

**ATTACHMENT  
SUPPORTING STATEMENT**

**Review of the NESHAP for Epoxy Resin and Non-Nylon Polyamide**

**TABLES 1, 2, and 3**

Annual Respondent Burden and Cost of the Review of the NESHAP for Epoxy Resin and Non-

**TABLE 4**

Summary of Annual Respondent Burden and Cost of the Review of the NESHAP for Epoxy Resin

**TABLES 5, 6, and 7**

Annual Agency Burden and Cost of the Review of the Review of the NESHAP for Epoxy Resin

**TABLE 8**

Summary of Annual Agency Burden and Cost of the Review of the Review of the NESHAP for

**NT 1**

**CEMENT**

**Production (40 CFR Part 63, Subpart W) (Proposed Rule)**

-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule) - Years 1-3

Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule)

Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule) - Years

for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule)

1-3

Rule)

**Table 1: Annual Respondent Burden and Cost Year 1 – Review of the NESHAP for Epoxy F Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	8	1
B. Required activities <sup>c</sup>		
Basic liquid resins (BLR)	1,050	1
Repeat initial performance test - process vents	1,050	1
Initial performance test - wastewater	270	1
Repeat initial performance test – wastewater	270	1
Wet strength resins (WSR) <sup>d</sup>	270	1
C. Create information	See 3B, 4D, 4E	
D. Gather existing information	See 3B, 4D, 4E	
E. Write report		
Notification of construction/reconstruction <sup>c</sup>	2	1
Notification of physical/operational changes <sup>e</sup>	2	1
Notification of anticipated startup <sup>c</sup>	2	1
Notification of actual startup <sup>c</sup>	2	1
Notification of applicability of the standard – existing sources <sup>c</sup>	2	1
Notification of applicability of the standard – new sources <sup>c</sup>	2	1
Notification of initial performance test <sup>c</sup>	2	1
Report of initial test (including CMS performance evaluation and results) <sup>c</sup>	6	1
Submit quality control plan for CMS <sup>c, f</sup>	2	1
Submit startup, shutdown, malfunction plan <sup>c</sup>	2	1
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	16	4
Report of no excess emissions <sup>h</sup>	8	4
Report of area source becoming major <sup>i</sup>	6	1
Waiver application <sup>j</sup>	6	1
Compliance status information report <sup>c</sup>	4	1
Submit semiannual SSM reports <sup>k</sup>	2	2
Submit immediate reports of inconsistent procedures monitored at each affected source <sup>h</sup>	2	1
Submit a CMS summary report for HAP monitored at each affected source <sup>l</sup>	2	1
<b>Subtotal for Reporting Requirements</b>		
4. Recordkeeping requirements		
A. Familiarization with the regulatory requirements a	See 3A	
B. Plan activities	N/A	
C. Implement activities	See 4D, 4E	

D. Develop record system <sup>c</sup>	40	1
E. Time to enter information		
a. Records of control device monitoring parameters:		
- Continuously monitored parameters <sup>l,m</sup>	12	52
- LDAR program reporting and recordkeeping – BLR <sup>l</sup>	311	1
- LDAR program reporting and recordkeeping – WSR <sup>n</sup>	11	1
- Wastewater parameters <sup>l,o</sup>	2	12
- Records of operating parameters to meet D/F emission limit	1	52
b. Record Information:		
- Maintenance Vents	1	1
- Pressure Relief Device - Releases to Atmosphere <sup>r</sup>	1	1
- Heat Exchange System Recordkeeping	1	1
F. Other recordkeeping activities		
a. Maintain records of occurrence and duration of each SSM of process and control equipment <sup>b,p</sup>	2	8
b. Maintain records of maintenance performed on air pollution control equipment <sup>b</sup>	2	4
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan <sup>b,q</sup>	2	1
d. Maintain records of each period during which a CMS is malfunctioning or inoperative <sup>l</sup>	2	1
e. Maintain records of result of all performance test and performance evaluations <sup>c</sup>	2	1
f. Maintain all initial notification and compliance status notifications <sup>c</sup>	1	1
G. Time for audits	N/A	
H. Time to train personnel	8	1
<b>Subtotal for Recordkeeping Requirements</b>		
<b>Total Labor Burden and Costs (rounded) <sup>s</sup></b>		
<b>Total Capital and O&amp;M Cost (rounded) <sup>s</sup></b>		
<b>Grand Total (rounded) <sup>s</sup></b>		

Assumptions:

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no add assume that each respondent will have to familiarize with the regulatory requirements each year. We have assumed th anticipated facilities will read the rule in year 1.

