SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

Risk and Technology Review of the Hazardous Organic National Emission Standards for Hazardous Air Pollutants (HON) (40 CFR Part 63, Subparts F, G, H, and I) (Proposed Rule)

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Risk and Technology Review of the Hazardous Organic National Emission Standards for Hazardous Air Pollutants (HON) (40 CFR Part 63, Subparts F, G, H, and I) (Proposed Rule), EPA ICR Number 2753.01, OMB Control Number 2060-NEW.

1(b) Short Characterization/Abstract

This supporting statement addresses information collection activities that will be imposed by proposed amendments to the National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (HON), 40 CFR Part 63, Subparts F, G, H, and I. The MACT standards for the Hazardous Organic NESHAP (HON) were originally proposed on December 31, 1992 and promulgated on April 22, 1994. Subpart F was most-recently amended on April 20, 2006. Subpart G was most-recently amended on February 27, 2014 to allow the use of Method 316 or Method 8260B in the SW-846 Compendium of Methods to determine HAP concentrations in wastewater streams. Subpart H was most-recently amended on December 22, 2008. Subpart I was most-recently amended on June 23, 2003. The HON standards apply to chemical manufacturing process units (CMPU's) in the SOCMI that manufacture as a primary product one or more of the chemicals listed in Table 1 of 40 CFR Part 63, Subpart F; use as a reactant or manufacture as a product, by-product, or co-product, one or more of the organic HAPs listed in Table 2 of Subpart F; and are located at a plant site that is a major source as defined in section 112(a) of the Act. Additionally, styrene-butadiene rubber production, pesticide production, polybutadiene production, chlorinated hydrocarbon use in the production of chemicals, pharmaceutical production, and miscellaneous butadiene use are subject to the negotiated regulations affecting equipment leaks promulgated under Subpart I. The emission points include transfer racks, storage tanks, wastewater systems, process vents and equipment leaks. These regulations apply to existing sources, as well as for new sources either commencing construction or reconstruction after the date of proposal. Hazardous air pollutants are the pollutants regulated under these subparts.

As part of a residual risk and technology review for the NESHAP, the Environmental Protection Agency (EPA) is proposing amendments to the HON that revise provisions pertaining to emissions from flares, PRDs, process vents, storage vessels, pressure vessels, storage vessel degassing, heat exchange systems, maintenance vents, wastewater, and equipment leaks. The EPA is also proposing to add requirements pertaining to EtO emissions from flares, process vents, storage vessels, heat exchange systems, equipment leaks, and wastewater; and dioxins and furans emissions from process vents. In addition, the EPA is proposing amendments to the HON

that revise provisions pertaining to emissions during periods of SSM, add requirements for electronic reporting of periodic reports and performance test results, fenceline monitoring, carbon adsorbers, and bypass monitoring, and make other minor clarifications and corrections. This information will be collected to assure compliance with the HON. This information collection request documents the recordkeeping and reporting requirements and burden imposed only by these proposed amendments. The burden from the existing rule requirements is accounted for in EPA ICR number 1854.11.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance and are required of all affected facilities subject to NESHAP. This information collection request (ICR) includes the burden for all activities that will be conducted in the first three years following promulgation of the proposed amendments to the HON. These activities include reading the rule, installing and maintaining monitors, and completing the recordkeeping and reporting requirements.

Any owner/operator subject to the provisions of this part shall maintain a file of these notifications, reports, and records, and retain the file for at least five years. All reports are sent to the delegated state or local authority. In the event there is no such delegated authority, the reports are sent directly to the EPA regional office. 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.

Over the next three years, 209 HON facilities will be subject to this standard, and the total labor, capital, and operations and maintenance costs imposed by the amendments will be approximately $70.9 million per year for the first 3 years after the proposed amendments are finalized. The burden to the respondents from each facility is shown in Tables 1 through 4 in Attachment 1.

The total average annual cost to the Designated Administrator during the 3 years of the ICR is estimated to be $293,000 per year. This burden includes labor costs for the Federal EPA and state and local authorities to implement the requirements in the NESHAP after the proposed amendments are finalized. This burden is shown in Tables 5 through 8 of Attachment 1.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under CAA Section 112, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and require the maximum degree of emission reduction. In addition, CAA 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 synthetic organic chemical manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for major sources in this source category at 40 CFR Part 63, Subparts F, G, H, and I.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting information will be used by Designated Administrators to 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 standard. Continuous emission monitors, along with the other required monitors, are used to ensure compliance with the standards at all times.

