\$15,200	1	4	2	2	8	0.4	0.8	9.2	\$30,400	\$940
b. Establish operating parameters	N/A											
c. Periodic performance test and report	2	\$12,000	1	2	0	0	0	0	0	0	\$0	\$0
5. Required activities for sources using pollution prevention measures												
a. Develop recordkeeping system	See 10.a.											
b. Enter information into recordkeeping system	See 10.c.											
c. Work practice requirements	N/A											
6. Create information	See 10.c.											
7. Gather information	See 10.c.											
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	2	2	2	4	0.2	0.4	4.6	\$0	\$470
f. Notification of compliance status	20		1	20	3	3	60	3	6	69	\$0	\$7,052
9. Reporting requirements												
a. Semiannual compliance reports for all sources ^d	8		2	16	3	6	48	2.4	4.8	55.2	\$0	\$5,641
b. Additional reports for sources with add-on control devices	N/A											
Subtotal for Reporting Requirements						16	132	6.6	13.2	152	\$30,400	\$15,514
10. Recordkeeping requirements												
a. Familiarize with CEDRI and CDX registration	4		1	4	3	3	12	0.6	1.2	13.8	\$0	\$1,410
b. Plan and develop record system	See 10.a.											
c. Record information	6		1	6	3	3	18	0.9	1.8	20.7	\$0	\$2,116
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						6	30	2	3	35	\$0	\$3,526
TOTAL LABOR BURDEN AND COST							162	8	16	186		\$19,040
Capital and O&M Cost											\$30,400	
GRAND TOTAL (rounded) ^e						22					\$30,400	\$19,000

2019 ICR Wages	
Technical	\$106.35
Managerial	\$137.72
Clerical	\$42.95

^a We assume that performance test-related work will be contracted out, resulting in a non-labor cost. See table 9 for derivation of non-labor cost estimate.

^b We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be no additional sources over the three-year period of this ICR.

^c The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics and Rubber Products Manufacturing," accessed December 1, 2020 and found here: https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

Table 2 : Annual Respondent Burden and Cost Year Two – Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Burden item	Person-hours per Occurrence	Non-Labor Costs per Occurrence ^a	No. of Occurrences per Respondent per Year	Person-hours per Respondent per Year (D=AxC)	Number of Respondents per Year ^b	Total Number of Responses per Year (F=CxE)	Technical Person - hours per year (G=DxE)	Management person-hours per year (H=Gx0.05)	Clerical person - hours per year (I=Gx0.1)	Total Labor Hours per Year (J=G+H+I)	Total Non-Labor Costs per Year (K=BxCxE)	Total Labor Cost per Year, \$ ^c
1. Applications	N/A											
2. Surveys and studies	N/A											
3. Familiarize with regulatory requirements	4		1	4	0	0	0	0	0	0	\$0	\$0
4. Required activities for flame lamination sources												
a. Initial performance test and report	4	\$15,200	1	4	0	0	0	0	0	0	\$0	\$0
b. Establish operating parameters	N/A											
c. Periodic performance test and report	2	\$12,000	1	2	0	0	0	0	0	0	\$0	\$0
5. Required activities for sources using pollution prevention measures												
a. Develop recordkeeping system	See 10.a.											
b. Enter information into recordkeeping system	See 10.c.											
c. Work practice requirements	N/A											
6. Create information	See 10.c.											
7. Gather information	See 10.c.											
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	2	0	0	0	0	0	0	\$0	\$0
f. Notification of compliance status	20		1	20	0	0	0	0	0	0	\$0	\$0
9. Reporting requirements												
a. Semiannual compliance reports for all sources ^d	8		2	16	3	6	48	2.4	4.8	55.2	\$0	\$5,641
b. Additional reports for sources with add-on control devices	N/A											
Subtotal for Reporting Requirements						6	48	2.4	4.8	55	\$0	\$5,641
10. Recordkeeping requirements												
a. Familiarize with CEDRI and CDX registration	4		1	4	0	0	0	0	0	0	\$0	\$0
b. Plan and develop record system	See 10.a.											
c. Record information	6		1	6	3	3	18	0.9	1.8	20.7	\$0	\$2,116
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						3	18	1	2	21	\$0	\$2,116
TOTAL LABOR BURDEN AND COST							66	3	7	76	\$0	\$7,757
Capital and O&M Cost												\$0
GRAND TOTAL (rounded) ^e						9					\$0	\$7,760

2019 ICR Wages	
Technical	\$106.35
Managerial	\$137.72
Clerical	\$42.95

Assumptions:

^a We assume that performance test-related work will be contracted out, resulting in a non-labor cost. See table 9 for derivation of non-labor cost estimate.

