

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal), EPA ICR Number 2432.06, OMB Control Number 2060-0666.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) were proposed on May 20, 2011; and promulgated on April 17, 2012. These regulations apply to existing facilities and new PVC production facilities. Area source PVC facilities are subject to 40 CFR Part 63, Subpart DDDDDD and are not covered in this ICR. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHHHHH.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 the NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" includes existing and new PVC and copolymer production major

facilities. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal). There are approximately 13 PVC production facilities, which are owned and operated by the PVC production industry. None of the 13 facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

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 13 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, hazardous air pollutant (HAP) emissions from PVC and copolymer production major source facilities 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 6, Subpart HHHHHHHH.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the 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 semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of change in information already provided required in 40 CFR 63.9(j), and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 63, Subpart HHHHHHHH performance test reports be submitted through the EPA's ERT.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart

HHHHHHH.

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 either the delegated state or local agency. If a state or local agency has adopted its own 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 19256) on April 13, 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 13 respondents will be subject to these standards over the three-year period covered by this ICR.

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 that these same 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 Formosa Plastics, at 888-664-4040. The VI provided comments on the number of respondents, indicating closure of the Wacker - Calvert City facility, and stated that there are no new sources being constructed as EPA re-evaluates the current standards. This ICR subsequently adjusts the total number of facilities downward. Although the previous ICR considered the Formosa - Point Comfort operations to be two facilities, this ICR more

appropriately considers these operations as a single respondent, due to shared equipment, controls, and/or employees. Therefore, instead of 14 facilities as provided by VI, this ICR renewal considers there to be 13 major source facilities.

The VI suggested including capital costs for equipment replacements for PRDs, VC monitors, gasholders, and lab gas chromatographs (GC) at existing sources. Because capital costs are typically associated with new facilities, and no new facilities are expected during the 3-year period covered by this ICR renewal, we have not included capital costs in the burden estimate for this ICR renewal.

The VI suggested an increase to the operation and maintenance (O&M) costs for resin sampling and monitoring to account for two lab GCs per facility. We do not expect it to be necessary for a facility to maintain two GCs in order to demonstrate continuous compliance with the rule; therefore, we have not increased this O&M cost.

The VI suggested an increase in O&M costs for stripped resin: Non-VC TOHAP testing, noting the use of outside contract lab services. Although a facility may choose to use contractor support, it is not required by the rule or considered to be necessary. Therefore, we have not increased this O&M cost.

The VI suggested an increase to the O&M cost for non-vinyl chloride total HAP testing of wastewater. VI suggested to increase the cost to analyze samples from \$650 per sample to \$1500 per sample. However, the test method options are the same as those used for stripped resin testing, where the cost remains unchanged at \$650 per sample. We assume that \$650 per sample is still reasonable for wastewater samples. Additionally, VI suggested an increase to this cost to allow for two samples per month. However, Table 9 to Subpart HHHHHHH of Part 63— Procedures for Conducting Sampling of Stripped Resin and Process Wastewater only requires one grab sample per month to demonstrate continuous compliance with the rule. Therefore, we have not increased the cost to account for two samples per month.

The VI suggested an increase of the O&M cost for uncontrolled wastewater sampling, based on five wastewater streams and two cooling water streams sampled per facility (7 streams total) and duplicate samples. While we adjusted the cost to account for 7 streams per facility as noted in section 6(b)iii below, we have not increased the cost to account for duplicate samples. Duplicate samples are not required in order to show continuous compliance with the rule.

The VI suggested increasing the respondent hours per occurrence for familiarization with rule requirements for existing sources from 8 hours to 320 hours. Although we agree this cost is reasonable for new respondents, mainly because the rule requirements have not changed, we assume it will take 8 hours per existing respondent to read and understand the rule requirements. We assume minimal time is needed each year to refamiliarize with rule requirements and that new employees will need to familiarize themselves with rule requirements.

The VI suggested to increase the respondent hours per occurrence associated with periodic performance testing, sampling, and reporting for equipment leaks from 43 hours to 83 hours, noting the use of an outside contractor. The VI also suggested to increase the O&M cost for equipment leak testing based on some facilities “being sampled more frequently than others in order to meet more stringent LDAR requirements in 40 CFR Part 63, Subpart UU.” There have been no changes to the equipment leak monitoring requirements since the 2012 final rule. Because the rule requirements have not changed, we do not expect most facilities would require an outside contractor to meet rule requirements. Therefore, we have not increased the estimate of 43 respondent hours per occurrence. Further, we anticipate facilities with equipment components would reflect improved control of leaks over time. Therefore, we have not increased this O&M cost.

