SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (Renewal), EPA ICR Number 2356.06, OMB Control Number 2060-0636.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) were proposed on August 5, 2009, and promulgated on December 30, 2009. These regulations apply to existing and new chemical preparation facilities that conduct the mixing, milling, blending or extruding of industrial chemicals and that are area sources of hazardous air pollutants (HAPs). Area sources are classified as sources that emit less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs. New facilities include those that commenced either construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart BBBBBBB.

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 the delegated state or local authority can review them. If there is no such delegated authority, the EPA’s regional offices can review them. All other reports are sent to either the delegated state or local authority. If 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 owners and operators of chemical preparation facilities that are area sources and that conduct the mixing, milling, blending, or extruding of industrial chemicals, though not to be confused with non-industrial mixing or blending that occurs at a

pharmacy, in a laboratory, or in similar non-industrial circumstances. The 'burden' to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (Renewal). There are approximately three chemical preparation facilities, which are owned and operated by the chemical industry. None of the three facilities in the United States are owned by either state, or local, or tribal entities or by 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 three respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This ICR reflects a substantial decrease in the number of respondents in the currently-approved ICR, based on data collected from the chemical preparations industry as part of a 2020 section 114 information collection request.

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 chemical preparation sources 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 BBBBBBB.

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

The information obtained under the initial compliance demonstration, monitoring, recordkeeping, and reporting will be used by our enforcement personnel to: (1) identify existing and new HAP emission points subject to the NESHAP; (2) ensure that Generally Available Control Technology (GACT) is being properly applied; and (3) ensure that vent collection systems and control devices are being properly operated and maintained on a continuous basis to reduce HAP emissions from mixers, mixing and blending tanks, mills, and extruders.

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

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

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 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 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 standard, 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 3 respondents will be subject to these standards over the three-year period covered by this ICR. This ICR reflects a substantial decrease in the number of respondents in the currently-approved ICR, based on data collected from the chemical preparations industry as part of a 2020 section 114 information collection request.

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 these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Chemistry Council, at (202) 249-7000, and PPG Industries, at (412) 434-3046.

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 the 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 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 the standard 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 chemical preparation area sources. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2899 (Chemical Preparations, NEC) which corresponds to the North American Industry Classification System (NAICS) 325998 for All Other Miscellaneous Chemical Product and Preparation 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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB).

A source must make the following reports:

Notifications	
Initial notification of applicability	§63.11585(b)(1)
Notification of intent to construct or reconstruct	§63.5(d)(1), §63.9(b)(5)
Notification of commencement of construction or reconstruction	§63.5(d)(1)
Notification of anticipated and actual startup	§63.9(b)(5)
Request for compliance extension	§63.9(c)
Notification of initial performance tests	§63.11585(b)(2)
Notification of compliance status report (NOCSR) and test data	§§63.11585(b)(3), (6)
Results of initial management practices	§63.11585(b)(5)

Reports	
Annual and semiannual compliance reports	§63.11585(c)

A source must keep the following records:

Recordkeeping	
All notification and reports	§63.11585(d)(1)(i)
Records identifying periods when the chemical preparations operation is in target HAP service	§63.11585(d)(1)(ii)
Records of initial compliance demonstration	§63.11585(d)(1)(iii)
Records of continuous parameter monitoring	§63.11585(d)(1)(v)
Records of calibration and maintenance to continuous parameter monitoring equipment	§§63.11585(d)(1)(iv), (vi)
Records of vent collection system and control device inspection	§63.11585(d)(1)(vi)
Records of site-specific monitoring plan	§63.11585(d)(1)(vii)
Records of particulate control device manufacturing specifications and recommendations	§63.11585(d)(1)(viii)

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.

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 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 the bag leak detection system, control device parameter monitor system, and/or the continuous parameter monitoring system (CPMS) and alarm system(s) for proper operation of the control device.
Perform initial performance test, Reference Method 1 or 1A, 2, 2A, 2C, 2D, 2F, or 2G, 3, 3A, or 3B, 4 and 5 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.

Respondent Activities
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 standard 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. 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. 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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 176 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of these 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	$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)
Continuous parameter monitoring equipment[1]	NA	NA	NA	NA	NA	NA
Photocopy and postage[2]	NA	NA	NA	$15	3	$45
Total			$0			$45

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

[1] Assumes all affected sources will use existing continuous parameter monitoring equipment or alarms to

demonstrate continuous compliance. Therefore, no new equipment would be required to comply with the recordkeeping and reporting requirements of the NESHAP and no capital costs would be incurred.