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$161.34 for managerial, \$101.24 for technical. Statistics, May 2021, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000. Overhead and Profit Rate of 1.4 (Mean Hourly Rate \* Fringe Benefit Loading Rate \* Overhead and Profit Rate = Loa workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping

<sup>c</sup> We have assumed that this is a one-time-only cost. Records for one-time reporting activities must only be retained f

<sup>d</sup> For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, stora H - leak detection and repair program for equipment leaks. Because it is more cost effective, we have assumed that al the continuous monitoring systems (CMS) installed. Note that this item is not included in the incremental burden pres

<sup>e</sup> We have assumed that no facilities will have a physical or operational change.

- <sup>f</sup> We have assumed that it will require one test each for wastewater and process vents. Note that this item is not included.
- <sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden.
- <sup>h</sup> We have assumed that there are five sources that are subject to this regulation, so the number of sources without excess emissions is five.
- <sup>i</sup> We have assumed that no area sources are expected to become major sources.
- <sup>j</sup> We have assumed that one facility will require a waiver. Note that this item is not included in the incremental burden. Amendments will remove the SSM exemption and the requirement to submit SSM reports will no longer apply three years after publication of the final rule.
- <sup>k</sup> We have assumed that there are three basic liquid resins (BLR) manufacturing facilities. Note that this item is not included in the incremental burden.
- <sup>m</sup> We have assumed that these parameters will automatically be recorded with a data logger.
- <sup>n</sup> We have assumed that there are four WSR facilities subject to the rule. Note that this item is not included in the incremental burden.
- <sup>o</sup> We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.
- <sup>p</sup> We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility. Note that this item is not included in the incremental burden. SSM requirements will no longer apply three years after publication of the final rule. We have not included additional burden for SSM requirements.
- <sup>q</sup> We have assumed that it will take two hours once per year for each facility to maintain records for one deviation from requirements. Note that this item is not included in the incremental burden. SSM requirements will no longer apply three years after publication of the final rule. We have not included additional burden for SSM requirements.
- <sup>r</sup> We have assumed that no respondents will have a relief valve discharge to the atmosphere during the three-year period.
- <sup>s</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed**

(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
8	5	40	2.0	4	\$4,553
1,050	0	0	0	0	\$0
1,050	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
6	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
64	0	0	0	0	\$0
32	0	0	0	0	\$0
6	0	0	0	0	\$0
6	0	0	0	0	\$0
4	0	0	0	0	\$0
4	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
			<b>46</b>		<b>\$4,553</b>

40	0	0	0	0	\$0
624	0	0	0	0	\$0
311	0	0	0	0	\$0
11	0	0	0	0	\$0
24	0	0	0	0	\$0
52	0	0	0	0	\$0
1	0	0	0	0	\$0
1	0	0	0	0	\$0
1	0	0	0	0	\$0
16	0	0	0	0	\$0
8	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
1	0	0	0	0	\$0
8	0	0	0	0	\$0
			<b>0</b>		<b>\$0</b>
			<b>46</b>		<b>\$4,550</b>
					<b>\$0</b>
					<b>\$4,550</b>

Additional new sources per year that will become subject to the rule over the three-year period of this ICR. We estimate that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is

estimated that the cost of compliance for these facilities will be \$45.17 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics - Chemical Manufacturing. These rates have been adjusted using a Fringe Benefit Loading Rate of 1.5 and an Adjusted Rate) to account for varying industry wage rates and the additional overhead business costs of employing their employees.

for five years. The five year period after these initial activities precedes the period covered by this ICR renewal.

For air emissions, stormwater, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart E. All WSR facilities will choose to comply with the alternative standard. These facilities are not required to have been included in this ICR.



ded in the incremental burden presented in this ICR.

l burden presented in this ICR.

cess emissions report is four. Note that this item is not included in the incremental burden presented in this ICR.

n presented in this ICR.

years after publication of the final rule. We have not included additional burden for SSM requirements in the  
cluded in the incremental burden presented in this ICR.

remental burden presented in this ICR.

7. The proposed amendments will remove the SSM exemption and the SSM recordkeeping requirements will no  
ents in the incremental burden presented in this ICR.  
om SSM plans. The proposed amendments will remove the SSM exemption and the SSM recordkeeping  
len for SSM requirements in the incremental burden presented in this ICR.  
od of this ICR.

