SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal), EPA ICR Number 2410.05, OMB Control Number 2060-0665.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins (40 CFR Part 63, Subpart U) were proposed on June 12, 1995; promulgated on September 5, 1996; and amended on: June 19, 2000; July 16, 2001; December 16, 2008; and April 21, 2011. These regulations apply to both existing and new elastomer product process units (EPPU) and to associated equipment, including waste management units, maintenance wastewater, heat exchange systems, and equipment required either by or utilized to comply with this Subpart located at facilities that are major sources of hazardous air pollutants (HAPs) and are classified in the Group I Polymers and Resins source category. The Group I Polymers and Resins source category includes the following categories: Butyl Rubber Production, Epichlorohydrin Elastomers Production, Ethylene Propylene Rubber Production, Hypalon Production, Neoprene Production, Nitrile Butadiene Rubber (NBR) Production, Polybutadiene Rubber Production, Polysulfide Rubber Production, and Styrene Butadiene Rubber and Latex Production. New facilities include those that commenced either construction, or reconstruction, after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart U.

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 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 either the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the either delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA’s 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 “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (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 Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal). There are approximately 19 EPPU facilities, which are owned and operated by the Group I Polymers and Resins industry. None of the 19 facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by the Group I Polymers and Resins industry. Again, none of these facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of 1 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 19 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 either 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, HAP emissions from EPPU and associated equipment located at Group I Polymers and Resins 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 63, Subpart U.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility’s initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these 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 would submit electronic copies of notifications required in 40 CFR 63.9(b) and 63.9(j) and performance test data required in 40 CFR 63.506(i)(1) 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 U 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 U.

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 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 either 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* 87 FR 20847 on April 8, 2022. No additional 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 19 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the ‘burden’ associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both Dow Chemical, at 989-636-1000, and the International Institute of Synthetic Rubber Producers, Inc. (IISRP), at 713-783-5046. A response was received from the IISRP that provided a list of 18 synthetic rubber

production facilities. The IISRP also provided an estimated growth rate of 2.5% for 2019, a decrease of 8% for 2020, and an increase of 3.5% for 2021. Based on our consultation with the Agency's internal industry expert and information gathered by EPA for a potential rulemaking, approximately 19 respondents will be subject to these standards over the three-year period covered by this ICR. Although the industry response estimated a positive growth rate for 2019 and 2021, there was a larger decrease for 2020. We have assumed a growth rate of 0 new sources is accurate for the three-year period covered by this ICR.

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 that 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 owners and operators of EPPU and associated equipment at Group I Polymers and Resins manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 2822, which corresponds to the North American Industry Classification System (NAICS) 325212 for Synthetic Rubber Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal).

A source must make the following reports:

Notifications	
Application of construction or reconstruction.	§63.506(b)(2)
Request for extension of compliance.	§63.9(c), §63.506(b)
Notification that source is subject to special compliance requirements.	§63.9(d), §63.506(b)
Notification of Compliance Status.	§63.506(e)(5)
Notification of storage vessel inspection.	§63.506(e)(7)(i)
Notification of front-end process vents limit	§63.485(q)
Notification of back-end process vents limit	§63.499(f)(1)
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	
Semiannual reports of start-up, shutdown, and malfunction.	§63.506(b)(1)(ii)
Progress reports for sources receiving an extension of compliance.	§63.10(d)(4), §63.506(b)
Waiver of recordkeeping or reporting requirements.	§63.10(f), §63.506(b)
Supplemental reports for circumstances when the owner or operator of a source meets the requirements for failing to submit information required to be included in a specified report.	§63.506(e)(1)
Pre-compliance report.	§63.506(e)(3)
Emissions Averaging Plan.	§63.506(e)(4)
Updates to Emissions Averaging Plan.	§63.506(e)(4)(iv)
Semiannual or quarterly periodic reports.	§63.506(e)(6)
Request of approval for a nominal control efficiency for use in calculating credits for an emissions average.	§63.506(7)(ii)
Compliance redetermination report for back-end process operations using a control or recovery device.	§63.506(e)(7)(iii)
Reports of changes to the primary product for an EPPU or process unit as required by §§63.480(f)(3)(iii), 63.480(f)(9), or 63.480(f)(10)(iii)(C).	§63.506(e)(7)(iv)
Reports of changes or additions to plant sites.	§63.506(e)(7)(v)
Operating permit application.	§63.506(e)(8)
Back-end process vents records in periodic reports	§63.499(f), §63.506(e)(6)
Front-end process vents records in periodic reports	§63.506(d), §63.506(e)(6)
Performance test reports (electronic submission)	§63.506(i)(1)