[2] The annual operation and maintenance (O&M) costs include the cost of photocopying and mailing reports for initial compliance demonstrations (engineering calculations or performance guarantee information) and semiannual compliance reports. Photocopying and postage costs are incurred when reports required by the NESHAP are submitted to regulatory agencies. These costs were estimated to be $7.50 per report.

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 $45. 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 $45. 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 $456.

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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 3 existing respondents will be subject to these standards. It is estimated that no additional

respondents per year will become subject tomthese same standards. The overall average number of respondents, as shown in the table below, is 3 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	3	0	0	3
2	0	3	0	0	3
3	0	3	0	0	3
Average	0	3	0	0	3

[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 three.

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
Semiannual report[a]	3	2	0	6
			Total	6

[a] Although the rule allows for annual reports when there are no deviations, we assume that all respondents will have deviations requiring submittal of compliance reports semi-annually.

The number of Total Annual Responses is six.

The total annual labor costs are $21,100. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for

Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 176. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 29 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $45. 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 seven labor hours at a cost of $45; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (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 adjustment decrease in burden from the most-recently approved ICR is due to a decrease in the number of sources. This ICR reflects a substantial decrease in the number of respondents in the currently-approved ICR, based on data collected from the chemical

preparations industry as part of a 2020 section 114 information collection request. There were 26 affected sources estimated in the most-recently approved ICR, and this ICR renewal estimates there are three affected sources. The number of sources has decreased by 88 percent, which reflects an overall decline in the industry. There are no capital/startup costs in this ICR. The O&M costs decreased due to the decreased number of affected sources.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 29 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information eitherto 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-2022-0044. 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-2022-0044 and OMB Control Number 2060-0636 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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (Renewal)

Burden Items	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)[a]	(G) Clerical Hours per Year (Ex0.1)[a]	(H) Total Labor Costs per Year, $[b]
1. Familiarization with the regulatory requirements	4	1	4	3	12	0.6	1.2	$1,656.87
2. Required activities								
a. Initial performance tests [c, d]	8	1	8	0	0	0	0	$0
b. Engineering calculations or performance guarantees [d, e]	8	1	8	0	0	0	0	$0
c. Continuous parameter monitoring [e, f]	8	1	8	0	0	0	0	$0
3. **Reporting requirements**								
a. Initial notification that existing facilities are subject to the standard [c, g]	4	1	4	0	0	0	0	$0
b. Notification of new area sources [c]								
(1) Notification of intent to construct/reconstruct	4	1	4	0	0	0	0	$0
(2) Notification to commence construct/reconstruct	4	1	4	0	0	0	0	$0
(3) Notification of startup	4	1	4	0	0	0	0	$0
c. Request for compliance extension [h]	4	1	4	0	0	0	0	$0
d. Notification of initial performance test [c, d]	2	1	2	0	0	0	0	$0
e. Notification of compliance status [c]	4	1	4	0	0	0	0	$0
f. Gather information for semiannual reports [i]	4	2	8	3	24	1.2	2.4	$3,313.74

g. Semiannual compliance reports [i]	4	2	8	3	24	1.2	2.4	$3,313.74
Subtotal for Reporting Requirements					***69***			***$8,284.35***
4. **Recordkeeping Requirements**								
a. Develop a record system [c]	4	1	4	0	0	0	0	$0
b. Develop a monitoring plan [c]	4	1	4	0	0	0	0	$0
c. Implement activities								$0
(1) Record performance tests [c]	1	1	1	0	0	0	0	$0
(2) Record periods of target HAP service and deviations	0.5	52	3	3	9	0.45	0.9	$1,242.65
(3) Continuous parameter monitoring system inspections, calibration and maintenance [j]	1	12	12	3	36	1.8	3.6	$4,970.61
(4) Vent collection systems and control inspections	1	12	12	3	36	1.8	3.6	$4,970.61
d. Store, file and maintain records	4	1	4	3	12	0.6	1.2	$1,656.87
5. Time to train personnel_	4	1	4	0	0	0	0	$0
6. Prepare for and participate in audits	0	0	0	0	0	0	0	$0
Subtotal for Recordkeeping Requirements					***107***			***$12,840.74***
TOTAL Labor Burden and Costs (rounded) [k]					**176**			**$21,100**
TOTAL Capital and O&M Costs (rounded) [k]								**$45**
GRAND TOTAL (rounded) [k]								**$21,100**

Assumptions:

[a.] We have assumed that there are approximately 3 respondents subject to the rule, with no new sources expected over the three-year period covered by this ICR.