Labor Rates	
Management	\$161.34
Technical	\$101.24
Clerical	\$45.17

**Table 2: Annual Respondent Burden and Cost Year 2 – Review of the NESHAP for Epoxy F Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	1	1
B. Required activities <sup>c</sup>		
Basic liquid resins (BLR)	1,050	1
Repeat initial performance test - process vents	1,050	1
Initial performance test - wastewater	270	1
Repeat initial performance test – wastewater	270	1
Wet strength resins (WSR) <sup>d</sup>	270	1
C. Create information	See 3B, 4D, 4E	
D. Gather existing information	See 3B, 4D, 4E	
E. Write report		
Notification of construction/reconstruction <sup>c</sup>	2	1
Notification of physical/operational changes <sup>e</sup>	2	1
Notification of anticipated startup <sup>c</sup>	2	1
Notification of actual startup <sup>c</sup>	2	1
Notification of applicability of the standard – existing sources <sup>c</sup>	2	1
Notification of applicability of the standard – new sources <sup>c</sup>	2	1
Notification of initial performance test <sup>c</sup>	2	1
Report of initial test (including CMS performance evaluation and results) <sup>c</sup>	6	1
Submit quality control plan for CMS <sup>c,f</sup>	2	1
Submit startup, shutdown, malfunction plan <sup>c</sup>	2	1
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	16	4
Report of no excess emissions <sup>h</sup>	8	4
Report of area source becoming major <sup>i</sup>	6	1
Waiver application <sup>j</sup>	6	1
Compliance status information report <sup>c</sup>	4	1
Submit semiannual SSM reports <sup>k</sup>	2	2
Submit immediate reports of inconsistent procedures monitored at each affected source <sup>h</sup>	2	1
Submit a CMS summary report for HAP monitored at each affected source <sup>l</sup>	2	1
<b>Subtotal for Reporting Requirements</b>		
4. Recordkeeping requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	See 3A	
B. Plan activities	N/A	
C. Implement activities	See 4D, 4E	
D. Develop record system <sup>c</sup>	40	1
E. Time to enter information		
a. Records of control device monitoring parameters:		

- Continuously monitored parameters <sup>l,m</sup>	12	52
- LDAR program reporting and recordkeeping – BLR <sup>l</sup>	311	1
- LDAR program reporting and recordkeeping – WSR <sup>n</sup>	11	1
- Wastewater parameters <sup>l,o</sup>	2	12
- Records of operating parameters to meet D/F emission limit	1	52
b. Record Information:		
- Maintenance Vents	1	1
- Pressure Relief Device - Releases to Atmosphere <sup>r</sup>	1	1
- Heat Exchange System Recordkeeping	1	1
F. Other recordkeeping activities		
a. Maintain records of occurrence and duration of each SSM of process and control equipment <sup>h,p</sup>	2	8
b. Maintain records of maintenance performed on air pollution control equipment <sup>h</sup>	2	4
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan <sup>h,q</sup>	2	1
d. Maintain records of each period during which a CMS is malfunctioning or inoperative <sup>l</sup>	2	1
e. Maintain records of result of all performance test and performance evaluations <sup>c</sup>	2	1
f. Maintain all initial notification and compliance status notifications <sup>c</sup>	1	1
G. Time for audits	N/A	
H. Time to train personnel	8	1
<b>Subtotal for Recordkeeping Requirements</b>		
<b>Total Labor Burden and Costs (rounded) <sup>s</sup></b>		
<b>Total Capital and O&amp;M Cost (rounded) <sup>s</sup></b>		
<b>Grand Total (rounded) <sup>s</sup></b>		

Assumptions:

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no additional sources. We assume that each respondent will have to familiarize with the regulatory requirements each year. We have assumed that anticipated facilities will read the rule in year 1.

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$161.34 for managerial, \$101.24 for technical, and \$70.84 for non-managerial/technical. Statistics, May 2021, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000. Overhead and Profit Rate of 1.4 (Mean Hourly Rate \* Fringe Benefit Loading Rate \* Overhead and Profit Rate = Load). We have assumed that workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping.

<sup>c</sup> We have assumed that this is a one-time-only cost. Records for one-time reporting activities must only be retained for one year.

<sup>d</sup> For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, storage tanks, and H - leak detection and repair program for equipment leaks. Because it is more cost effective, we have assumed that all WSR facilities will have the continuous monitoring systems (CMS) installed. Note that this item is not included in the incremental burden pres

<sup>e</sup> We have assumed that no facilities will have a physical or operational change.

<sup>f</sup> We have assumed that it will require one test each for wastewater and process vents. Note that this item is not included in the incremental burden pres

<sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden pres

<sup>h</sup> We have assumed that there are five sources that are subject to this regulation, so the number of sources without excess emissions is four.