The VI provided an estimate of hours needed to perform annual audits. Audits are not required by 40 CFR 63, Subpart HHHHHHH; therefore, we did not include hours for audits in the burden estimate.

The VI suggested adding a burden estimate for pressure relief device (PRD) deviation reports as required by § 63.11985(c)(7). The VI provided an estimate of 4 hours to complete a PRD release report. We have not added an annual average burden for PRD deviation reports, because this is an occasional report and is not submitted at a regular frequency.

The VI commented that the burden for recordkeeping for “Other Emission Sources” as required by § 63.11990(j) does not appear to be reflected and provided an estimate of 1 hour for the compliance report and 1 hour to enter the information for recordkeeping purposes for a total of 2 hours. We have not added hours for this requirement, because we expect the 10 hours estimated for records of other emission sources requirements, already included in the burden estimate, is sufficient for recordkeeping for all other emission sources.

The VI provided additional adjustments to the capital and operation and maintenance costs, monitoring, and recordkeeping, which we have incorporated where noted in this document.

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.

These standards require the respondents to maintain all records, including reports and notifications, for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

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 PVC and copolymer production major source facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) code are listed in the table below:

Standard (40 CFR Part 63, Subpart HHHHHHH)	SIC Codes	NAICS Codes
Plastics Material and Resin Manufacturing	2821	325211

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHHH).

A source must make the following reports:

Notifications	
Notification of performance test with test plan	§ 63.9(e)
Notification of compliance status	§ 63.11985(a)
Notice of Inspection	§ 63.11985(c)(1)
Initial notification and notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Compliance report	§ 63.11985(b)
Batch pre-compliance report	§ 63.11985(c)(2)
Pressure relief device deviation report	§ 63.11985(c)(7)
Performance test reports (electronic submission)	§ 63.11985(c)(9)

A source must keep the following records:

Recordkeeping	
A copy of each notification and report submitted to comply with this subpart	§ 63.11990(a)
Records of storage vessels	§ 63.11990(b)
Records of equipment leaks	§ 63.11990(c)
Records of heat exchanger systems	§ 63.11990(d)
Records of process vents	§§ 63.11990(e) and (f)
Records of closed vent systems	§ 63.11930(g) and § 63.11990(g)

Recordkeeping	
Records of resin strippers	§ 63.11990(h)
Records of process wastewater	§ 63.11990(i)
Records of other emissions	§ 63.11990(j)
Keep records for five years	§ 63.11995(a)

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.

The rule was amended to include electronic reporting provisions on April 17, 2012. Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA’s CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C, 2D, 2F, or 2G; 3, 3A,

Respondent Activities
or 3B; 4; 18; 23; 25A; 26; 26A; 301, 320 and ASTM D6348-03; and 18 and ASTM D6420-99 for process vents; and Reference Method 107, SW-846-8015C, SW-846-8015A, SW-846-8270D, and SW-846-8260B test for resin and process wastewater, 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.
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:

Agency Activities
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 the 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 semiannual 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 five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 318,000 hours (see 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	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 standard(s) 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 regulation. 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
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	Total O&M, (E X F)
Continuous Parameter Monitoring						
PRD Electronic Monitor ⁸	\$375,000	0	\$0	\$26,897	13	\$349,661
VC Ambient monitoring ⁹				\$207,692	13	\$2,700,000
Gas holders	\$5,000	0	\$0			
Periodic Testing						
Process Vent Testing ¹⁰	\$51,198	0	\$0	\$99,080	32	\$3,170,560
Resin Sampling and Monitoring ¹	\$1,803	0	\$0	\$7,200	13	\$93,600
Stripped resin: Non-VC TOHAP testing ²	\$1,950	0	\$0	\$23,400	13	\$304,200
Wastewater Testing ³	\$491	0	\$0	\$5,892	13	\$76,596
Wastewater: Non-VC TOHAP testing ⁴	\$650	0	\$0	\$7,800	13	\$101,400
Uncontrolled Wastewater testing ⁵	\$0	0	\$0	\$3,437	13	\$44,681
Uncontrolled wastewater: Non-VC TOHAP testing ⁶	\$3,250	0	\$0	\$4,550	13	\$59,150
Equipment Leak Testing ⁷	\$77,798	0	\$0	\$18,205	13	\$236,665
Total						
			\$0			\$7,140,000

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

¹Per VI's comments, monthly maintenance and service of a lab GC costs \$600 per unit.

²Per VI's previous comments, the costs of Non-VC TOHAP testing is \$650 per sample, and 3 resin samples per facility.

