

ICR Summary Information

Hours per Response	38
Number of Respondents	97
Total Estimated Burden Hours	6,640
Total Estimated Costs	\$1,330,000
Annualized Capital O&M	\$534,000
Total Annual Responses	175
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Commercial Ethylene Oxide Steri Operations (40 CFR Part 63, Subpart O) (Renewal)

Burden Items	(A) Hours per occurrence	(B) Occurrenc es per year	(C) Hours per year (AxB)	(D) Responden ts per year ^a	(E) Technical hours per year (CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	1	1	1	97	97
B. Required Activities					
Initial performance test ^c	200	1	200	0	0
Repeat performance test ^{c, d}	200	1	200	0	0
Preparation of site-specific test plan	Included Above				
C. Create Information	See 3B				
D. Gather Existing Information	See 3B				
E. Write Reports					
Notification of applicability ^e	2	1	2	0	0
Notification of construction/reconstruction ^e	2	1	2	0	0
Notification of actual startup ^e	2	1	2	0	0
Notification of initial performance test ^e	2	1	2	0	0
Notification of compliance status ^e	2	1	2	0	0
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0
Request for waiver ^f	6	1	6	0	0
Report for alternative method monitoring ^g	6	1	6	0	0
Report for performance test ^h	24	1	24	0	0
Reports for periods of noncompliance (including excess emissions) ⁱ	14	2	28	87.3	2,444
Subtotal for Reporting					
4. Recordkeeping Requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	See 3B				
E. Time to Enter Information					
Record of operating parameters and emissions ^j	0.1	365	36.5	87.3	3,186
Records of EO use ^k	0.6	12	7.2	0	0
F. Time to transmit or disclose information ^l	0.25	2	0.5	87.3	43.65
G. Train Personnel	N/A				
H. Time for Audits	N/A				
Subtotal for Recordkeeping					
Total Labor Burden and Costs (rounded) ^m					
Total Capital and O&M Cost (rounded) ^m					
Grand Total (rounded) ^m					

Assumptions:

- ^a There are an average of 97 respondents subject to the rule over the three-year period of this ICR. No new sources per year over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05+ 110%); Technical \$123.94 (\$59.02 + 110%); and other rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Civilian Workers.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for varying indirect overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with employees.
- ^c Assumes it will take 200 hours for each respondent to perform the initial and any repeat performance testing.
- ^d Assumes that 20 percent of respondents will have to repeat performance tests due to failure.
- ^e Assumes that it will take new respondents two hours to write each notification report.
- ^f Assumes that 10 percent of new facilities will request a waiver and that it will take 6 hours to write requests for waivers.
- ^g Assumes that 5 percent of new facilities will request an alternative monitoring method.
- ^h Assumes that it will take 24 hours to prepare performance test reports.
- ⁱ Assumes that 90 percent of respondents will take 14 hours each to complete reports of periods of noncompliance, which is two times per year.
- ^j Assumes that 90 percent of respondents will enter information on record of operating parameters and emissions 365 times per year.
- ^k Assumes that 10 percent of facilities that are existing but also new are required to record EO usage. In this ICR, there are recording EO use.
- ^l Assumes that 90 percent of respondents will submit reports twice per year.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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(F) Managerial hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total Cost per year, \$ ^b
4.85	9.7	\$13,393.03
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
122.22	244.44	\$337,504.42
2,923		\$350,897.45
159.3225	318.645	\$439,961.12
0	0	\$0
2.1825	4.365	\$6,026.86
3,715		\$445,987.98
6,640		\$797,000
		\$534,000
		\$1,330,000

Technical	Management	Clerical
\$123.94	\$157.61	\$62.52

175 # responses
38 hr per resp

ar are expected to become subject to the rule

Clerical \$62.52 (\$29.77 + 110%). These
kers, by occupational and industry group.”
ndustry wage rates and the additional
th hiring, training, and equipping their

ncludes excess emissions. This will occur

; per year.

no such affected facilities, so none will be

Table 2: Average Annual EPA Burden and Cost – NESHAP for Commercial Ethylene Oxide Storage Operations (40 CFR Part 63, Subpart O) (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (CxD)
Initial performance tests					
New or modified facility ^c	40	1	40	0	0
Repeat performance tests					
New or modified facility ^d	40	1	40	0	0
Report Review					
New or modified facility					
Notification of applicability	2	1	2	0	0
Notification of construction/reconstruction ^e	2	1	2	0	0
Notification of actual startup ^e	2	1	2	0	0
Notification of initial performance test ^e	2	1	2	0	0
Notification of compliance status ^e	2	1	2	0	0
Request for extension of compliance, adjustment to time periods, and changes in information ^f	2	1	2	0	0
Request for waiver ^g	4	1	4	0	0
Request for alternative method/monitoring ^h	4	1	4	0	0
Report of performance test ⁱ	8	1	8	0	0
Report of periods of noncompliance (including excess emissions) ^j	8	2	16	17.5	279
Total (rounded)^k					

Assumptions:

^a There are an average of 97 respondents subject to the rule over the three-year period of this ICR. No additional new sources subject to the rule over the three-year period of 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 \$60.56 (GS-13, Step 5, \$37.22 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.71 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c Assumes that the Agency will take 40 hours to observe the initial performance test.

^d Assumes that 20 percent of new respondents will fail the performance test and will have to repeat it.

^e Assumes that the Agency will take two hours to review each notification report.

^f Assumes that the Agency will take two hours to review each request for extension of the compliance report.

^g The Agency assumes that 10 percent of new facilities will request a waiver.

^h The Agency assumes that 5 percent of new facilities will request an alternative method monitoring.

ⁱ Assumes that the Agency will take 8 hours to review the report of performance test results.

^j Assumes the Agency will review 20 percent of noncompliance reports and that it will take the Agency 8 hours to review

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

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(F) Managerial Hours per Year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total 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
14.0	27.9	\$16,407.37
321		\$16,400

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

rces per year are expected to become

ical \$52.37 (GS-12, Step 1, \$32.73 +
ical hours, and Clerical hours are 10
ich excludes locality, rates of pay. The

reports of periods of noncompliance.

Number of Respondents

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	97	0	0	97
2	0	97	0	0	97
3	0	97	0	0	97
Average	0	97	0	0	97

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 $E=(B \times C)+D$
Notification of Applicability	0	1	0	0
Notification of Construction/Reconstruction	0	1	0	0
Notification of Actual Startup	0	1	0	0
Notification of Initial Performance Test	0	1	0	0
Notification of Compliance Status	0	1	0	0
Request for Waiver	0	1	0	0
Report for Alternative Method/Monitoring	0	1	0	0
Report for Performance Test	0	1	0	0
Reports for Periods of Noncompliance ^a	87.3	2	0	174.6
			Total (rounded)	175

^a Assumes that 90% of respondents will complete reports of periods of noncompliance, which includes excess emissions. This will occur two times per year.

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Computer equipment and GC ¹	\$32,500	0	\$0	\$5,500	97

^a Computer equipment and gas chromatograph (GC) are used to continuously monitor EO emissions to aeration room and ba chamber vents.

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

(G)
Total O&M, (E X F) ²
\$534,000

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Total \$534,000