

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**Review of the New Source Performance Standards for VOC from Air Oxidation Unit Processes in the SOCFI (40 CFR Part 60, Subpart IIIa) (Proposed Rule)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

Review of the New Source Performance Standards for VOC from Air Oxidation Unit Processes in the SOCFI (40 CFR Part 60, Subpart IIIa) (Proposed Rule), EPA ICR Number 2756.01, OMB Control Number 2060-NEW.

**1(b) Short Characterization/Abstract**

The NSPS for the SOCFI Air Oxidation Unit Processes were proposed on October 21, 1983, promulgated on June 29, 1990, and most-recently amended on December 14, 2000. This information collection request is for a new subpart IIIa, which will apply to the following facilities for which construction, modification or reconstruction is commenced after the date of proposal: 1) each air oxidation reactor not discharging its vent stream into a recovery system; 2) each combination of an air oxidation reactor and the recovery system into which its vent stream is discharged; and 3) each combination of two or more air oxidation reactors and the common recovery system into which their vent streams are discharged. The standards apply to the affected facility which produces one or more of the chemicals listed in §60.617a as a product, co-product, byproduct, or intermediate. The regulated pollutants are VOC. The EPA is proposing requirements for new, modified, or reconstructed sources as follows: require owners and operators reduce emissions of TOC (minus methane and ethane) from all vent streams of an affected facility (and not allow the alternative of maintaining a TRE index value greater than 1 without the use of a control device); exclude SSM provisions (and instead, the standards apply at all times); revise monitoring requirements for flares; add maintenance vent requirements; revise requirements for adsorber monitoring; exclude the relief valve discharge exemption such that any relief valve discharge to the atmosphere of a vent stream is a violation of the emissions standard; and prohibit an owner or operator from bypassing the control device at any time, and to report any such violation. This information is being collected to assure compliance with 40 CFR Part 60, Subpart IIIa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records with the exception of the standard site procedures used to

deinventory equipment for safety purposes, which must be retained for at least five years. 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. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that 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.

There will be approximately 6 affected facilities over the three-year period covered by this ICR, which are owned and operated by the SOCOMI industry. None of the 6 facilities in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

Based on our consultations with industry representatives, there will be 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 6 new respondents will become subject to the standard. Because this rule applies to facilities for which construction, modification or reconstruction is commenced after the date of proposal, there are no existing respondents subject to the standard.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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, VOC emissions from Air Oxidation Unit Processes in the SOCOMI cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart III. This ICR reflects the burden associated with the proposed 40 CFR Part IIIa to reflect new requirements as a result of the CAA 111 review of 40 CFR Part 60, Subpart III.

## **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the 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 the emission standards. Continuous emission monitors are used to ensure compliance with the 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 the 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 the standards are being met. The performance test may also be observed.

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

Additionally, the EPA is proposing electronic reporting for certain notifications or reports. The EPA is proposing that owners or operators of affected sources would submit electronic copies of results of performance tests required in 40 CFR 60.615a(b) initial and semiannual reports required in 40 CFR 60.615a(h) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA would develop a template for the reporting form in CEDRI specifically for 40 CFR Part 60, Subpart IIIa.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also proposing that 40 CFR Part 60, Subpart IIIa performance test reports be submitted through the EPA's ERT.

### **3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart IIIa.

#### **3(a) Nonduplication**

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 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**

A public notice and solicitation of public comment on this collection is provided in the Federal Register notice of the proposed rulemaking published for the New Source Performance Standards for VOC from Air Oxidation Unit Processes in the SOCFI (40 CFR Part 60, Subpart IIIa).

#### **3(c) Consultations**

The public will be provided the opportunity to review and comment on the burden

estimated in this Information Collection Request during the comment period for the proposed rulemaking.

### **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.

### **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 (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 proposed recordkeeping and reporting requirements include the SOCFI source category. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards are SIC codes beginning with 28 which correspond to the North American Industry Classification System (NAICS) beginning with 325 for chemical manufacturing.