The required notifications are used to inform the Designated Administrator when a source becomes subject to the requirement of the regulations. The reviewing authority may then inspect the source to ensure that monitors are properly installed and operated and the standards are being met.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting will be required under 40 CFR Part 63, Subparts F, G, H, and I.

3(a) Nonduplication

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 similar 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, no duplication exists.

3(b) Public notice 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 HON.

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 Data Collection

The HON requires continuous monitoring and semiannual compliance reports. These periodic reports are essential to enforcement of the standards and detection of violations. The ongoing recordkeeping requirements also ensure that monitoring equipment is properly maintained and enhances the reliability of the data that is gathered for this collection.

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.

The HON requires owners or operators of facilities to keep and maintain records for a period of five years. The Title V permit programs also require records to be retained for five years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

3(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in 40 CFR 2, subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 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/NAICS Codes

The respondents to the proposed recordkeeping and reporting requirements include the SOCMI 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 data that are recorded or reported is required by the HON (40 CFR, Part 63, Subparts F, G, H, and I). The tables below reflect the proposed amendments.

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	§§63.5, 63.9, 63.100, 63.151, 63.182, and 63.192
Notification of anticipated date of initial startup	§§63.5, 63.9, 63.151, 63.182, and 63.192
Notification of actual date of initial startup	§§63.9, 63.151, 63.182, and 63.192
Notification of process changes	§§63.100, 63.118, 63.146, 63.151, 63.152, 63.182, and 63.190
Notification of performance test	§63.103
Notification for storage tanks	§63.190
Notification of change in applicability for flexible operation units	§63.100(d)(3)(iv)(C)(3)

Reports	
Initial report requirements	§§63.117, 63.122, 63.129, 63.146, 63.151, 63.182, and 63.192
Reporting of operating parameter levels	§§63.117, 63.120, 63.122, 63.129, 63.130, 63.146, 63.151, 63.182, and 63.192
Statement of compliance/noncompliance	§§63.117, 63.120, 63.122, 63.127, 63.128, 63.129, 63.146, 63.151, 63.152, 63.182, and 63.192

Reports	
Exceedance of parameter boundaries established during the most recent performance test	§§63.118, 63.122, 63.130, 63.146, 63.148, 63.151, 63.152, 63.182, and 63.192
Any change in equipment or process operation that increases emission levels above requirements in the standard	§§63.103, 63.104, 63.122, 63.130, 63.146, 63.148, 63.151, 63.152, 63.182, and 63.192
Written report of performance tests	§§63.117, 63.120, 63.122, 63.129, 63.146, 63.151, 63.152, 63.182, and 63.192
Delay of repair	§§63.104, 63.146, 63.182, 63.184, and 63.192
Fenceline monitoring site-specific monitoring plan	§63.184
Fenceline monitoring corrective action plan	§63.184
Fenceline monitoring quarterly reports	§63.184

A source must keep the following records:

Recordkeeping	
General Recordkeeping	§63.103
Record of data measured during each performance test	§§63.117, 63.118, 63.123, 63.129, 63.130, 63.147, 63.148, 63.151, 63.152, 63.181, and 63.192
Record of periods of operation during which the performance boundaries established in the Notification of Compliance Status are exceeded	§§63.118, 63.120, 63.123, 63.130, 63.147, 63.148, 63.151, and 63.152
Records of Monthly visual inspections	§§63.118, 63.130, 63.147, 63.148, 63.181, and 63.192
Records of Annual visual inspections	§§63.123, 63.147, 63.148, 63.181 and 63.192
HEX El Paso monitoring and delay of repair	§63.104
Flare design, monitoring, visible emissions, composition, and root cause analysis	§63.108
Quantity of EtO sent to flares	§63.108(p)

Recordkeeping	
Quantity of EtO sent to maintenance vents	§63.113
Dioxin/Furans concentration	§63.117
Process vent & storage vessel monitoring records	§§63.114, 63.118, and §63.123
Adsorber and condenser parameter monitoring	§§63.117, 63.123, 63.127, and 63.147
Bypass lines	§§63.118, 63.130, 63.147
Records of process changes for process vents	§63.118
Process vents in EtO service	§63.118
Maintenance vent emissions	§63.118
Records of delay of repair	§§63.120 and §63.123
Record of storage vessel size	§63.123
Storage vessel degassing	§63.119
Pressure vessel monitoring	§63.122
Storage vessels in EtO service	§63.123
Record of vent system configuration for transfer racks	§63.129
Wastewater containing EtO concentrations and parameters (to determine Group status)	§63.132
Record of design criteria for equipment leaks	§63.118
Equipment in EtO service leak monitoring	§63.181
PRD management work practice standards	§63.181
Records of continuous monitoring systems	§63.103

Recordkeeping	
Fenceline monitoring meteorological and sampling data	§63.184

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.