<sup>i</sup> We have assumed that no area sources are expected to become major sources.

<sup>j</sup> We have assumed that one facility will require a waiver. Note that this item is not included in the incremental burden pres. We have assumed that amendments will remove the SSM exemption and the requirement to submit SSM reports will no longer apply three years after the rule is promulgated.

- <sup>1</sup> We have assumed that there are three basic liquid resins (BLR) manufacturing facilities. Note that this item is not in
- <sup>m</sup> We have assumed that these parameters will automatically be recorded with a data logger.
- <sup>n</sup> We have assumed that there are four WSR facilities subject to the rule. Note that this item is not included in the inc
- <sup>o</sup> We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.
- <sup>p</sup> We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility
- <sup>q</sup> We have assumed that it will take two hours once per year for each facility to maintain records for one deviation fro
- <sup>r</sup> We have assumed that no respondents will have a relief valve discharge to the atmosphere during the three-year peri
- <sup>s</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed**

(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
1	5	5	0.3	0.5	\$569
1,050	0	0	0	0	\$0
1,050	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	2	4	0.2	0.4	\$455
6	2	12	0.6	1.2	\$1,366
2	0	0	0	0	\$0
2	0	0	0	0	\$0
64	0	0	0	0	\$0.00
32	0	0	0	0	\$0.00
6	0	0	0	0	\$0
6	0	0	0	0	\$0.00
4	2	8	0.4	0.8	\$911
4	0	0	0	0	\$0.00
2	0	0	0	0	\$0.00
2	0	0	0	0	\$0.00
			<b>33</b>		<b>\$3,301</b>
40	0	0	0	0	\$0

624	0	0	0	0	\$0.00
311	0	0	0	0	\$0.00
11	0	0	0	0	\$0.00
24	0	0	0	0	\$0.00
52	2	104	5.2	10.4	\$11,837.70
1	2	2	0.1	0.2	\$227.65
1	0	0	0	0	\$0.00
1	2	2	0.1	0.2	\$227.65
16	0	0	0	0	\$0.00
8	0	0	0	0	\$0.00
2	0	0	0	0	\$0.00
2	0	0	0	0	\$0.00
2	0	0	0	0	\$0
1	0	0	0	0	\$0
8	2	16	0.8	1.6	\$1,821
			<b>143</b>		<b>\$14,114</b>
			<b>176</b>		<b>\$17,400</b>
					<b>\$1,850,000</b>
					<b>\$1,870,000</b>

itional new sources per year that will become subject to the rule over the three-year period of this ICR. We at one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is

, and \$45.17 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor - Chemical Manufacturing. These rates have been adjusted using a Fringe Benefit Loading Rate of 1.5 and an (ded Rate) to account for varying industry wage rates and the additional overhead business costs of employing their employees.

for five years. The five year period after these initial activities precedes the period covered by this ICR renewal.

ge tanks, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart ll WSR facilities will choose to comply with the alternative standard. These facilities are not required to have sented in this ICR.

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cess emissions report is four. Note that this item is not included in the incremental burden presented in this ICR.

n presented in this ICR.

years after publication of the final rule. We have not included additional burden for SSM requirements in the





Labor Rates	
Management	\$161.34
Technical	\$101.24
Clerical	\$45.17

**Table 3: Annual Respondent Burden and Cost Year 3 – Review of the NESHAP for Epoxy F Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	1	1
B. Required activities <sup>c</sup>		
Basic liquid resins (BLR)	1,050	1
Repeat initial performance test - process vents	1,050	1
Initial performance test - wastewater	270	1
Repeat initial performance test – wastewater	270	1
Wet strength resins (WSR) <sup>d</sup>	270	1
C. Create information	See 3B, 4D, 4E	
D. Gather existing information	See 3B, 4D, 4E	
E. Write report		
Notification of construction/reconstruction <sup>c</sup>	2	1
Notification of physical/operational changes <sup>e</sup>	2	1
Notification of anticipated startup <sup>c</sup>	2	1
Notification of actual startup <sup>c</sup>	2	1
Notification of applicability of the standard – existing sources <sup>c</sup>	2	1
Notification of applicability of the standard – new sources <sup>c</sup>	2	1
Notification of initial performance test <sup>c</sup>	2	1
Report of initial test (including CMS performance evaluation and results) <sup>c</sup>	6	1
Submit quality control plan for CMS <sup>c, f</sup>	2	1
Submit startup, shutdown, malfunction plan <sup>c</sup>	2	1
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	16	4
Report of no excess emissions <sup>h</sup>	8	4
Report of area source becoming major <sup>i</sup>	6	1
Waiver application <sup>j</sup>	6	1
Compliance status information report <sup>c</sup>	4	1
Submit semiannual SSM reports <sup>k</sup>	2	2
Submit immediate reports of inconsistent procedures monitored at each affected source <sup>h</sup>	2	1
Submit a CMS summary report for HAP monitored at each affected source <sup>l</sup>	2	1
<b>Subtotal for Reporting Requirements</b>		
4. Recordkeeping requirements		
A. Familiarization with the regulatory requirements <sup>a</sup>	See 3A	
B. Plan activities	N/A	
C. Implement activities	See 4D, 4E	