³Monthly testing (\$491 x 12 months = \$5,892 per year)

⁴Per VI's previous comments, the costs of Non-VC TOHAP testing is \$650 per sample, and one sample per facility.

⁵Per VI's comments, there are 5 uncontrolled wastewater streams and 2 cooling tower streams per source sampled annually. Using a cost of \$491 per sample x 7 samples = \$3,437

⁶The costs of Non-VC TOHAP testing is assumed to be \$650 per sample. Per VI's comments there are 5 uncontrolled wastewater streams and 2 cooling water streams per source sampled annually. \$650 x 7 = \$4,550

⁷13 facilities maintain LDAR programs to comply with 40 CFR 63, Subpart UU

⁸Per VI's comments, the cost of a PRD monitor is \$5,000 per device. It is assumed that 25 devices per facility require indicators which must be replaced. The total capital cost per facility is \$5,000 x 25 = \$125,000.

⁹Per VI's comments, there are approximately 60 GC monitors at the 13 major sources in the industry with an annual O&M cost of \$45,000 per monitor.

¹⁰Per VI's comments, the cost to test one thermal oxidizer in 2018 was \$99,080 and there are 32 thermal oxidizers in operation at 13 major source facilities

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 \$7,140,000. 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 \$7,140,000. 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. The 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 \$35,300.

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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 13 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 13 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(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)
1	0	13	0	0	13
2	0	13	0	0	13
3	0	13	0	0	13
Average					13

¹ 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 13.

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

Total Annual Responses					

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	0	1	0	0
Batch pre-compliance report	0	1	0	0
Notification of performance test with test plan	0	1	0	0
Notification of compliance status	0	1	0	0
Semiannual compliance report	13	2	0	26
Notice of Inspection	13	1	0	13
			Total	39

The number of Total Annual Responses is 39.

The total annual labor costs are 37,600,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 318,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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 8,154 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$7,140,000. 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 706 labor hours at a cost of \$35,300; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (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

The decrease in burden from the most-recently approved ICR is due to an adjustment(s). There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The adjustment decrease in burden from the most recently approved ICR is due to a decrease in the number of respondents. The most-recently approved ICR estimated 15 major source facilities. The Wacker - Calvert City facility has ceased PVC operations. Although the previous ICR considered the Formosa - Point Comfort operations to be two facilities, this ICR more appropriately considers these operations as a single respondent, due to shared equipment, controls, and/or employees. Therefore, this ICR renewal considers there to be 13 major source facilities. The adjustment decrease is also due to a correction to the number of hours needed for existing respondents to refamiliarize with rule requirements each year.

The adjustment decrease is offset somewhat by the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2021) to calculate respondent burden costs. The adjustment decrease is also offset by corrections to burden estimates for resin sampling, PRD electronic monitor review, gasholders, storage vessels, and ongoing inspections of bypasses and to the number of occurrences per year for recordkeeping requirements to more accurately reflect facility activities as shown in Table 1: Annual Respondent Burden and Cost – NESHAP for Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal).

There is an increase in the operation and maintenance (O&M) costs as calculated in section 6(b)(iii) compared with the costs in the previous ICR. Although the number of respondents with O&M decreased, corrections were made to the annual O&M costs for VC ambient monitoring, uncontrolled wastewater testing, and uncontrolled wastewater Non-VC TOHAP testing to more accurately reflect the number of monitors per facility and the number of

waste streams sampled per facility.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8,154 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-2021-0125. 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-2021-0125 and OMB Control Number 2060-0666 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondent s Per Year ^a	(E) Technical Hours Per Year (C x D)	(F) Managemen t Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Total Labor Costs Per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements ^{e,n}								
1) Existing respondents	8	1	8	13	104	5	10	\$14,147
2) New respondents	320	1	320	0	0	0	0	\$0
B. Required Activities								
1) Initial performance test, sampling, and report								
a) Process Vents ^{c,e}	120	1	120	0	0	0	0	\$0
b) Resins ^{c,g}	36	1	36	0	0	0	0	\$0
c) wastewater ^{c,h}	8	1	8	0	0	0	0	\$0
d) uncontrolled wastewater ^{c,h}	40	1	40	0	0	0	0	\$0
e) heat exchangers ^{c,i}	8	1	8	0	0	0	0	\$0
f) equipment leaks ^{c,j}	850	1	850	0	0	0	0	\$0
2) Periodic performance test, sampling, and report								
a) Process Vents ^f	17.1	350	5985	13	77,805	3,890	7,781	\$10,583,697.44

