

ICR Summary Information

Hours per Response	29
Number of Respondents	3
Total Estimated Burden Hours	176
Total Estimated Costs	\$21,100
Annualized Capital O&M	\$45
Total Annual Responses	6
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Preparations Ind

Burden Items	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year
1. Familiarization with the regulatory requirements	4	1
2. Required activities		
a. Initial performance tests ^{c, d}	8	1
b. Engineering calculations or performance guarantees ^{d, e}	8	1
c. Continuous parameter monitoring ^{e, f}	8	1
3. Reporting requirements		
a. Initial notification that existing facilities are subject to the standard ^{c, g}	4	1
b. Notification of new area sources ^c		
(1) Notification of intent to construct/reconstruct	4	1
(2) Notification to commence construct/reconstruct	4	1
(3) Notification of startup	4	1
c. Request for compliance extension ^h	4	1
d. Notification of initial performance test ^{c, d}	2	1
e. Notification of compliance status ^c	4	1
f. Gather information for semiannual reports ⁱ	4	2
g. Semiannual compliance reports ⁱ	4	2
Subtotal for Reporting Requirements		
4. Recordkeeping Requirements		
a. Develop a record system ^c	4	1
b. Develop a monitoring plan ^c	4	1
c. Implement activities		
(1) Record performance tests ^c	1	1
(2) Record periods of target HAP service and deviations	0.5	52
(3) Continuous parameter monitoring system inspections, calibration and maintenance ⁱ	1	12
(4) Vent collection systems and control inspections	1	12
d. Store, file and maintain records	4	1
5. Time to train personnel	4	1
6. Prepare for and participate in audits	0	0
Subtotal for Recordkeeping Requirements		
TOTAL Labor Burden and Costs (rounded) ^k		
TOTAL Capital and O&M Costs (rounded) ^k		
GRAND TOTAL (rounded) ^k		

Assumptions:

^a We have assumed that there are approximately 3 respondents subject to the rule, with no new sources expected o

^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Civilian Workers, by occupational an been increased by 110 percent to account for varying industry wage rates and the additional overhead business cost 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 test emission limits. Instead we assume that 50 percent of the industry will have existing performance tests that demonstrate performance guarantees or engineering calculations to demonstrate compliance.
- ^e We assume that all existing facilities will use their existing continuous parameter monitoring equipment or alarm.
- ^f There is no additional burden for new monitoring equipment because additional add-on control devices are not required; they 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.
- ^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 allow 1 year to prepare.
- ^j We have assumed that each respondent will take 1 hour 12 times per year to implement the continuous parameter monitoring.
- ^k Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ustry (40 CFR Part 63, Subpart BBBBBBB) (Renewal)

(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
4	3	12	0.6	1.2	\$1,656.87
8	0	0	0	0	\$0
8	0	0	0	0	\$0
8	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
8	3	24	1.2	2.4	\$3,313.74
8	3	24	1.2	2.4	\$3,313.74
			69		\$8,284.35
4	0	0	0	0	\$0
4	0	0	0	0	\$0
					\$0
1	0	0	0	0	\$0
3	3	9	0.45	0.9	\$1,242.65
12	3	36	1.8	3.6	\$4,970.61
12	3	36	1.8	3.6	\$4,970.61
4	3	12	0.6	1.2	\$1,656.87
4	0	0	0	0	\$0
0	0	0	0	0	\$0
			107		\$12,840.74
			176		\$21,100
					\$45
					\$21,100

Labor Re
Management
Technical
Clerical

ver the three-year period covered by this ICR.

); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States
 d industry group.” The rates are from column 1, “Total compensation.” The rates have
 s of employing workers beyond their wages and benefits, including business expenses

ests are not required for any of the existing facilities to demonstrate compliance with the
strate compliance with the emission limits, and the other 50 percent will use

is to demonstrate continuous compliance.

xpected to be needed to demonstrate compliance with the emission limits and facilities

late of final rule (December 30, 2009).

e assume that semiannual compliance reports will take each respondent 4 hours twice per

monitoring system inspections, calibration and maintenance activity.

ites
\$157.61
\$123.94
\$62.52

hr/resp

Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Preparations Industry (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurren ces per Plant per Year	(C) EPA Hours per Plant per Year (AxB)	(D) Plants per Year ^a
1. Familiarization with the regulatory requirements	2	1	2	0
2. Required activities				
a. Initial performance tests ^{c, d, e}	8	1	8	0
b. Review initial performance test reports, performance guarantees, engineering	4	1	4	0
c. Enter and update information into agency recordkeeping system	1	1	1	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
b. Notifications for new area sources ^h				
(1) Review notification of intent to construct/reconstruct	4	1	4	0
(2) Review notification of commencement of construction/reconstruction	2	1	2	0
(3) Review notification of startup	2	1	2	0
c. Review request for compliance extension ⁱ	2	1	2	0
d. Review notification of initial performance tests ^{c, d, e}	1	1	1	0
e. Review notification of compliance status ^{c, j}	4	1	4	0
5. Reporting requirements – review semiannual compliance reports ^k	4	2	8	0.8
TOTAL (rounded) ^l				

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 \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and these rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality, rates of pay, and 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 all emission tests will need to be performed. Facilities will utilize existing performance tests, perform initial compliance tests, and 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 standard's effective date (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.

¹Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

40 CFR Part 63, Subpart BBBBBBB)

(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
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	0	\$0
0	0	0	\$0
6	0.3	0.6	\$456.08
7			\$456

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

ee-year period covered by this ICR.

l \$52.37 (GS-12, Step 1, \$32.73 + 60%); and
 . Clerical hours are 10 percent of Technical hours.
 ay. The rates have been increased by 60 percent to

rmance guarantees, or engineering calculations to

days of the effective date of the final rule

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Continuous parameter monitoring equipment ¹	NA	NA	NA
Photocopy and postage ²	NA	NA	NA
Totals (rounded)			\$0

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 be required to comply with the recordkeeping and reporting requirements of the NESHAP and no capital equipment is negligible.

² The annual operation and maintenance (O&M) costs include the cost of photocopying and mailing reports (performance guarantee information) and semiannual compliance reports. Photocopying and postage costs to regulatory agencies. These costs were estimated to be \$7.50 per report.

Annual O&M Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
NA	NA	NA
\$15	3	\$45
		\$45

to demonstrate continuous compliance. Therefore, no new equipment would be required and no additional costs would be incurred. We assume the O&M costs associated with this

work for initial compliance demonstrations (engineering calculations or reports) are incurred when reports required by the NESHAP are submitted to

\$45

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 $E=(B \times C)+D$
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 ha

ive deviations requiring submittal of compliance reports semi-annually.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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
1	0	3	0	0
2	0	3	0	0
3	0	3	0	0
Average	0	3	0	0

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
3
3
3
3