

ICR Summary Information

Hours per Response	338
Number of Respondents	19
Total Estimated Burden Hours	56,400
Total Estimated Costs	\$12,000,000
Annualized Capital O&M	\$5,230,000
Total Annual Responses	167
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Group I Polymers and Resins (40 CF

Burden item	(A)
	Person- hours per occurrence
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
B. Required activities ^d	6.08
C. Create Information ^d	18.06
D. Gather existing information ^d	2.33
E. Write report	
Application of construction or reconstruction	2
Request for extension of compliance	2
Notification that source is subject to special compliance requirements	5
Notification of compliance status	20
Notification of storage vessel inspection ^e	5
Notification of front-end process vents limit ^f	4
Notification of back-end process vents limit ^f	4
Progress reports for source receiving extension of compliance ^g	4
Waiver of recordkeeping or reporting requirements	4
Supplemental report for failing to submit information required to be included in reports ^h	2
Operating permit application	40
Precompliance report ⁱ	40
Emissions averaging plan ^j	120
Updates to emissions averaging plan ^k	20
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging ^j	2
Semiannual periodic reports ^l	80
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting ^l	80
Compliance redetermination report for back-end process operations using a control or recovery device ^m	20
Report of changes to the primary product for an EPPU or process unit ⁿ	2
Report of changes or additions to plant sites ^o	2
Malfunction report ^p	8
Subtotal for Reporting Requirements	
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
F. Train personnel ^d	2.1
G. Adjust existing ways to comply with prev. appl. reg.	N/A
H. Record and disclose information ^d	10.5
Store, file and maintain records	1
I. Audits	N/A
Subtotal for Recordkeeping	
TOTAL ANNUAL BURDEN AND COST (rounded) ^q	
CAPITAL AND O&M COST (rounded) ^q	
GRAND TOTAL (rounded) ^q	

Assumptions:

- a We assume there are 19 existing sources subject to the standard and no additional sources per year will become subject to
- b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have 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 therefore, it is too inaccurate to assume an average activity time (Column A) to calculate hours per facility (Column C). Rather, also notes that the number of activities per year may vary from facility to facility, depending on consolidation of activities, coll
- 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 per
- 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 plan.
- k This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissic
- l This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterly reports. 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.

R Part 63, Subpart U) (Renewal)

(B)	(C)	(D)	(E)
No. of occurrences per respondent per year	Person- hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person- hours per year (E=CxD)
1	64	19	1,216
13	79	19	1,501
80	1,445	19	27,455
300	699	19	13,281
1	2	0	0
1	2	0	0
1	5	0	0
1	20	0	0
6	30	19	570
1	4	0	0
1	4	0	0
2	8	0	0
1	4	0	0
1	2	0	0
1	40	0	0
1	40	0	0
1	120	0	0
1	20	1	20
1	2	0	0
2	160	16	2,560
4	320	3	960
1	20	2	40
1	2	2	4
1	2	0	0
2	16	2	32

1	20	19	380
10	21	19	399
2	21	19	399
12	12	19	228

the standard during the three-year period of this ICR
hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates are from the United States De
been increased by 110% to account for varying industry wage rates and the additional overhead business co

NESHAP indicates that the activities within each burden category (i.e., process vents, equipment leaks, was
the HON NESHAP estimates the total hours per facility, estimates the number activities per year (Column
ocated readings, etc. Since so much variability exists, it is important to note that this is an estimate and is or

iod.

n compliance; new facilities cannot use emissions averaging. This ICR also assumes no existing facilities w
ms averaging plan.