A source must keep the following records:

Recordkeeping	
Retain data for 5 years.	§63.506(a)
Malfunction records.	§63.506(b)(1)
Records of start-up, shutdown, and malfunction.	§63.506(b)(1)(i)
Storage vessel records.	§63.506(d)

Recordkeeping	
Records of each measured data value or block average for 1 hour or shorter periods calculated from all measured data values during each period.	§§63.506(d)(1-2)
Records of daily average (or batch cycle daily average) values of each continuously monitored parameter calculated for each operating day.	§63.506(d)(3)
Records required when all recorded values are within the established limits.	§63.506(d)(6)
Records of the times and durations of all periods of: monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments; non-operation of the affected source (or portion thereof), resulting in cessation of the emission to which the monitoring applies; or any other periods during process or control device or recovery device operation when monitors are not operating.	§63.506(d)(7)
Records of calibration checks and documenting maintenance for CMS used to comply with this subpart.	§63.506(d)(8)
Records of information, if any, required as a condition of a waiver of recordkeeping or reporting requirements.	§63.509(d)(9)
Front-end process vent records.	§63.491
Back-end process vent records.	§63.498

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 21, 2011. 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 proposed 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, 1A, 2, 2A, 2C, 2D, 18, 25A, 26, 26A, 310a, 310b, 310c, 312a, 312b, 312c, 313a, 313b tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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.

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 Group I Polymers and Resins (40 CFR Part 63, Subpart U) (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 56,400 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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	$157.61 ($75.05 + 110%)
Technical	$123.94 ($59.02 + 110%)
Clerical	$62.52 ($29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(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 regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Monitoring equipment for process vents and wastewater[1]	$25,000	0	$0	$275,000	19	$5,225,000
Monitoring equipment for equipment leaks[1]	$7,000	0	$0	$0	0	$0
Totals (rounded)[2]			**$0**			**$5,230,000**

[1] Capital and O&M costs for process vents, wastewater, and equipment leaks are based on estimates for similar requirements in the HON (Subparts F, G, H and I). The HON uses the following assumptions:

1. Subpart G

-*Total Capital/Startup Cost of Monitoring Equipment:* The cost to purchase monitoring equipment is approximately $20-30K for process vents and wastewater operations, or an average of $25K with a 10-year life expectancy and a 7 percent depreciation rate, or $2,225 per year. There are no associated costs for transfer racks and storage tanks. Only new sources need to buy monitoring equipment.

-*Total Cost of Operation and Maintenance of Monitoring Equipment:* The cost to industry associated with O&M is approximately $100-500K per year (capital/startup depreciation not included) for reactor process vents and wastewater operations. The cost associated with the operation and maintenance is $50-100K per year (capital/startup depreciation not included) for distillation unit process vents. There are no associated costs for transfer racks and storage tanks. The average O&M cost is assumed to be the average of the two ranges, or $275,000 per year. Operation and maintenance incur for both new and existing sources.

2. Subpart H

-*Total Capital/Startup Cost of Monitoring Equipment:* Only new sources will buy an organic volatile analyzer. Estimate the average cost of a monitor is $7,000 with a 5-year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is, therefore, $7,000/5, or $1,400/yr.

