

### ICR Summary Information

Hours per Response	478
Number of Respondents	50
Total Estimated Burden Hours	47,800
Total Estimated Costs	\$6,650,000
Annualized Capital O&M	\$908,000
Total Annual Responses	100

**Table 1: Annual Respondent Burden and Cost – NESHAP for Off-Site Waste and Recovery Op**

Burden Items	(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 <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with rule requirement <sup>c</sup>	4	1	4	50
B. Required Activities	See 4C			
C. Create Information	See 4C			
D. Gather Existing Information	See 4C			
E. Write Reports				
Initial Notification Report <sup>d</sup>	1	1	1	0
Performance Test Notification Report <sup>d</sup>	1	1	1	0
Compliance Status Notification <sup>d</sup>	2	1	2	0
Performance Test Reports <sup>d</sup>	8	1	8	0
Semiannual Summary Report <sup>e</sup>	8	2	16	50
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping Requirements				
A. Familiarize with rule requirements	See 3A			
B. Planned Activities	N/A			
C. Implementation of Activities				
a. VOHAP concentration determination				
Commercial Facilities <sup>f</sup>	2	260	520	25
Other Facilities <sup>g</sup>	2	12	24	25
b. Vapor Pressure Determination				
Commercial Facilities <sup>f</sup>	1	260	260	25
Other Facilities <sup>g</sup>	1	12	12	25
c. Control Equipment Visual Inspection				
Large Cover	0.25	10	2.5	50
Small Cover	0.05	1000	50	50
Closed Vent System	0.5	5	2.5	50
d. Control Equipment Leak Monitoring				
Cover Vented to Control Device	1	5	5	50
Closed Vent System	1	5	5	50
e. Control Devices				
Continuous Monitoring System	8	5	40	50
f. LDAR Program				
Perform Monitoring/Repair	80	1	80	50
g. PRD monitoring				
Perform Monitoring/Repair	16	1	16	50
D. Develop Record System	N/A			
E. Time to Enter Information				
Control Equipment Inspections	1	1	1	50

Control Equipment Monitoring	1	1	1	50
Control Device CMS	1	52	52	50
LDAR Program	4	16	64	50
PRD Program	2	16	32	50
Off-site Material Determinations	1	52	52	50
F. Time to Train Personnel	N/A			
G. Time for Audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded):<sup>h</sup></b>				
<b>TOTAL CAPITAL AND O&amp;M COST:<sup>h</sup></b>				
<b>GRAND TOTAL:<sup>h</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 50 respondents, with no additional new or reconstructed sources in the next 5 years.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%). Rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for additional overhead business costs of employing workers beyond their wages and benefits, including business equipping their employees.

<sup>c</sup> It is assumed that it will take 4 hours to read instructions.

<sup>d</sup> It is assumed that there will be no new sources.

<sup>e</sup> The burden of one annual summary report was included in the burden estimate for the semiannual report.

<sup>f</sup> It is assumed that 50 percent of the facilities, the owner or operator manages, for a fee, off-site materials recycling.

<sup>g</sup> It is assumed that 50 percent of the owners or operators accept the off-site material at another location and store it.

<sup>h</sup>Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**erations (40 CFR Part 63, Subpart DD) (Renewal).**

123.94      157.61      62.52

(E) Technical person hours per year (CxD)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total costs per year \$ <sup>b</sup>
200	10	20	\$27,615
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
800	40	80	\$110,458
<b>1,150</b>			<b>\$138,073</b>
13,000	650	1,300	\$1,794,943
600	30	60	\$82,844
6,500	325	650	\$897,471
300	15	30	\$41,422
125	6.25	12.5	\$17,259
2500	125	250	\$345,181
125	6.25	12.5	\$17,259
250	12.5	25	\$34,518
250	12.5	25	\$34,518
2,000	100	200	\$276,145
4,000	200	400	\$552,290
800	40	80	\$110,458
50	2.5	5	\$6,904

50	2.5	5	\$6,904
2,600	130	260	\$358,989
3,200	160	320	\$441,832
1,600	80	160	\$220,916
2,600	130	260	\$358,989
<b>46,633</b>			<b>\$5,598,840</b>
<b>47,800</b>			<b>\$5,740,000</b>
			<b>\$908,000</b>
			<b>\$6,650,000</b>

478 hr per resp

prices becoming subject to the rule over the next three

+ 110%); and Clerical \$62.52 (\$29.77 + 110%). These Civilian Workers, by occupational and industry account for varying industry wage rates and the expenses associated with hiring, training, and

received from other generators.

ship it to the facility for storage, treatment, or disposal.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Off-Site Waste and Recovery Op**  
52.37