In addition, the 10% of facilities using emissions averaging are required to submit quarterly reports [(10% :

(F)	(G)	(H)
Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Total Cost (\$) ^b
60.8	121.6	\$167,896.16
75.1	150.1	\$207,246.82
1,372.75	2,745.5	\$3,790,780.49
664.05	1,328.1	\$1,833,740.87
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
28.5	57	\$78,701
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1	2	\$2,761
0	0	\$0
128	256	\$353,466
48	96	\$132,550
2	4	\$5,523
0.2	0.4	\$552
0	0	\$0
1.6	3.2	\$4,418
54,785		\$6,577,636

Labor Rates:	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

Old ICR, which is based on a the H
HON NESHAP - Old ICR said this Su
Old ICR, which is based on a the H
Old ICR, which is based on a the H
2 hrs is common for this notificatic
assumed 2 hrs
hrs based on 7H "initial" notification, r
hrs based on 7H, no new respondents
hrs based on 7H, I assumed bimonthly
per 2011 amendment
per 2011 amendment
hrs based on III, I assumed all existing
assumed 4 hrs
assumed 2 hrs
Operating permit has similar requirem
hrs based on 7H, no new respondents
hrs based on 4D (note Subpart 4D is n
hrs assumed. I also assumed 1 facility
hrs based on 4D (note Subpart 4D is n
hrs from HON NESHAP
10% for EA + 5% of other sources (as
I assumed 10% make changes require
hrs based on PPP "phys/operational cl
hrs based on PPP "phys/operational cl
8 hrs and 10% of sources is common f

19	38	\$52,467.55	HON NESHAP - see footnote d (Old ICR)
19.95	39.9	\$55,090.93	HON NESHAP - see footnote d (Old ICR)
19.95	39.9	\$55,090.93	Old ICR, which is based on a the HON NESHAP
11.4	22.8	\$31,480.53	From amendment, but assuming a 167 hr/responses
1,617		\$194,130	
56,400		\$6,770,000	
		\$5,230,000	
		\$12,000,000	

Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Hours of employment of workers beyond their wages and benefits, including business

stewater, heat exchangers, and equipment leaks) can vary significantly; B) and uses the two numbers to back-calculate Column A. The HON NESHAP is used to back-calculate Column A.

will elect to use nominal control after submitting the initial emissions averaging

x 19) + (5% x 19) = 2.85 sources, rounded to 3]. The remaining 16 sources will

ON but with slightly reduced values as there are fewer reqs for this Subpart than the HON
Subpart has fewer reqs than the HON; however, the burden in the old ICR was higher than the estimate in the most recent HC
ON but with slightly reduced values as there are fewer reqs for this Subpart than the HON
ON but with slightly reduced values as there are fewer reqs for this Subpart than the HON

on

10 new respondents

7 storage vessel emptying and degassing

3 sources are in compliance, new sources cannot get extensions.

ements to precompliance report so I assumed the hrs were the same.

ot necessarily related to this rule, but the other polymer rules did no include emissions averaging plans), I assumed 10% ex
per year will make a change necessitating an update to the EA plan.

ot necessarily related to this rule, but the other polymer rules did no include emissions averaging plans), I assumed 10% ex

sumed) - hrs same as semiannual

redetermination of compliance

ange", I assumed 10% will make change

ange", I assumed no respondents will make a change or addition

for malfunction reports

ICR said this Subpart has fewer reqs than the HON; however, the burden in the old ICR was higher than the estimate in the ICR said this Subpart has fewer reqs than the HON; however, the burden in the old ICR was higher than the estimate in the

ON but with reduced values as there are fewer reqs for this Subpart than the HON
all facilities have this requirement

e

ON ICR. Therefore, I used the HON estimate

isting respondents use EA, new respondents not allowed to use EA

isting respondents use EA and no sources using EA will request approval for nominal control efficiency after submitting the ini

most recent HON ICR. Therefore, I used the HON estimate)

most recent HON ICR. Therefore, I used the HON estimate)

tial plan, new respondents not allowed to use EA.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Group I Polymers and Resins (