D. Develop record system <sup>c</sup>	40	1
E. Time to enter information		
a. Records of control device monitoring parameters:		
- Continuously monitored parameters <sup>l,m</sup>	12	52
- LDAR program reporting and recordkeeping – BLR <sup>l</sup>	311	1
- LDAR program reporting and recordkeeping – WSR <sup>n</sup>	11	1
- Wastewater parameters <sup>l,o</sup>	2	12
- Records of operating parameters to meet D/F emission limit	1	52
b. Record Information:		
- Maintenance Vents	1	1
- Pressure Relief Device - Releases to Atmosphere <sup>r</sup>	1	1
- Heat Exchange System Recordkeeping	1	1
F. Other recordkeeping activities		
a. Maintain records of occurrence and duration of each SSM of process and control equipment <sup>b,p</sup>	2	8
b. Maintain records of maintenance performed on air pollution control equipment <sup>b</sup>	2	4
c. Maintain records of all action taken during periods of SSM that differ from the sources SSM plan <sup>b,q</sup>	2	1
d. Maintain records of each period during which a CMS is malfunctioning or inoperative <sup>l</sup>	2	1
e. Maintain records of result of all performance test and performance evaluations <sup>c</sup>	2	1
f. Maintain all initial notification and compliance status notifications <sup>c</sup>	1	1
G. Time for audits	N/A	
H. Time to train personnel	8	1
<b>Subtotal for Recordkeeping Requirements</b>		
<b>Total Labor Burden and Costs (rounded) <sup>s</sup></b>		
<b>Total Capital and O&amp;M Cost (rounded) <sup>s</sup></b>		
<b>Grand Total (rounded) <sup>s</sup></b>		

Assumptions:

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no add assume that each respondent will have to familiarize with the regulatory requirements each year. We have assumed th anticipated facilities will read the rule in year 1.

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$161.34 for managerial, \$101.24 for technical. Statistics, May 2021, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000. Overhead and Profit Rate of 1.4 (Mean Hourly Rate \* Fringe Benefit Loading Rate \* Overhead and Profit Rate = Loa workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping

<sup>c</sup> We have assumed that this is a one-time-only cost. Records for one-time reporting activities must only be retained f

<sup>d</sup> For all wet strength resins (WSR) facilities, as an alternative to implementing the standards for process vents, stora H - leak detection and repair program for equipment leaks. Because it is more cost effective, we have assumed that al the continuous monitoring systems (CMS) installed. Note that this item is not included in the incremental burden pres

<sup>e</sup> We have assumed that no facilities will have a physical or operational change.

- <sup>f</sup> We have assumed that it will require one test each for wastewater and process vents. Note that this item is not included in the incremental burden.
- <sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden.
- <sup>h</sup> We have assumed that there are five sources that are subject to this regulation, so the number of sources without excess emissions is five.
- <sup>i</sup> We have assumed that no area sources are expected to become major sources.
- <sup>j</sup> We have assumed that one facility will require a waiver. Note that this item is not included in the incremental burden.
- <sup>k</sup> We have assumed that it will take each respondent two hours to submit semiannual (SSM) reports. Also quarterly rule amendments will remove the SSM exemption and the requirement to submit SSM reports will no longer apply three years after publication of the final rule. We have not included additional burden for SSM requirements presented in this ICR.
- <sup>l</sup> We have assumed that there are three basic liquid resins (BLR) manufacturing facilities. Note that this item is not included in the incremental burden.
- <sup>m</sup> We have assumed that these parameters will automatically be recorded with a data logger.
- <sup>n</sup> We have assumed that there are four WSR facilities subject to the rule. Note that this item is not included in the incremental burden.
- <sup>o</sup> We have assumed that it will take two hours to record wastewater parameters during the monthly monitoring.
- <sup>p</sup> We have assumed that startup, shutdown, and/or malfunction (SSM) will occur eight times per year for each facility. We have not included additional burden for SSM requirements longer apply three years after publication of the final rule. We have not included additional burden for SSM requirements presented in this ICR.
- <sup>q</sup> We have assumed that it will take two hours once per year for each facility to maintain records for one deviation from requirements will no longer apply three years after publication of the final rule. We have not included additional burden for SSM requirements presented in this ICR.
- <sup>r</sup> We have assumed that no respondents will have a relief valve discharge to the atmosphere during the three-year period.
- <sup>s</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed**