^b We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be no additional sources over the three-year period of this ICR.

^c The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics and Rubber Products Manufacturing," accessed December 1, 2020 and found here: https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

Table 3 : Annual Respondent Burden and Cost Year Three – Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Burden item	Person-hours per Occurrence	Non-Labor Costs per Occurrence ^a	No. of Occurrences per Respondent per Year	Person-hours per Respondent per Year (D=AxC)	Number of Respondents per Year ^b	Total Number of Responses per Year (F=CxE)	Technical Person - hours per year (G=DxE)	Management person-hours per year (H=Gx0.05)	Clerical person - hours per year (I=Gx0.1)	Total Labor Hours per Year (J=G+H+I)	Total Non-Labor Costs per Year (K=BxCxE)	Total Labor Cost per Year, \$ ^c
1. Applications	N/A											
2. Surveys and studies	N/A											
3. Familiarize with regulatory requirements	4		1	4	0	0	0	0	0	0	\$0	\$0
4. Required activities for flame lamination sources												
a. Initial performance test and report	4	\$15,200	1	4	0	0	0	0	0	0	\$0	\$0
b. Establish operating parameters	N/A											
c. Periodic performance test and report	2	\$12,000	1	2	0	0	0	0	0	0	\$0	\$0
5. Required activities for sources using pollution prevention measures												
a. Develop recordkeeping system	See 10.a.											
b. Enter information into recordkeeping system	See 10.c.											
c. Work practice requirements	N/A											
6. Create information	See 10.c.											
7. Gather information	See 10.c.											
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	2	0	0	0	0	0	0	\$0	\$0
f. Notification of compliance status	20		1	20	0	0	0	0	0	0	\$0	\$0
9. Reporting requirements												
a. Semiannual compliance reports for all sources ^d	8		2	16	3	6	48	2.4	4.8	55.2	\$0	\$5,641
b. Additional reports for sources with add-on control devices	N/A											
Subtotal for Reporting Requirements						6	48	2.4	4.8	55	\$0	\$5,641
10. Recordkeeping requirements												
a. Familiarize with CEDRI and CDX registration	4		1	4	0	0	0	0	0	0	\$0	\$0
b. Plan and develop record system	See 10.a.											
c. Record information	6		1	6	3	3	18	0.9	1.8	20.7	\$0	\$2,116
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						3	18	1	2	21	\$0	\$2,116
TOTAL LABOR BURDEN AND COST							66	3	7	76	\$0	\$7,757
Capital and O&M Cost											\$0	
GRAND TOTAL (rounded) ^e						9					\$0	\$7,760

2019 ICR Wages	
Technical	\$106.35
Managerial	\$137.72
Clerical	\$42.95

^a We assume that performance test-related work will be contracted out, resulting in a non-labor cost. See table 9 for derivation of non-labor cost estimate.

^b We have assumed that the average number of respondents that will be subject to the rule will be 3 existing sources. There will be no additional sources over the three-year period of this ICR.

^c The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2019 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326000 - Plastics and Rubber Products Manufacturing," accessed December 1, 2020 and found here: https://www.bls.gov/oes/current/naics3_326000.htm. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Cost	Non-Labor (Capital/Startup and O&M) Cost	Total Cost ^a
1	162	8	16	186	\$19,040	\$30,400	\$49,400
2	66	3	7	76	\$7,757	\$0	\$7,760
3	66	3	7	76	\$7,757	\$0	\$7,760
Total ^a	294	15	29	338	\$34,600	\$30,400	\$64,900
Average ^b	98	5	10	113	\$11,500	\$10,100	\$21,600

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response	Hours per Respondent-Response
1	3	22	152	35	186	8	3
2	3	9	55	21	76	8	3
3	3	9	55	21	76	8	3
Total	9	40	262	76	338	25	8
Average	3	13	87	25	113	8	3

Notes:

a Total costs have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

b Average costs have been rounded to 3 significant figures.