Burden Item	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
Activity		
1. Performance Tests: Initial	40	1
2. Performance Tests: Repeat ^c	40	1
Reports Review:		
1. Application of construction or reconstruction ^d	2	1
2. Notification that source is subject to special compliance requirements ^d	2	1
3. Notification of compliance status ^d	40	1
4. Notification of storage vessel inspection ^e	2	6
5. Notification of front-end process vents limit ^f	2	1
6. Notification of back-end process vents limit ^f	2	1
7. Waiver of recordkeeping or reporting requirements	10	1
8. Supplemental report for failing to submit information required to be included in reports ^g	2	1
9. Implementation plan, precompliance report or permit ^d	20	1
10. Updates to emissions averaging plan ^h	5	1
11. Semiannual Periodic Reports ^{d,i}	4	2
12. Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting ^{d,i}	4	4
13. Compliance redetermination report for back-end process operations using a control or recovery device ^j	10	1
14. Report of changes to the primary product for an EPPU or process unit ^k	2	1
15. Report of changes or additions to plant sites ^l	2	1
16. Malfunction report ^m	2	2
TOTAL ANNUAL BURDEN AND COST (rounded) ⁿ		

Assumptions:

a We assume there are 19 existing sources subject to the standard and no additional sources per year will be become subj

b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for the (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

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 e

i This ICR assumes that 5% of sources will not qualify for semiannual reports and will be required to submit quarterly re 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 been rounded to 3 significant figures. Figures may not add exactly due to rounding.

40 CFR Part 63, Subpart U) (Renewal)

(C)	(D)	(E)	(F)	(G)
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 (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)
40	0	0	0	0
40	0	0	0	0
2	0	0	0	0
2	0	0	0	0
40	0	0	0	0
12	19	228	11.4	22.8
2	0	0	0	0
2	0	0	0	0
10	0	0	0	0
2	0	0	0	0
20	0	0	0	0
5	1	5	0.25	0.5
8	16	128	6.4	12.8
16	3	48	2.4	4.8
10	2	20	1	2
2	2	4	0.2	0.4
2	0	0	0	0
4	2	8	0.4	0.8
		507		

ect to the standard during the three-year period of this ICR

benefit packages available to government: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Tech
e of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

missions averaging plan. This activity may also include review of front-end or back-end operations limits.
ports. In addition, the 10% of facilities using emissions averaging are required to submit quarterly reports. 1

(H)
Total Cost per year, \$^b
\$0
\$0
\$0
\$0
\$0
\$0
\$13,390.90
\$0
\$0
\$0
\$0
\$0
\$0
\$293.66
\$7,517.70
\$2,819.14
\$1,174.64
\$234.93
\$0
\$469.86
\$25,900

Labor Rates:	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

Technical rate of \$52.37

The remaining

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
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
Monitoring equipment for process vents and wastewater ¹	\$25,000	0	\$0	\$275,000
Monitoring equipment for equipment leaks ¹	\$7,000	0	\$0	\$0
Totals (rounded) ²			\$0	

¹ Capital and O&M costs for process vents, wastewater, and equipment leaks are based on estimates for similar requiremen HON uses the following assumptions:

1. Subpart G

-Total Capital/Startup Cost of Monitoring Equipment: The cost to purchase monitoring equipment is approximately \$20 operations, or an average of \$25K with a 10-year life expectancy and a 7 percent depreciation rate, or \$2,225 per year. T 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 appr depreciation not included) for reactor process vents and wastewater operations. The cost associated with the operation a (capital/startup depreciation not included) for distillation unit process vents. There are no associated costs for transfer ra assumed to be the average of the two ranges, or \$275,000 per year. Operation and maintenance incur for both new and e

2. Subpart H

-Total Capital/Startup Cost of Monitoring Equipment: Only new sources will buy an organic volatile analyzer. Estimate 5-year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is, therefore,

-Total Cost of Operation and Maintenance of Monitoring Equipment: The operation of the monitors is included in the m 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.

(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
19	\$5,225,000
0	\$0
	\$5,230,000

\$5,230,000

nents in the HON (Subparts F, G, H and I). The

-30K for process vents and wastewater
 here are no associated costs for transfer racks

roximately \$100-500K per year (capital/startup
 nd maintenance is \$50-100K per year
 cks and storage tanks. The average O&M cost is
 xisting sources.

the average cost of a monitor is \$7,000 with a
 , \$7,000/5, or \$1,400/yr.

onitoring equipment costs. Maintenance costs

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	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 submit information required to be included in reports	0	1	0	0
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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	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.