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the New Source Performance Standards (NSPS) for VOC from Air Oxidation Unit Processes in the SOCOMI (40 CFR Part 60, Subpart IIIa).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction/modification	§60.7(a)(1)
Notification of initial startup and compliance provisions	§60.7(a)(3), §60.615a(a)
Notification of change in compliance provisions	§60.615a(a)
Notification of event that may cause or has caused a delay in reporting	§60.615a(j)
Notification of a change in operating limit	§60.613a(a)(2)

<b>Reports</b>	
Initial performance tests (electronic submission)	§60.8
Performance test reports (electronic submission)	§60.615a(b)
Reports of exceedances and deviations	§60.615a(h)

A source must keep the following records:

<b>Recordkeeping</b>	
For non-flare control device or recovery system, records of the data measured during each performance test to show compliance with the TOC emission limit	§60.615a(b)
For non-flare control device or recovery system, records of periods of operation during which the operating parameter limits established during the most recent performance test are exceeded	§60.615a(c)
Continuous records of flow indication and periods when the vent stream is diverted from the control device or recovery device or has no flow rate	§60.615a(d)
Record of all periods of operation of the boiler or process heater	§60.615a(e)
Records of visible emission readings, heat content determinations, flow	§60.615a(f)

<b>Recordkeeping</b>	
rate measurements, exit velocity determinations, and periods when the pilot flame or flare flame is absent	
Records for maintenance vent openings	§60.615a(g)

### 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 will significantly reduce the burden associated with monitoring and recordkeeping at a plant site.

Respondents would be required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents would be required to submit electronic copies of notifications and certain reports through EPA’s CEDRI. The semiannual reports are to be created using Form [XXXX-XXX], the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there will be no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

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 CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>	
Familiarization with the regulatory requirements.	
Install, calibrate, maintain, and operate CPMS for temperature, gas flow, exit specific gravity, total regeneration stream mass or volumetric flow, breakthrough, pH of scrubber effluent,	

<b>Respondent Activities</b>
and/or scrubber liquid and gas flow rates for non-flare control devices or recovery devices.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C, or 2D; 3; and 18 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
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**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 two years.

### **5(c) Small Entity Flexibility**

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the 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 in Attachment 1 in Tables 1 through 3: Annual Respondent Burden and Cost – Review of the New Source Performance Standards for VOC from Air Oxidation Unit Processes in the SOCOMI (40 CFR Part 60, Subpart IIIa) (Proposed Rule) for the first three years of the information collection.

## **6. Estimating the Burden and Cost of the Collection**

Tables 1 through 4 in Attachment 1 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subparts 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 not conduct or 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 275 (Average Labor Hours from Table 4 in Attachment 1 of this document). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR for 40 CFR Part 60, Subpart III, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$161.34
Technical	\$101.24
Clerical	\$45.17

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2021, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 - Chemical Manufacturing. These rates have been adjusted using a Fringe Benefit Loading Rate of 1.5 and an Overhead and Profit Rate of 1.4 (Mean Hourly Rate \* Fringe Benefit Loading Rate \* Overhead and Profit Rate = Loaded Rate) 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 the regulation. 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**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device <sup>a</sup>	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents <sup>a, b</sup>	(D) Total Capital/Startup Cost, (B X C) <sup>a</sup>	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M <sup>a, b</sup>	(G) Total O&M, (E X F)
Flare monitoring requirements	\$3,752,223	0.63	\$2,369,825	\$789,173	1.89	\$1,495,275
Maintenance vent requirements	N/A	N/A	N/A	\$455	5.68	\$2,588
Non-flare control of vent streams	\$39,277	0.74	\$28,941	\$98,429	2.21	\$217,580
Carbon cannisters	\$26,500	0.21	\$5,579	\$2,500	0.63	\$1,579
H2 Analyzer	\$46,274	0.11	\$4,871	\$29,581	0.32	\$9,341
Calorimeter	\$134,967	0.11	\$14,207	\$37,115	0.32	\$11,721
Flare Gas Flow Monitor	\$565,578	0.11	\$59,535	\$97,733	0.32	\$30,863
Steam Controls/Flow Monitor	\$879,215	0.11	\$92,549	\$150,221	0.32	\$47,438
Avg. NG Cost per Flare to Meet NHVcz	\$0	0.11	\$0	\$110,031	0.32	\$34,747
Steam Cost Savings per Flare to Meet NHVcz	\$0	0.11	\$0	-\$62,117.19	0.32	-\$19,615.95
<b>Total <sup>c</sup></b>			<b>\$2,580,000</b>			<b>\$1,830,000</b>