[b.] This ICR uses the following labor rates: Managerial $157.61 ($75.05 + 110%); Technical $123.94 ($59.02 + 110%); and 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.

[c.] We assume that this is a one-time only activity for new facilities.

[d.] One-time activity for new and existing facilities after promulgation of final rule. We assume that performance tests are not required for any of the existing facilities to demonstrate compliance with the emission limits. Instead, we assume that 50 percent of the industry will have existing performance tests that demonstrate compliance with the emission limits, and the other 50 percent will use performance guarantees or engineering calculations to demonstrate compliance.

[e.] We assume that all existing facilities will use their existing continuous parameter monitoring equipment or alarms to demonstrate continuous compliance.

[f.] There is no additional burden for new monitoring equipment because additional add-on control devices are not expected to be needed to demonstrate compliance with the emission limits and facilities are already equipped with equipment to monitor existing control device parameters.

[g.] Existing facilities must submit notification that they are subject to the standard within 120 days of the effective date of final rule (December 30, 2009).

[h] We assume that compliance extensions will not be necessary.

[i] We assume that all respondents will have deviations requiring submittal of compliance reports semi-annually. We assume that semiannual compliance reports will take each respondent 4 hours twice per year to prepare.

[j] We have assumed that each respondent will take 1 hour 12 times per year to implement the continuous parameter monitoring system inspections, calibration and maintenance activity.

[k] 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 Chemical Preparations Industry (40 CFR Part 63, Subpart BBBBBBB) (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Plant per Year	(C) EPA Hours per Plant per Year (AxB)	(D) Plants per Year [a]	(E) Technical EPA Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.1)	(H) Cost per year, $[b]
1. Familiarization with the regulatory requirements	2	1	2	0	0	0	0	$0
2. Required activities								
a. Initial performance tests [c, d, e]	8	1	8	0	0	0	0	$0
b. Review initial performance test reports, performance guarantees, engineering	4	1	4	0	0	0	0	$0
c. Enter and update information into agency recordkeeping system	1	1	1	0	0	0	0	$0
3. Excess emissions – enforcement activities [f]	N/A							
4. Notification requirements								
a. Review initial notification that existing facilities are subject to the standard [c, g]	1	1	1	0	0	0	0	$0
b. Notifications for new area sources [h]								
(1) Review notification of intent to construct/reconstruct	4	1	4	0	0	0	0	$0
(2) Review notification of commencement of construction/reconstruction	2	1	2	0	0	0	0	$0
(3) Review notification of startup	2	1	2	0	0	0	0	$0
c. Review request for compliance extension [i]	2	1	2	0	0	0	0	$0
d. Review notification of initial performance tests [c, d, e]	1	1	1	0	0	0	0	$0
e. Review notification of compliance status [c, j]	4	1	4	0	0	0	0	$0
5. Reporting requirements – review semiannual compliance reports [k]	4	2	8	0.8	6	0.3	0.6	$456.08

TOTAL (rounded) [l]					**7**	**$456**

Assumptions:

[a.] We have assumed that there are approximately 3 respondents subject to the rule, with no new sources expected over the three-year period covered by this ICR.

[b.] 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%); and Clerical $28.34 (GS-6, Step 3, $17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. 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 government employees.

[c.] We assume that this is a one-time only cost.

[d.] We assume that EPA technical personnel will observe all performance tests conducted by new sources.

[e.] We have assumed that not emission tests will need to be performed. Facilities will utilize existing performance tests, performance guarantees, or engineering calculations to demonstrate initial compliance

[f.] We have assumed that there would be no enforcement activities for the 3-year period covered by this ICR.

[g.] We assume that existing area source facilities must submit notification that they are subject to and the standard within 120 days of the effective date of the final rule (December 30, 2009).

[h] There are no new sources expected over the next three years of this ICR.

[i] We have assumed that compliance extensions will not be necessary.

[j] Assume that EPA technical personnel will review all of the initial compliance status notifications for new sources.

[k] We assume that EPA technical personnel will review 25 percent of the semiannual compliance reports.

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