(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
1	5	5	0.3	0.5	\$569
1,050	0	0	0	0	\$0
1,050	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
270	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	3	6	0.3	0.6	\$683
6	3	18	0.9	1.8	\$2,049
2	0	0	0	0	\$0
2	0	0	0	0	\$0
64	0	0	0	0	\$0.00
32	0	0	0	0	\$0.00
6	0	0	0	0	\$0
6	0	0	0	0	\$0.00
4	3	12	0.6	1.2	\$1,366
4	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
			<b>47</b>		<b>\$4,667</b>

40	0	0	0	0	\$0
624	0	0	0	0	\$0
311	0	0	0	0	\$0
11	0	0	0	0	\$0
24	0	0	0	0	\$0
52	5	260	13	26	\$29,594.24
1	5	5	0.25	0.5	\$569.12
1	0	0	0	0	\$0
1	5	5	0.25	0.5	\$569.12
16	0	0	0	0	\$0
8	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
1	0	0	0	0	\$0
8	3	24	1.2	2.4	\$2,732
			<b>338</b>		<b>\$33,464</b>
			<b>385</b>		<b>\$38,100</b>
					<b>\$3,440,000</b>
					<b>\$3,480,000</b>

Additional new sources per year that will become subject to the rule over the three-year period of this ICR. We estimate that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is

estimated that the cost of compliance for these facilities will be \$45.17 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics - Chemical Manufacturing. These rates have been adjusted using a Fringe Benefit Loading Rate of 1.5 and an Overhead Rate (added Rate) to account for varying industry wage rates and the additional overhead business costs of employing their employees.

for five years. The five year period after these initial activities precedes the period covered by this ICR renewal.

For large tanks, and wastewater, these facilities may elect to comply with the requirements of 40 CFR part 63, subpart I. All WSR facilities will choose to comply with the alternative standard. These facilities are not required to have been identified in this ICR.

ded in the incremental burden presented in this ICR.

l burden presented in this ICR.

cess emissions report is four. Note that this item is not included in the incremental burden presented in this ICR.

n presented in this ICR.

reporting may be reduced to semiannual reporting for sources that are in compliance for one year. The proposed years after publication of the final rule. We have not included additional burden for SSM requirements in the

cluded in the incremental burden presented in this ICR.

remental burden presented in this ICR.

7. The proposed amendments will remove the SSM exemption and the SSM recordkeeping requirements will no ents in the incremental burden presented in this ICR.

om SSM plans. The proposed amendments will remove the SSM exemption and the SSM recordkeeping en for SSM requirements in the incremental burden presented in this ICR.

od of this ICR.

Labor Rates	
Management	\$161.34
Technical	\$101.24
Clerical	\$45.17



**Table 4: Summary of Annual Respondent Burden and Cost – Review of the NESHAP for Epc  
Subpart W) (Proposed Rule)**

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	40	4	2	46	\$4,550
2	153	15	8	176	\$17,400
3	335	34	17	385	\$38,100
Total	528	53	26	607	\$60,050
Average	176	18	9	202	\$20,000

**oxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63,**

Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
\$0	\$4,550
\$1,850,000	\$1,867,400
\$3,440,000	\$3,478,100
\$5,290,000	\$5,350,050
\$1,760,000	\$1,780,000

**Table 5: Average Annual EPA Burden and Cost Year 1 – Review of the NESHAP for Epoxy Resin Production (40 CFR Part 63, Subpart W) (Proposed Rule)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (CxD)
Report review					
Notification of construction/reconstruction and startup <sup>c</sup>	2	1	2	0	0
Notification of physical and operational changes <sup>d</sup>	2	1	2	0	0
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0
Notification of actual startup <sup>c</sup>	2	1	2	0	0
Notification of applicability of the standard new sources <sup>c</sup>	2	1	2	0	0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0
Report of initial test <sup>c</sup>	8	1	8	0	0
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0	0
Quality control plan for CMS <sup>c</sup>	4	1	4	0	0
Semiannual SSM reports <sup>e, f</sup>	4	2	8	0	0
CMS summary report for HAP	4	1	4	0	0
Immediate reports of inconsistent procedures	4	1	4	0	0
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	8	4	32	0	0
Report of no excess emission	2	4	8	0	0
Compliance status information report <sup>c</sup>	2	1	2	0	0
Waiver application <sup>h</sup>	8	1	8	0	0
<b>TOTAL (rounded) <sup>i</sup></b>					

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no additional new sources subject to the rule over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory requirements and that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is anticipated that facilities that begin complying in year 2 will have a higher burden than those that begin in year 3.