-*Total Cost of Operation and Maintenance of Monitoring Equipment:* The operation of the monitors is included in the monitoring equipment costs. Maintenance costs on these units is incidental; therefore, no maintenance or operation costs are incurred.

3. The HON does not estimate any capital or O&M costs for Subparts F and I.

[2] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $5,230,000. This is the total of column G.

The average annual cost for capital/startup and/or operation and maintenance costs to

industry over the next three years of this ICR is estimated to be $5,230,000. 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 $25,900.

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

Managerial	$70.56 (GS-13, Step 5, $44.10 + 60%)
Technical	$52.37 (GS-12, Step 1, $32.73 + 60%)
Clerical	$28.34 (GS-6, Step 3, $17.17 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 Group I Polymers and Resins (40 CFR Part 63, Subpart U) (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 19 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 19 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	19	0	0	19
2	0	19	0	0	19
3	0	19	0	0	19
Average	0	19	0	0	19

[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 19.

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

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
Application of construction/reconstruction	0	1	0	0
Request for extension of compliance	0	1	0	0
Notification that source is subject to special compliance requirements	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of storage vessel inspection	19	6	0	114
Notification of front-end process vents limit	0	1	0	0
Notification of back-end process vents limit	0	1	0	0
Progress reports	0	2	0	0
Waiver of recordkeeping or reporting requirements	0	1	0	0
Supplemental report for failing to	0	1	0	0

Total Annual Responses				
submit information required to be included in reports				
Operating permit application	0	1	0	0
Pre-compliance report	0	1	0	0
Emissions averaging plan	0	1	0	0
Updates to emissions averaging plan	1	1	0	1
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging	0	1	0	0
Semiannual periodic reports	16	2	0	32
Quarterly periodic reports	3	4	0	12
Compliance redetermination report	2	1	0	2
Report of changes to the primary product for an EPPU or process unit	2	1	0	2
Report of changes or additions to plant sites	0	1	0	0
Malfunction report	2	2	0	4
			Total	167

The number of Total Annual Responses is 167.

The total annual labor costs are $6,770,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (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 56,400. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (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 338 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $5,230,000. 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 507 labor hours at a cost of $25,900; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an insignificant increase in burden from the most-recently approved ICR due to an adjustment. This increase (not reflected in the rounded total) is not due to any program changes. The adjustment increase is due to a correction of the calculation used to summarize the burden estimates for individual reporting requirements. There is a slight increase in costs, which is due to both the calculation correction and the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2021) to calculate respondent burden costs.

Since there are no changes in the regulatory requirements, and there is no significant industry growth, there are no changes in the capital/startup and/or operation and maintenance (O&M) costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 338 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-2022-0046. 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-2022-0046 and OMB Control Number 2060-0665 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 Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal)

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total Cost ($) [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Tech. and Systems	See 5F							
4. Reporting requirements								
A. Familiarize with regulatory requirements [c]	64	1	64	19	1,216	60.8	121.6	$167,896.16
B. Required activities [d]	6.08	13	79	19	1,501	75.1	150.1	$207,246.82
C. Create Information [d]	18.06	80	1,445	19	27,455	1,372.75	2,745.5	$3,790,780.49
D. Gather existing information [d]	2.33	300	699	19	13,281	664.05	1,328.1	$1,833,740.87
E. Write report								
Application of construction or reconstruction	2	1	2	0	0	0	0	$0
Request for extension of compliance	2	1	2	0	0	0	0	$0
Notification that source is subject to special compliance requirements	5	1	5	0	0	0	0	$0
Notification of compliance status	20	1	20	0	0	0	0	$0
Notification of storage vessel inspection [e]	5	6	30	19	570	28.5	57	$78,701