Table 5: Average Annual EPA Burden and Cost Year One – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year	(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
1. Read instructions	N/A							
2. Enter and update information into agency recordkeeping system ^c	4	1	4	3	12	0.6	1.2	\$665
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	4	2	8	0.4	0.8	\$444
f. Review compliance status ^f	2	1	2	3	6	0.3	0.6	\$333
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	8	3	24	1.2	2.4	\$1,331
TOTAL LABOR BURDEN AND COST (rounded)^h					50	2.5	5	\$2,770

2019 ICR Wages	
Technical	\$49.44
Managerial	\$66.63
Clerical	\$26.76

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule,” which excludes locality rates of pay.

^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

Table 6: Average Annual EPA Burden and Cost Year Two – NESHP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year	(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
1. Read instructions	N/A							
2. Enter and update information into agency recordkeeping system ^c	4	1	4	3	12	0.6	1.2	\$665
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	2	3	6	0.3	0.6	\$333
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	8	3	24	1.2	2.4	\$1,331
TOTAL LABOR BURDEN AND COST (rounded)^h					42	2.1	4.2	\$2,330

2019 ICR Wages	
Technical	\$49.44
Managerial	\$66.63
Clerical	\$26.76

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule,” which excludes locality rates of pay.

^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

Table 7: Average Annual EPA Burden and Cost Year Three – NESHAP for Flexible Polyurethane Foam Fabrication (40 CFR Part 63, Subpart M) (Amendments)

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year	(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
1. Read instructions	N/A							
2. Enter and update information into agency recordkeeping system ^c	4	1	4	3	12	0.6	1.2	\$665
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	2	3	6	0.3	0.6	\$333
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	8	3	24	1.2	2.4	\$1,331
TOTAL LABOR BURDEN AND COST (rounded)^h					42	2.1	4.2	\$2,330

2019 ICR Wages	
Technical	\$49.44
Managerial	\$66.63
Clerical	\$26.76

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.63 Managerial rate, \$49.44 Technical rate, and \$26.76 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2019 General Schedule,” which excludes locality rates of pay.

^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

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Cost	Non-Labor Costs	Total Cost
1	50	3	5	58	\$2,770	\$0	\$2,770
2	42	2	4	48	\$2,330	\$0	\$2,330
3	42	2	4	48	\$2,330	\$0	\$2,330
Total ^a	134	7	13	154	\$7,430	\$0	\$7,430
Average ^b	45	2	4	51	\$2,480	\$0	\$2,480

Notes:

a Total costs have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

b Average costs have been rounded to 3 significant figures.

Table 9 - Annual Respondent Operation and Maintenance (O&M) Cost of Recordkeeping and Reporting Requirements for the Flexible Polyurethane Foam Fabrication NESHAP (40 CFR Part 63, Subpart M) (Amendments)

(A) Testing	(B) Cost per Line Tested	(C) Number of Lines Tested per Occurrence	(D) Cost per Occurrence (D=BxC)	(E) Number of Respondents Over 3-Year Period	(F) Total Cost (F=DxE)	Footnotes
Initial Performance Test						
Method 26A	\$7,600	2	\$15,200	2	\$30,400	a, b
Periodic Performance Test						
Method 26A	\$6,000	2	\$12,000	0	\$0	c, d
Total					\$30,400	

Footnotes:

- a The new rule requires all existing flame lamination facilities (2 facilities) to conduct initial performance tests within the first year of the promulgated amendments. No new facilities are expected to commence operation within the 3 years covered by this ICR.
- b The installation of equipment (e.g., ductwork) is a one-time expense estimated at \$3,200 per facility.
- c The new rule requires all existing flame lamination facilities (2 facilities) to conduct periodic performance tests no less frequently than every 5 years.
- d Because all existing flame lamination facilities will have conducted the initial performance test in year 1 of this ICR, no existing facilities are expected to conduct the periodic (non-initial) performance test within the 3 years covered by this ICR.