As part of the proposed amendment, 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 notification is an upload of their currently required notification in portable document format (PDF) file. The quarterly, semiannual, and annual 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 quarterly, semiannual, and annual 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

Respondent Activities
Read instructions.
Acquire, install, and operate monitoring devices for flares, PRDs, heat exchangers, and storage tanks (scrubbers).
Develop a flare management plan and maintenance vent opening procedures.
Conduct performance tests, if applicable.

Respondent Activities
Adjust the existing ways to comply with any previously applicable instruction and requirements.
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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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.

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 Enforcement and Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS).

5(b) Collection Methodology and Management

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. ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 five 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

Upon promulgation of the amendments, owners or operators of HON facilities have up to three years to comply with the reporting and recordkeeping requirements associated with the amendments for heat exchange systems, flares, PRDs, bypass lines, storage tank degassing, and maintenance vents. Most facilities are expected to use the full three years to comply with the general HON requirements, but it was assumed that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. HON facilities with ethylene oxide emission sources (storage tanks, process vents, and equipment leaks) must be in compliance within two years of the rule's promulgation for these ethylene oxide emission sources and it was assumed that all would comply in year 2. Revised monitoring for HON equipment leaks begins within one year of the rule's promulgation. It is anticipated facilities will read the rule and perform certain one-time activities (e.g., develop a flare management plan) in year 1. The specific frequency for each information collection activity within this request is shown in Tables 1 through 3 of Attachment 1.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Tables 1 through 4 of Attachment 1 present an itemization of the burden on the respondents subject to this NESHAP for the recordkeeping and reporting requirements in the first three years following promulgation of the amendments to the HON. Tables 5 through 8 of Attachment 1 present a summary of the burden on the Federal EPA and state and local authorities in the first three years following promulgation of the amendments to the HON.

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 83,600 hours. The average annual recordkeeping hours are 70,300 and the reporting requirement hours are 13,300, both of which are shown in Table 4 of Attachment 1. These hours are based on review of background documents in development of the amendments to this NESHAP, Agency knowledge and experience with the NESHAP program, and related ICRs.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 1. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) costs.

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$161.34 ($76.83 + 110%)
Technical	$101.24 ($48.21 + 110%)
Clerical	$45.17 ($21.51 + 110%)

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/Start-up and Operation and Maintenance Costs

In addition to the labor costs mentioned above, industry costs associated with the information collection activities in the HON include capital/start-up costs and operation and maintenance costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include the installation of monitors. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and complete performance evaluations, as well as other costs such as photocopying and postage.

(iii) Capital/Startup and Operation and Maintenance (O&M) Costs

Below are the estimated capital and startup costs and O&M costs for the respondents subject to the HON for the first three years after promulgation of the amendments. Note, capital and O&M costs are not applicable for the amendments to equipment leaks, maintenance vents, and bypass lines.

Capital/Startup and O&M Costs (2021$)						
(A) Unit Type	(B) Capital/Startup Costs for One Respondent	(C) Number of Respondents with Capital/Startup Costs	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Cost (O&M and Capital) for One Respondent	(F) Number of Respondents[a]	(G) Total Annual Cost (Over 3-Yr Period) (E X F)
Flare Monitors	$1,560,881	209	$326,224,129	$296,308	209	$61,928,372
PRD Work Practice & Monitors	$81,353	209	$17,002,777	$36,101	209	$7,545,109
Heat Exchangers - El Paso Monitors & Repair	$3,720	209	$777,480	$1,102	209	$230,318
Carbon Adsorber Monitors & Performance Test [b]	$16,250	2	$32,500	$1,750	2	$3,500
Pressure Vessel Monitors	$372	209	$77,748	$349	209	$72,941
Storage Vessel Planned Routine Maintenance	$12,619	209	$2,637,371	$2,184	209	$456,456
Dioxin/Furan Monitors & Performance Test [c]	$560,000	21	$11,760,000	$325,000	21	$6,825,000
Fenceline Monitoring [d]	$77,409	126	$9,753,534	$254,405	126	$32,055,030
Process Vent TRE and Maintenance Vent Requirements	$39,277	209	$8,208,893	$98,884	209	$20,666,756
Ethylene Oxide Heat Exchangers - El Paso Method Monitors and Repair [e]	$14,417	3	$43,250	$62,931	3	$188,792
Ethylene Oxide Equipment Leaks Monitors [e]	$10,435	17	$177,392	$207,825	17	$3,533,021
Ethylene Oxide Process Vents & Storage Tanks - Control Device [e]	$1,457,857	7	$10,205,000	$753,714	7	$5,276,000
Ethylene Oxide Process Vents & Storage Tanks - Control Device Monitor [e]	$23,200	7	$162,400	$4,900	7	$34,300
Ethylene Oxide Process Vents & Storage Tanks - Control Device Testing[e]	$38,302	7	$268,114	$0	7	NA
TOTAL			**$387,330,588**			**$138,815,595**