<sup>b</sup> This ICR uses the following labor rates: \$69.04 for managerial, \$51.23 for technical, and \$27.73 for clerical labor. These rates are based on the 2021 Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to reflect the rates available to government employees.

<sup>c</sup> We have assumed that this is a one-time-only cost.

<sup>d</sup> We have assumed that no facilities will conduct some form of physical or operational change.

<sup>e</sup> We have assumed that there are 5 sources that are subject to this regulation that report semiannually.

<sup>f</sup> We have assumed that it will take four hours to review semiannual reports.

<sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden presented in Table 6.

<sup>h</sup> We have assumed that one facility will request a waiver. Note that this item is not included in the incremental burden presented in Table 6.

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



**Table 6: Average Annual EPA Burden and Cost Year 2 – Review of the NESHAP for Epc Production (40 CFR Part 63, Subpart W) (Proposed Rule)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>
Report review				
Notification of construction/reconstruction and startup <sup>c</sup>	2	1	2	0
Notification of physical and operational changes <sup>d</sup>	2	1	2	0
Notification of anticipated startup <sup>c</sup>	2	1	2	0
Notification of actual startup <sup>c</sup>	2	1	2	0
Notification of applicability of the standard new sources <sup>c</sup>	2	1	2	0
Notification of initial performance test <sup>c</sup>	2	1	2	2
Report of initial test <sup>c</sup>	8	1	8	2
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0
Quality control plan for CMS <sup>c</sup>	4	1	4	0
Semiannual SSM reports <sup>e, f</sup>	4	2	8	0
CMS summary report for HAP	4	1	4	0
Immediate reports of inconsistent procedures	4	1	4	0
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	8	4	32	0
Report of no excess emission	2	4	8	0
Compliance status information report <sup>c</sup>	2	1	2	2
Waiver application <sup>h</sup>	8	1	8	0
<b>TOTAL (rounded) <sup>i</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no new sources to the rule over the three-year period of this ICR. We assume that each respondent will have to familiarize with the rule that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is anticipated that

<sup>b</sup> This ICR uses the following labor rates: \$69.04 for managerial, \$51.23 for technical, and \$27.73 for clerical labor. Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased to be available to government employees.

<sup>c</sup> We have assumed that this is a one-time-only cost.

<sup>d</sup> We have assumed that no facilities will conduct some form of physical or operational change.

<sup>e</sup> We have assumed that there are 5 sources that are subject to this regulation that report semiannually.

<sup>f</sup> We have assumed that it will take four hours to review semiannual reports.

<sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden.

<sup>h</sup> We have assumed that one facility will request a waiver. Note that this item is not included in the incremental burden.

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

**oxy Resin and Non-Nylon Polyamide**

(E) Technical person- hours per year (Cx D)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
4	0.2	0.4	229.82
16	0.8	1.6	919.28
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
4	0.2	0.4	\$229.82
0	0	0	\$0.00
<b>28</b>			<b>\$1,380</b>

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

additional new sources per year that will become subject to the regulatory requirements each year. We have assumed that all affected facilities will read the rule in year 1.

labor. These rates are from the Office of Personnel Management and are reduced by 60 percent to account for the benefit packages.

total burden presented in this ICR.

burden presented in this ICR.

**Table 7: Average Annual EPA Burden and Cost Year 3 – Review of the NESHAP for Epc Production (40 CFR Part 63, Subpart W) (Proposed Rule)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>
Report review				
Notification of construction/reconstruction and startup <sup>c</sup>	2	1	2	0
Notification of physical and operational changes <sup>d</sup>	2	1	2	0
Notification of anticipated startup <sup>c</sup>	2	1	2	0
Notification of actual startup <sup>c</sup>	2	1	2	0
Notification of applicability of the standard new sources <sup>c</sup>	2	1	2	0
Notification of initial performance test <sup>c</sup>	2	1	2	3
Report of initial test <sup>c</sup>	8	1	8	3
Startup, shutdown, malfunction plan <sup>c</sup>	4	1	4	0
Quality control plan for CMS <sup>c</sup>	4	1	4	0
Semiannual SSM reports <sup>e, f</sup>	4	2	8	0
CMS summary report for HAP	4	1	4	0
Immediate reports of inconsistent procedures	4	1	4	0
Report of monitoring exceedances and periods of noncompliance <sup>g</sup>	8	4	32	0
Report of no excess emission	2	4	8	0
Compliance status information report <sup>c</sup>	2	1	2	3
Waiver application <sup>h</sup>	8	1	8	0
<b>TOTAL (rounded) <sup>i</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be five. There will be no new sources added to the rule over the three-year period of this ICR. We assume that each respondent will have to familiarize with the rule that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is anticipated that