Notification of front-end process vents limit [f]	4	1	4	0	0	0	0	$0
Notification of back-end process vents limit [f]	4	1	4	0	0	0	0	$0
Progress reports for source receiving extension of compliance [g]	4	2	8	0	0	0	0	$0
Waiver of recordkeeping or reporting requirements	4	1	4	0	0	0	0	$0
Supplemental report for failing to submit information required to be included in reports [h]	2	1	2	0	0	0	0	$0
Operating permit application	40	1	40	0	0	0	0	$0
Pre-compliance report [i]	40	1	40	0	0	0	0	$0
Emissions averaging plan [j]	120	1	120	0	0	0	0	$0
Updates to emissions averaging plan [k]	20	1	20	1	20	1	2	$2,761
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging [j]	2	1	2	0	0	0	0	$0
Semiannual Periodic Reports [l]	80	2	160	16	2,560	128	256	$353,466
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting [l]	80	4	320	3	960	48	96	$132,550
Compliance redetermination report for back-end process operations using a control or recovery device [m]	20	1	20	2	40	2	4	$5,523
Report of changes to the primary product for an EPPU or process unit [n]	2	1	2	2	4	0.2	0.4	$552
Report of changes or additions to plant sites [o]	2	1	2	0	0	0	0	$0
Malfunction report [p]	8	2	16	2	32	1.6	3.2	$4,418

Subtotal for Reporting Requirements					**54,785**			$6,577,636
5. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system	See 5E							
E. Time to enter information								
Plan activities	See 4B							
Create, test, research, develop	See 4C							
Gather information, monitor, inspect	See 4D							
Process, compile, review [d]	20	1	20	19	380	19	38	$52,467.55
F. Train personnel [d]	2.1	10	21	19	399	19.95	39.9	$55,090.93
G. Adjust existing ways to comply with prev. appl. reg.	N/A							
H. Record and disclose information [d]	10.5	2	21	19	399	19.95	39.9	$55,090.93
Store, file and maintain records	1	12	12	19	228	11.4	22.8	$31,480.53
I. Audits	N/A							
Subtotal for Recordkeeping					**1,617**			**$194,130**
TOTAL ANNUAL BURDEN AND COST (rounded) [q]					**56,400**			**$6,770,000**
CAPITAL AND O&M COST (rounded) [q]								**$5,230,000**
GRAND TOTAL (rounded) [q]								**$12,000,000**

Assumptions:

[a] We assume there are 19 existing sources subject to the standard and no additional sources per year will be become subject to the standard during the three-year period of this ICR

[b] This ICR uses the following labor rates: $157.61 per hour for Executive, Administrative, and Managerial labor; $123.94 per hour for Technical labor, and $62.52 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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% to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

[c] This ICR assumes all existing sources will have to familiarize with the regulatory requirements each year.

[d] The burden for these activities are based on similar requirements in the HON NESHAP (Subparts F, G, H, and I). The HON NESHAP indicates that the activities within each burden category (i.e., process vents, equipment leaks, wastewater, heat exchangers, and equipment leaks) can vary significantly; therefore, it is too inaccurate to assume an average activity time (Column A) to calculate hours per facility (Column C). Rather, the HON NESHAP estimates the total hours per facility, estimates the number activities per year (Column B) and uses the two numbers to back-calculate Column A. The HON NESHAP also notes that the number of activities per year may vary from facility to facility, depending on consolidation of activities, collocated readings, etc. Since so much variability exists, it is important to note that this is an estimate and is only used to back-calculate Column A.

[e] This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

[f] This ICR assumes that notifications for front- and back-end limits are submitted during the initial compliance period.

[g] This ICR assumes that all existing sources are already in compliance; new sources cannot receive compliance extensions.

[h] This ICR assumes no respondents will be required to submit supplemental reports.

[i] This ICR assumes that 10% of new sources will submit precompliance reports.

[j] This ICR assume 10% of existing facilities will elect to use emission averaging and that all existing respondents are already in compliance; new facilities cannot use emissions averaging. This ICR also assumes no existing facilities will elect to use nominal control after submitting the initial emissions averaging plan.

[k] This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan.

