

**Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Fle:
(Renewal)**

Burden Item	A	B
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year
1. Applications	N/A	N/A
2. Survey and studies	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A
4. Reporting Requirements		
A. Familiarization with instructions	1	1
B. Required Activities		
Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12
C. Create Information	Included in 4B and 5E	
D. Gather Existing Information	Included in 4B and 5E	
E. Write Report		
Initial notification ^d	2	1
Notification of modification/reconstruction ^d	2	1
Notification of Special Compliance Requirements ^e	2	1
Pre-compliance Report ^d	4	1
Notification of Compliance Status ^d	16	1
Semiannual Reports ^f	4	2
Annual Compliance Certifications ^g	2	1
Subtotal for Reporting Requirements	34	21
5. Recordkeeping Requirements		
A. Familiarization with instructions	Included in 4A	
B. Plan activities	Included in 4B	
C. Implement activities	Included in 4B	
D. Develop record system	40	1
E. Time to enter information: records of monitoring and operations ^a		
Slabstock producers	8	12
Molded/rebond facilities	4	1
F. Train personnel	40	1
G. Audits	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15
TOTAL LABOR BURDEN AND COSTS (rounded) ^h		
TOTAL CAPITAL AND O&M COST (rounded) ^h		
GRAND TOTAL (rounded) ^h		

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam average number of respondents per year for this ICR is estimated to be 12 and 11 of these facilities are private se

^b This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110%). Source: U.S. Department of Labor, Bureau of Labor Statistics, March 2021, "Table 2. Civilian Workers, by occupational and industry, by sex, race, and Hispanic or Latino ethnicity, by hours worked, by month, 2018-2020." Managerial and Clerical hours are 10 percent of Technical hours.

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements and no reconstruction is needed.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the rule does not apply to them.

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III)

Note to OAQPS: Previous IC

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 (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Total Costs Per Year (\$) ^b
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
1	11	11	0.55	1.1	\$1,496.31
12	6	72	3.6	7.2	\$9,794.05
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
16	0	0	0	0	\$0
8	6	48	2.4	4.8	\$6,529.37
2	11	22	1.1	2.2	\$2,992.63
49			176		\$20,812
40	0	0	0	0	\$0
96	6	576	28.8	57.6	\$78,352.42
4	5	20	1	2	\$2,720.57
40	0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A	N/A
180			685		\$81,073
			861		\$101,900
					\$0
					\$101,900

Labor Rates	
Management	\$153.55
Technical	\$122.20
Clerical	\$61.51

and foam producers for a total of 12 existing foam producers (i.e., respondents) that are commencing operations over the period of this ICR. Therefore, the total number of facilities.

0%); and Clerical \$61.51 (\$29.29 + 110%). These rates are from the United States industry group.” The rates are from column 1, “Total compensation.” The rates industry. This ICR assumes that Managerial hours are 5 percent of Technical hours,

tions will occur during this ICR renewal period.

compliance date for this rule has passed.

Rs indicated that at least one facility is owned by the federal government. This was confirmed by reviewing the 2014 RTR faci

lity list. The burden has been separated into into two tables to account for private labor rates for 11 facilities (mix of slabstock a

nd molded/rebond sources), and federal labor rates for the 1 facility, which appears to be a molded/rebond source.

Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Flex Subpart III) (Renewal)