<sup>b</sup> This ICR uses the following labor rates: \$69.04 for managerial, \$51.23 for technical, and \$27.73 for clerical labor rates (General Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased to reflect rates available to government employees.

<sup>c</sup> We have assumed that this is a one-time-only cost.

<sup>d</sup> We have assumed that no facilities will conduct some form of physical or operational change.

<sup>e</sup> We have assumed that there are 5 sources that are subject to this regulation that report semiannually.

<sup>f</sup> We have assumed that it will take four hours to review semiannual reports.

<sup>g</sup> We have assumed that one facility will have excess emissions. Note that this item is not included in the incremental burden.

<sup>h</sup> We have assumed that one facility will request a waiver. Note that this item is not included in the incremental burden.

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

**oxy Resin and Non-Nylon Polyamide**

(E) Technical person- hours per year (Cx D)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
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	\$344.73
24	1.2	2.4	\$1,378.92
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	\$344.73
0	0	0	\$0
<b>41</b>			<b>\$2,070</b>

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

Additional new sources per year that will become subject to regulatory requirements each year. We have assumed that affected facilities will read the rule in year 1.

Labor. These rates are from the Office of Personnel Management and are reduced by 60 percent to account for the benefit packages.

Additional burden presented in this ICR.

Additional burden presented in this ICR.



**Table 8: Summary of Average Annual EPA Burden and Cost – Review of the NESHAP for Epoxy  
(40 CFR Part 63, Subpart W) (Proposed Rule)**

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	0	0	0	0	\$0
2	24	2	1	28	\$1,380
3	36	4	2	41	\$2,070
Total	60	6	3	69	\$3,450
Average	20	2	1	23	\$1,150

## xy Resin and Non-Nylon Polyamide Production

Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
\$0	\$0
\$0	\$1,380
\$0	\$2,070
\$0	\$3,450
\$0	\$1,150

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>1</sup>	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	Number of Respondents (E=A+B+C-D)
1	0	5	0	0	5
2	0	5	0	0	5
3	0	5	0	0	5
Average	0	5	0	0	5

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>					
(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
Continuous Monitoring System <sup>a, b</sup>	\$4,544	0	\$0	\$5,453	0
PRD Requirements	\$26,545	5	\$132,724	\$6,762	5
Maintenance Vent Requirements	N/A	N/A	N/A	\$455	5
Control Device and testing to meet D/F Limit	\$560,000	5	\$2,800,000	\$325,000	5

Heat Exchange Systems	\$3,720	5	\$18,600	\$1,102	5
Total <sup>c</sup>			\$2,950,000		

<sup>a</sup> The continuous monitoring system is not included in the incremental burden imposed by the proposed amendments to 4 Subpart W.

<sup>b</sup> Capital/startup costs and O&M costs have been updated from 1998 dollars to 2021 dollars using the CEPCI CE Index.

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

<b>Total Annual Responses</b>		
(A)	(B)	(C)
Information Collection Activity	Number of Respondents <sup>1</sup>	Number of Responses
Notification of physical and operational changes	0	1
Report of monitoring exceedances and periods of noncompliance	0	4
Report of no excess emissions	0	4
Waiver application	0	1
SSM report	0	2
Immediate report of inconsistent procedures	0	1
CMS summary report	0	1
Notification of initial performance test	1.67	1
Report of initial test	1.67	1
Compliance status information report	1.67	1

<sup>1</sup> We have assumed there are five existing respondents that will submit the notification incremental burden of the proposed amendments listed above, or an overall average

(G)
Total O&M, (E x F)
\$0
\$33,809
\$2,277
\$1,625,000

1998 CEPCI CE Index	389.5
2021 CEPCI CE Index	708

\$5,510
\$1,670,000

0 CFR 63,

(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	1.67
0	1.67
0	1.67
Total	5

cations and reports associated with the age of 1.67 respondents per year.