[l] This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterly reports. In addition, the 10% of facilities using emissions averaging are required to submit quarterly reports [(10% x 19) + (5% x 19)= 2.85 sources, rounded to 3]. The remaining 16 sources will all submit semiannual reports.

[m] This ICR assumes 10% of sources will make a process change that will require a redetermination of compliance report.

[n] This ICR assumes that 10% of sources will have changes to their primary product.

[o] This ICR assumes that no respondents will make changes or additions to the plant sites.

[p] This ICR assumes that 10% of sources will have to submit malfunction reports.

[q] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Renewal)

Burden Item	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total Cost per year, $ [b]
Activity								
1. Performance Tests: Initial	40	1	40	0	0	0	0	$0
2. Performance Tests: Repeat [c]	40	1	40	0	0	0	0	$0
Reports Review:								
1. Application of construction or reconstruction [d]	2	1	2	0	0	0	0	$0
2. Notification that source is subject to special compliance requirements [d]	2	1	2	0	0	0	0	$0
3. Notification of compliance status [d]	40	1	40	0	0	0	0	$0
4. Notification of storage vessel inspection [e]	2	6	12	19	228	11.4	22.8	$13,390.90
5. Notification of front-end process vents limit [f]	2	1	2	0	0	0	0	$0
6. Notification of back-end process vents limit [f]	2	1	2	0	0	0	0	$0
7. Waiver of recordkeeping or reporting requirements	10	1	10	0	0	0	0	$0
8. Supplemental report for failing to submit information required to be	2	1	2	0	0	0	0	$0

included in reports [g]								
9. Implementation plan, precompliance report or permit [d]	20	1	20	0	0	0	0	$0
10. Updates to emissions averaging plan [h]	5	1	5	1	5	0.25	0.5	$293.66
11. Semiannual Periodic Reports [d, i]	4	2	8	16	128	6.4	12.8	$7,517.70
12. Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting [d, i]	4	4	16	3	48	2.4	4.8	$2,819.14
13. Compliance redetermination report for back-end process operations using a control or recovery device [j]	10	1	10	2	20	1	2	$1,174.64
14. Report of changes to the primary product for an EPPU or process unit [k]	2	1	2	2	4	0.2	0.4	$234.93
15. Report of changes or additions to plant sites [l]	2	1	2	0	0	0	0	$0
16. Malfunction report [m]	2	2	4	2	8	0.4	0.8	$469.86
TOTAL ANNUAL BURDEN AND COST (rounded) [n]					**507**			**$25,900**

Assumptions:

[a] We assume there are 19 existing sources subject to the standard and no additional sources per year will be become subject to the standard during 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 the benefit packages available to government: Managerial rate of $70.56 (GS-13, Step 5, $44.10 + 60%), Technical rate of $52.37 (GS-12, Step 1, $32.73 + 60%), and Clerical rate of $28.34 (GS-6, Step 3, $17.17 + 60%). These rates are from the Office of Personnel Management (OPM) "2022 General Schedule" which excludes locality rates of pay.

[c] This ICR assumes 20% of sources will have to repeat performance tests.

[d] The burden for these activities are based on similar requirements in the HON NESHAP (Subparts F, G, H, and I).

[e] This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

[f] This ICR assumes that notifications for front- and back-end limits are submitted during the initial compliance period.

[g] This ICR assumes no respondents will be required to submit supplemental reports.

[h] This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan. This activity may also include review of front-end or back-end operations limits.

[i] This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterly reports. In addition, the 10% of facilities using emissions averaging are required to submit quarterly reports. The remaining sources will all submit semiannual reports.
[j] This ICR assumes 10% of sources will make a process change that will require a redetermination of compliance report.
[k] This ICR assumes that 10% of sources will have changes to their primary product.
[l] This ICR assumes that no respondents will make changes or additions to the plant sites.
[m] This ICR assumes that 10% of sources will have to submit malfunction reports.
[n] Totals have