Burden Item	A	B	C
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Person Hours Per Respondent Per Year (C=AxB)
1. Applications	N/A	N/A	N/A
2. Survey and studies	N/A	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A	N/A
4. Reporting Requirements			
A. Familiarization with instructions	1	1	1
B. Required Activities			
Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12	12
C. Create Information	Included in 4B and 5E		
D. Gather Existing Information	Included in 4B and 5E		
E. Write Report			
Initial notification ^d	2	1	2
Notification of modification/reconstruction ^d	2	1	2
Notification of Special Compliance Requirements ^e	2	1	2
Pre-compliance Report ^d	4	1	4
Notification of Compliance Status ^d	16	1	16
Semiannual Reports ^f	4	2	8
Annual Compliance Certifications ^g	2	1	2
Subtotal for Reporting Requirements	34	21	49
5. Recordkeeping Requirements			
A. Familiarization with instructions	Included in 4A		
B. Plan activities	Included in 4B		
C. Implement activities	Included in 4B		
D. Develop record system	40	1	40
E. Time to enter information: records of monitoring and operations ^a			
Slabstock producers	8	12	96
Molded/rebond facilities	4	1	4
F. Train personnel	40	1	40
G. Audits	N/A	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15	180
TOTAL LABOR BURDEN and COSTS (rounded) ^h			
TOTAL CAPITAL AND O&M COST (rounded) ^h			
GRAND TOTAL (rounded) ^h			

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there w period of this ICR. Therefore, the average number of respondents per year for this ICR is estimated to be 12 and 1 facility is assumed to be a molded/rebond source.

^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%) \$27.73 (GS-6, Step 3, \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, as from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality, rates of pay, and benefit packages available to government employees.

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the cost

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

ible Polyurethane Foam Product (40 CFR Part 63,

Note to OAQPS: Previous ICRs indicated th

D	E	F	G	H
Respondents Per Year ^a	Technical Person-Hours Per Year (E=CxD)	Managemen t Person Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Total Costs Per Year (\$) ^b
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
1	1	0.05	0.1	\$57.46
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
1	2	0.1	0.2	\$114.91
		3		\$172
0	0	0	0	\$0
0	0	0	0	\$0
1	4	0.2	0.4	\$229.82
0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A
		5		\$230
		8		\$400
				\$0
				\$400

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

1 foam producers for a total of 12 existing foam producers (i.e., will be no new foam producers commencing operations over the of these facilities is a federal government facility. This federal

; Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical
and Clerical hours are 10 percent of Technical hours. These rates are
The rates have been increased by 60 percent to account for the

compliance date for this rule has passed.

at at least one facility is owned by the federal government. This was confirmed by reviewing the 2014 RTR facility list. The bu

Order has been separated into into two tables to account for private labor rates for 11 facilities (mix of slabstock and molded/reb

and sources), and federal labor rates for the 1 facility, which appears to be a molded/rebond source.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – (40 CFR Part 63, Subpart III) (Renewal)

Affected Sector	Number of Responses	Labor Hours	
		Reporting	Recordkeeping
Private	23	176	685
Public (Federal)	1	3	5
Total (rounded)	24	179	690

NESHAP for Flexible Polyurethane Foam Product

	Labor Cost	Capital and O&M Cost
Total		
861	\$101,900	\$0
8	\$400	\$0
869	\$102,000	\$0

36 hrs/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foams (Renewal)

Burden Item	A	B	C	D
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)	Plants Per Year ^a
Initial Notification ^c	2	0	0	0
Notification of Reconstruction/Modification ^c	2	1	2	0
Pre-compliance Report ^c	2	1	2	0
Notification of Special Compliance Requirements ^d	2	1	2	0
Notification of Compliance Status ^c	2	1	2	0
Semiannual Reports ^e	2	2	4	6
Annual Compliance Certifications ^f	2	1	2	12
TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers. The average number of respondents per year for this ICR is estimated to be 12.

^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%); Technical \$33.33, \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. Management (OPM), 2021 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent for employees.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance data is not available.

^e Only slabstock foam producers are required to submit semiannual reports.

^f All respondents are required to submit annual compliance certifications.

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

am Product (40 CFR Part 63, Subpart III)

E	F	G	H
Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Total Cost Per Year (\$) ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
24	1.2	2.4	\$1,378.92
24	1.2	2.4	\$1,378.92
55			\$2,760

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

icers for a total of 12 existing foam producers (i.e., respondents) that commencing operations over the period of this ICR. Therefore, the

51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical \$27.73 (GS-6, Step of Technical hours. These rates are from the Office of Personnel nt to account for the benefit packages available to government

ite for this rule has passed.