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/ Year	(C) EPA Hours/ Year (AxB)	(D) Plants/ Year <sup>a</sup>	(E) Technical Hours/ Year (Cx D)
Report Review					
New Plants <sup>c, d</sup>					
Initial notification (PRD)	2	1	2	0	0
Performance test notification	1	1	1	0	0
Compliance status notification	4	1	4	0	0
Performance test report <sup>e</sup>	16	1	16	0	0
Existing Plants					
Startup/shutdown report	N/A				
Semiannual summary report <sup>f</sup>	4	2	8	50	400
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>					

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 50 respondents, with no additional new or reconstructed sources over the next three years.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technical \$52.37 and Clerical \$28.34 (GS-6, Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (which excludes locality rates of pay). The rates have been increased by 60 percent to account for the benefit package for employees.

<sup>c</sup> There will be no travel expenses associated with this ICR since we have assumed that no new sources will be added during the three year period of this ICR.

<sup>d</sup> It is assumed that there will be no new sources over the three year period of this ICR.

<sup>e</sup> It is assumed that it will take 16 hours to review each performance test report.

<sup>f</sup> It is assumed that each facility will take 4 hours twice a year to submit report.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Operations (40 CFR Part 63, Subpart DD) (Renewal).**

70.56 28.34

(F) Managerial Hours/ Year (Ex0.05)	(G) Clerical Hours/ Year (Ex0.1)	(H) Costs, \$ <sup>b</sup>
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
20	40	\$23,493
<b>460</b>		<b>\$23,500</b>

es becoming subject to the rule

(GS-12, Step 1, \$32.73 + 60%);  
OPM), 2022 General Schedule,  
kages available to government

come subject to this rule over the

<b>Capital/Startup vs. Operation and Maintenance (</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent</b>	<b>Number of New Respondents</b>	<b>Total Capital/Startup Cost, (B X C)</b>
O&M <sup>a</sup>	\$0	0	\$0
LDAR	\$41,254	0	\$0
PRD Monitoring Equipment <sup>b</sup>	\$27,000	0	\$0
Storage Tanks Duct Work <sup>c</sup>	\$76,412	0	\$0
<b>Totals (rounded) <sup>d</sup></b>			<b>\$0</b>

<sup>a</sup> The 2014 proposal ICR (1717.10) states "Based on a previous ICR for the Pesticide Active Ingredient source category, the cost of photocopying and postage in 2011 dollars, inflating this number from 2011 dollars to 2013 dollars gives \$1,505 per source." These are the costs for photocopying and postage. These costs have been adjusted from 2013 dollars to 2021 dollars.

<sup>b</sup> Reflects updated costs for PRD monitoring for stationary sources from the January 29, 2018 final rule (83 FR 6000). The cost of PRD monitoring (including a 10-year useful life and a seven percent interest rate) are estimated to be approximately \$4,000. See memorandum from Carey, J. "Site Waste and Recovery Operations (OSWRO) June 26, 2017", Docket Id. No. EPA-HQ-OAR-2012-0360-013

<sup>c</sup> Costs shown are the total costs for the estimated 21 additional tanks captured under the new 2015 threshold from the 2015 rule.

<sup>d</sup> Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.



**O&M) Costs**

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
\$1,878	50	\$93,900
\$11,876	50	\$593,800
\$4,000	50	\$200,000
\$20,797	1	\$20,797
		<b>\$908,000</b>

\$908,000

category, which estimated the annual O&M costs to be \$1,450 per source ongoing costs to maintain the monitor and other costs such as

3986). The annualized costs per facility (assuming a 15-year equipment A., EPA, "Pressure Relief Device Control Options and Impacts for Off-3.

in the March 2015 final rule.

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents <sup>a</sup>	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Initial Notification (PRD)	0	1	0	0
Performance Test Notification	0	1	0	0
Compliance Status Notification	0	1	0	0
Performance Test Report	0	1	0	0
Semiannual report	50	2	0	100
			<b>Total</b>	<b>100</b>

<sup>a</sup> We have assumed that there are approximately 50 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

<b>Number of Respondents</b>				
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>	
	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Year</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Number of Existing Respondents</b>	<b>Number of Existing Respondents that keep records but do not submit reports</b>	<b>Number of Existing Respondents That Are Also New Respondents</b>
1	0	50	0	0
2	0	50	0	0
3	0	50	0	0
Average	0	50	0	0

<sup>a</sup> New respondents include sources with constructed and reconstructed affected facilities.

<b>(E)</b>
<b>Number of Respondents (E=A+B+C-D)</b>
50
50
50
<b>50</b>