a. Within a given year, there are a maximum of 209 respondents per information collection activity.
b. We estimate 2 respondents operate carbon adsorbers.
c. We estimate 21 respondents operate facilities that produce chlorinated compounds.
d. We estimate 126 respondents will be required to conduct fenceline monitoring.
e. We estimate there are a maximum of 17 respondents that operate equipment in ethylene oxide service.

The total capital/startup costs for this ICR are $387 million; this is the total of column D.

The total annual costs for this ICR are $139 million; this is the total of column G. This includes O&M and annualized capital costs.

6(c) Estimating Agency Burden and Cost

The costs to the Agency are those costs associated with analysis of the reported information. The Agency'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 $293,000.

This cost is based on the average hourly labor rates 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 on the line item estimates used to calculate these burdens are presented in Tables 5 through 8 of Attachment 1.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The total number of respondents is also referred to as the respondent universe. Based on research conducted for the residual risk and technology reviews of the HON, 209 facilities (of which, 17 facilities have ethylene oxide emission sources) are currently operating and subject to the standards. It was assumed that one-third of the facilities would begin complying with the amendments for heat exchange systems, flares, PRDs, process vents, storage vessels, carbon adsorbers, bypass lines, maintenance vents, equipment leaks, and wastewater. in year 2 and the remaining two-thirds of the facilities would begin complying in year 3. All 17 facilities with ethylene oxide emission sources would begin complying with the amendments for storage tanks, process vents, heat exchange systems, equipment leaks, and wastewater in year 2. All 126 facilities required to conduct fenceline monitoring would begin complying with requirements in year 2 and submit corrective action plans in year 3.

The total number of annual responses 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	(E) Total Annual Responses

			Keep Records But Do Not Submit Reports	(Over 3-Yr Period) E=(BxC)+D
Notification of Compliance Status				
Flares	209	1	0	209
PRDs	209	1	0	209
Process Vents	209	1	0	209
Storage Vessels	209	1	0	209
Carbon Adsorbers	2	1	0	2
Ethylene Oxide Wastewater Group 1	17	1	0	17
Ethylene Oxide Process Vents & Storage Tanks	7	1	0	7
Ethylene Oxide Equipment Leaks	17	1	0	17
Periodic Reports				
Flares	209	2	0	418
PRDs	209	2	0	418
Maintenance Vents	209	2	0	418
Bypass Lines	0	2	0	0
HEX El Paso Method	209	2	0	418
Storage Vessel Routine Maintenance	209	2	0	418
Carbon Adsorbers	2	2	0	4
Pressure Vessels	209	2	0	418
Ethylene Oxide Wastewater Group 1	17	2	0	34
Ethylene Oxide Process Vents & Storage Tanks	7	2	0	14
Ethylene Oxide Equipment Leaks	17	2	0	34
Fenceline Monitoring				
Site-specific monitoring plan	126	1	0	126
Corrective action plan	126	1	0	126
Quarterly reports	126	4	0	504
TOTAL				**4,229**

The number of total annual responses is 4,229 over the first three years after finalizing the amendments.

6(e) Bottom Line Burden Hours and Cost Tables

(i) The Respondent Tally

The total annual labor hours for respondents are 83,600 at a cost of $8.27 million. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1.

The total annual capital/startup and O&M costs to the regulated entity are $62.7 million. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance Costs.

(ii) The Agency Tally

The average annual burden over the first three years for the Agency is estimated to be 5,494 hours at a cost of $293,000. The Agency burden hours and costs are presented in Tables 5 through 8 of Attachment 1.

6(f) Reasons for change in burden

There is no change in the labor hours or cost in this ICR as it presents the burden based on the amendments to the HON and is considered new burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be 20 hours per response. Burden means 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 currently valid OMB control number. The OMB Control Numbers for EPA regulations are listed in 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, the 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. 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 section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

TABLES 1, 2, 3, 4, 5, 6, 7, and 8
Refer to the Excel workbook that corresponds to this Supporting Statement.