b) Resins ^g	36	362	13032	13	169,416	8,471	16,942	\$23,045,404
c) wastewater ^h	8	12	96	13	1,248	62	125	\$169,763.57
d) uncontrolled wastewater ^h	40	1	40	13	520	26	52	\$70,734.82
e) heat exchangers ⁱ	8	12	96	13	1,248	62	125	\$169,763.57
f) equipment leaks ^j	43	12	516	13	6,708	335	671	\$912,479.18
3) Establish operating parameters and monitoring plan								
a) Process Vents ^{c,d,e}	8	1	8	0	0	0	0	\$0
4) Continuous parameter monitoring								
^{c,ik} a) Initial capital costs (PRD Electronic Monitor)	524	1	524	0	0	0	0	\$0
b) Annualized PRD Electronic Monitor Review ^k	10	1	10	13	130	6.50	13.00	\$17,683.71
5) Other requirements								
a) equipment openings, initial measurement ^{c,o}	1.5	1	1.5	0	0	0	0	\$0
b) equipment openings, daily measurement ^o	1.5	350	525	13	6,825	341.25	682.5	\$928,395
c) gasholders ^p	1	1	1	12	12	0.6	1.2	\$1,632
d) storage vessels ^q	2	1	2	13	26	1.3	2.6	\$3,537
e) bypasses, initial requirement ^{c,r}	40	1	40	0	0	0	0	\$0
f) bypasses, ongoing inspection ^r	2	12	24	13	312	15.6	31.2	\$42,440.89
C. Create Information	Incl. in 3.B							
D. Gather Information	Incl. in 3.E							
E. Report Preparation								
1) Initial Notification ^{c,d}	5	1	5	0	0	0	0	\$0
2) Batch precompliance report ^{c,d}	5	1	5	0	0	0	0	\$0
3) Notification of performance test with test plan ^{c,d}	10	1	10	0	0	0	0	\$0
4) Notification of compliance status ^{c,d}	20	1	20	0	0	0	0	\$0
5) Compliance report ^{d,k}	40	2	80	13	1,040	52	104	\$141,469.64
6) Notice of inspection ^d	5	1	5	13	65	3	7	\$8,841.85
Subtotal for Reporting Requirements ^m						305,278		\$36,109,990

4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	Incl. in 3.A							
B. Implement Activities	N/A							
C. Develop Record System	N/A							
D. Record Information								
1) Records of process vent requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
2) Records of resin stripper requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
3) Records wastewater requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
4) Records of storage vessel requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
5) Records of equipment leak requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
6) Records of heat exchanger requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
7) Records of other emission sources requirements ^d	10	12	120	13	1,560	78	156	\$212,204.46
E. Personnel Training	Incl. in 3.B							
F. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						12,558		1,485,000
TOTAL LABOR BURDEN AND COSTS (rounded)^e						318,000		37,600,000
TOTAL CAPITAL AND O&M COST (rounded)^e								7,140,000
GRAND TOTAL (rounded)^e								44,700,000

FOOTNOTES

^aAssumes that, over the next three years, approximately 13 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

^bLabor rates are \$153.55 for managerial, \$122.20 for technical, and \$61.51 for clerical. These rates from the United States Department of Labor, Bureau of Labor Statistics, March 2021, "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.

^cOne-time only costs.

^dCost incurred by a facility regardless of the number of affected units at the plant. Per VI's comments, this is performed monthly. We have assumed 10 hours per month for each process listed.

^eThere are 13 major sources in the affected source category. The previous count of 15 major sources counted Formosa Point Comfort as two facilities; however, this ICR assumes this is a single facility due to shared equipment, controls, and/or employees. Additionally, the Vinyl Institute (VI) informed EPA that the Wacker Calvert city facility discontinued PVC operations. Therefore, the count of major source facilities is adjusted to 13.

^f13 major sources are expected to perform testing for process vents. OxyVinyls Pedricktown does not operate a process vent control, but rather sends process vent gas streams to

Mexichem Pedricktown for control. Per VI, it is assumed that performance testing for process vents will take 120 hours per occurrence initially. The initial compliance and operating procedure development for continuous compliance and will take 8 hours. The daily monitoring of parameters will take 5 min per record with 112 records a day across 32 devices in the industry. There are 3 area source and 13 major sources subject to this requirement. Therefore, the continuous/daily monitoring will take on avg 17.1 hr per facility per day over 350 day/yr.

⁹Per VI's previous comments, it is assumed that performance testing for resins will take 4 hours per sample for 9 samples per facility, initially and daily (350 days per year). Pursuant to 40 CFR 63.11960(d)(2), we have increased the number of occurrences from 350 to 362 to account for 12 monthly samples.