<sup>a</sup> Costs are shown in 2021 \$. Respondent counts and monitoring and control requirements are based on the memorandum from Eastern Research Group, Inc. to EPA titled "CAA 111(b)(1)(B) review for the SOCMi air oxidation unit processes, distillation operations, and reactor processes NSPS subparts III, NNN, and RRR," March 2023, EPA-HQ-OAR-2022-0730.

<sup>b</sup> Number of respondents is based on 19 new sources becoming subject to 40 CFR Part 60, Subparts IIIa, NNNa, or RRRa during the three-year period of this ICR. We have assumed that 6 of the 19 will be subject to Subpart IIIa and have adjusted the respondent counts for capital/startup costs by a factor of approximately 0.1053 ( $2/19 = 0.1053$ ) to apportion the capital and O&M estimates for sources subject to IIIa (approximately 2 new sources per year for the three-year period of this ICR). We have adjusted the annual O&M costs by a factor of approximately 0.3158 ( $6/19 = 0.3158$ ) to apportion the costs to the 6 sources that will be subject to Subpart IIIa. The burden and costs for Subparts NNNa and RRRa are accounted for separately under EPA ICR Numbers 2757.01 and 2759.01.

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

The total capital/startup costs for this ICR are \$2,580,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,830,000. 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 \$3,800,000. These are 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. EPA's overall compliance and enforcement program includes activities such 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 \$2,760.

This cost is based on the average hourly labor rate as follows:

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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. Details upon which this estimate is based appear in Tables 5 through 8 of Attachment 1.

### **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, no existing respondents will be subject to the standard. It is estimated that two new respondents per year will become subject, or an overall total of six new respondents during the three-year period of this ICR. The overall average number of respondents, as shown in the table below, is four per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	2	0	0	0	2
2	2	2	0	0	4
3	2	4	0	0	6
Average	2	2			4

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. We have assumed that there will be 6 new respondents over the three-year period of this ICR. We have assumed that on average, there will be 2 new respondents per year.

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 four.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents <sup>1</sup>	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial performance test report	2	1	0	2
Repeat performance test report	0.4	1	0	0.4
Notification of construction/modification	2	1	0	2
Notification of actual startup	2	1	0	2
Notification of initial/repeat performance test	2	1	0	2.4
Semiannual report	4	2	0	8
			<b>Total (rounded)</b>	<b>17</b>

<sup>1</sup> Assumes no existing respondents and a total of 6 new respondents will become subject to the standard during the three-year period of this ICR, two new respondents per year. Assumes two new respondents per year will submit initial notifications and initial test reports and an overall average of four respondents per year will submit semiannual reports.

The number of Total Annual Responses is 17.

The total annual average labor costs are \$27,200 per year. Details regarding these estimates may be found in Attachment 1 in Tables 1 through 4.

### **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 Attachment 1 in Tables 1 through 4 and 5 through 8, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual average labor hours are 275 per year. Details regarding these estimates may be found in Tables 1 through 4.

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 16 hours per response.

The average annual capital/startup and O&M costs to the regulated entity are \$3,800,000 per year. 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 55 labor hours at a cost of \$2,760 per year. See Tables 5 through 8.

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**

Since this is a proposed rule, there is no change in burden.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to 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 not conduct or 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-2022-0730. 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), EPA 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) 566-1927. 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-2022-0730 and OMB Control Number 2060-NEW in any correspondence.

## **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Attachment 1**

**Refer to the Excel workbook that corresponds to this Supporting Statement.**



**Appendix A – Draft Electronic Reporting Template  
(see Docket ID Number EPA-HQ-OAR-2022-0730)**