¹⁰Per VI, wastewater testing is estimated to take 4 hours per sample for 2 samples per facility. There are 13 wastewater streams for 13 major sources, yields 13/13 wastewater streams per major source that are sampled monthly. There are 5 uncontrolled wastewater streams per source that are sampled annually. See Capital/O&M costs for non-VC TOHAP samples.

¹¹Per VI, it is assumed that performance testing on heat exchangers will take 4 hours per sample for 2 samples per facility, initially and monthly, for 16 of the 17 major sources. One of the sources relies on another facility to cool the water.

¹²For Equipment leaks, VI estimates approx 10,000 components per facility and 5 minutes per component, plus additional time calibration of analytical device for a total of 850 hr per facility. For continuous monitoring, we assume 1 hr is required per component for leak repair, if detected. It was assumed that overall continuous compliance of leak monitoring will take 5% of the time with initial monitoring per month.

¹³The Annualized PRD Electronic Monitor Review hours have been updated to include hours for corrective action for discharges and hours for replacement analysis. Per VI's comments, corrective action for discharge from a PRD would take 24 hours, and less than one PRD discharge event occurs per year in the entire industry. The number of hours for a discharge event is estimated to be $24/13 = 1.8$ (rounded to 2) hours per facility. Per VI's comments, analysis for replacement of PRD monitors is estimated to take 24 hours per facility. Because the lifetime of a PRD monitor is expected to be 7 years, we do not expect the replacement analysis to occur annually, and we have assumed that this occurs once every 3 years ($24 \text{ hrs}/3 \text{ years} = 8 \text{ hours per year}$).

¹⁴Per VI, Estimated that semiannual compliance reports would take 40 technical hours twice per year.

¹⁵Reporting subtotal does not include capital costs for PRD monitoring system.

¹⁶Because the rule requirements have not changed for existing respondents, we assume it will take 8 hours per respondent to read and understand the rule requirements (1 hr for 8 employees). We assume minimal time is needed each year to refamiliarize with rule requirements for existing employees. We assume that new employees will need 320 hours to familiarize with rule requirements (40 hours for 8 employees).

¹⁷For Equipment openings, Per VI, 1.5 hr to obtain measurement, initially, daily.

¹⁸Per VI's previous comments, this will require 24 hrs to evaluate compliance options, order materials, monitor installation, and developing O&M procedures. Note: there are only 13 gas holders in the industry among major & area sources (12 at major sources and 1 at an area source). This is assumed to be a one-time cost. Per VI's comments, facilities are performing this annually. We have assumed that annual updates to compliance options, order materials, monitor installation, and O&M procedures will require 5% of the time that was needed to meet the initial requirements.

¹⁹Per VI's previous comments, 40 hrs per facility to develop initial and ongoing compliance, inspection, and maintenance plans and procedures. This is assumed to be a one-time cost. Per VI's comments, facilities are performing this annually. We have assumed that annual updates will require 5% of the time that was needed to meet the initial requirements.

²⁰Per VI, 40 hrs per facility for training, development, and implementation; and it will take 2 hrs per month to inspect car seals per facility.

²¹Totals 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Renewal)

	(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 ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.10)	(H) EPA Cost Per Year ^b
1. Applications	not applicable							
2. Familiarization with Rule Requirements	15	1	15	0	0	0	0	\$0
3. Required Activities								
A. Observe initial performance tests ^c	48	1	48	0	0	0	0	\$0
B. Excess emissions – Enforcement Activities ^d	24	1	24	1.3	31	2	3	\$1,792.60
C. Create Information	not applicable							
D. Gather Information	not applicable							
E. Report Reviews								
1) Review initial notification	3	1	3	0	0	0	0	\$0
2) Review batch precompliance report	5	1	5	0	0	0	0	\$0
3) Review notification of performance test	10	1	10	0	0	0	0	\$0
4) Review notification of compliance status	40	1	40	0	0	0	0	\$0
5) Review compliance report	20	2	40	13	520	26	52	\$29,876.60
6) Review notice of inspection	3	1	3	13	39	2	4	\$2,240.75
F. Prepare annual summary report ^e	4	1	4	6	24	1	2	\$1,378.92
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =						n/a	per trip	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)^f					706			\$35,300

FOOTNOTES

^aAssumes that, over the next three years, approximately 13 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

^bLabor rates are \$69.04 for managerial (GS-13, Step 5, \$43.15 + 60%), \$51.23 for technical (GS-12, Step 1, \$32.02 + 60%), and \$27.73 for clerical (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 government employees.

^cAssumes EPA personnel attend 20 percent of the initial process vent stack tests.

^dAssume 10% of major source facilities (13) have emission exceedances.

^eUsing four hours per state (6 states) to write annual summary report.

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