

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

Review of the NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule), EPA ICR Number 1681.11, OMB Control Number 2060-0290.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) were proposed on: May 16, 1994; promulgated on March 8, 1995; and revised on April 20, 2006. The final rule was reviewed under Section 112(d)(6) risk and technology review provisions of the Clean Air Act during 2008; however, the final rule of December 16, 2008 (73 FR 76220) did not result in additional revisions. These regulations apply to either existing facilities and new facilities producing basic liquid epoxy resin (BLR) and epichlorohydrin-modified non-nylon polyamide resins, also known as wet strength resins (WSR). The source subject to this provision emits the hazardous air pollutants (HAPs) epichlorohydrin, and in lesser amounts, hydrochloric acid and methanol. New facilities include those that either commenced construction or reconstruction after the date of proposal. The EPA is proposing amendments to P&R II to add requirements pertaining to: heat exchange systems, PRDs, dioxins and furans emissions from process vents, and maintenance vents. In addition, the EPA is proposing amendments to P&R II that revise provisions pertaining to emissions during periods of SSM, add requirements for electronic reporting of periodic reports and performance test results, and make other minor clarifications and corrections. This information is being collected to assure compliance with 40 CFR Part 63, Subpart W. 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 1681.10.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. 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 are approximately five facilities, which are owned and operated by the epoxy resin and non-nylon polyamide industry. None of the five 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 is 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 five respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

The active (previous) ICR had the following Terms of Clearance (TOC):

“In accordance with 5 CFR 1320, the information collection is approved for three years. As terms of clearance, upon renewal of this collection, EPA is required to include the following in its supporting statement for this and other NESHAP ICRs: (1) a description of the regulatory text applicable to the ICR including submission specifications; (2) a clear description of the data elements being collected under the ICR; (3) screen shots of the electronic portal where the reporting requirements are submitted to EPA (with the control number and burden statement); (4) a detailed discussion of how information is submitted and the extent to which electronic reporting is available; (5) evidence of consultation with respondents (by actively reaching out to stakeholders as permitted by the PRA) to ensure the supporting statement's accuracy on availability of data, frequency of collection, clarity of instructions, accuracy of burden estimate, relevance of data elements, and similar PRA matters; and (6) discussion of how EPA addressed substantive concerns raised by respondents and other stakeholders during consultation and in response to comments received on FR notices. In addition, please convert the supporting statement to the standard 18 question SS-A format upon renewal.”

This ICR addresses the incremental burden associated with the requirements of the proposed rule. The Terms of Clearance apply to the current information collection and will be addressed in the next ICR renewal.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, epichlorohydrin, methanol, and hydrochloric acid emissions from epoxy resin and non-nylon polyamide resin production cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart W.

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 required quarterly and 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 requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b) and notifications of changes in information required in 40 CFR 63.9(j). Additionally, EPA is proposing that owners or operators of affected sources would submit electronic copies of performance test reports and the reports required in 40 CFR 63.528 through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the reports required in 40 CFR 63.528, the EPA would develop a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart W. For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

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 63, Subpart W 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 63, Subpart W.

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 40 CFR Part 63, Subpart W.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 source categories that are the subject of this proposal include the SOCM I source category. The North American Industry Classification System (NAICS) code for SOCM I facilities begins with 325, for P&R I is 325212, and for P&R II is 325211. The list of NAICS codes is not intended to be exhaustive, but rather provides a guide for readers regarding the entities that this proposed action is likely to affect.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction	§63.5(d)
Notification of actual startup	§63.6
Notification of performance test	§63.7(b), §63.9(e)
Notification of compliance status	§63.9(h)
Physical or operational changes	§63.528(a)(3), §63.5(b)(6)
Waiver applications	§63.7(h)
Values of monitored parameters when average values are outside approved ranges	§63.528(a)(1), §63.10(e)
Initial notification and notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Periodic startup, shutdown, malfunction (SSM) reports (Will not apply three years after publication of final rule in the Federal Register)	§63.10(d)(5)(i)

Reports	
Immediate SSM reports where an action taken is not consistent with the procedures specified in the SSM plan (Will not apply three years after publication of final rule in the Federal Register)	§63.10(d)(5)(ii)
Monitoring exceedances and excess emissions (electronic submission)	§63.528(a), §63.10(d), §63.10(e)
No excess emissions (electronic submission)	§63.528, §63.10(e)(3)
Continuous monitoring system (CMS) performance and summary report (electronic submission)	§63.528, §63.10(e)(3), §63.9(g)
Performance test reports (electronic submission)	§63.10(d)(2), §63.528(d)
Duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data	§§63.528(a)(2) and (4), §63.10(e)
Pressure relief device release to atmosphere	§63.528(a)(5)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, and malfunction plan, excursions, and periods where the continuous monitoring system is inoperative. (Startup, shutdown, and malfunction plan will not apply three years after publication of final rule in the Federal Register)	§63.527, §63.528, §63.6, §63.10(b)(2)
Emission tests results, engineering assessments, and other data needed to determine emissions	§63.524, §63.526, §63.527 and §63.10(b)(2)
All reports and notifications	§63.10(b)
Record of applicability	§63.10(b)(3)
Records for sources with continuous monitoring systems	§63.527(b), §63.10(c)
Records are required to be retained for 5 years	§63.10(b)(1)
Records of process changes which change the status of de minimis emission point	§63.527(c), §63.10(e)

Recordkeeping	
Equipment leaks – monitoring, equipment modification and repair records	§63.527(d)
Records for pressure relief devices	§63.527(f)
Records for maintenance vent releases	§63.527(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 has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

As part of the proposed amendments, respondents are 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 and 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 quarterly and 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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for flow rate, temperature, and concentration at the inlet and outlet of the control device.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C or 2D; 3B; 4; 25A or 18 and 25A test 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.

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 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 five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation. 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, respondents will have up to three years to comply with the reporting and recordkeeping requirements associated with these amendments. Most facilities are expected to use the full three years to comply with the general requirements, but it was assumed that one-third of the facilities would begin complying in year 2 and the remaining facilities in year 3. It is anticipated facilities will read the rule in year 1. The specific frequency for each information collection activity within this request is shown Attachment 1 in Tables 1 through 3: Annual Respondent Burden and Cost – Review of the NESHAP for Epoxy Resin and Non-Nylon Polyamide Production (40 CFR Part 63, Subpart W) (Proposed Rule).

6. Estimating the Burden and Cost of the Collection

Tables 1 through 3 document the computation of individual burdens for the

recordkeeping and reporting requirements applicable to the industry for the subpart 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 202 hours (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 NESHAP program, the previously approved ICR, 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous Monitoring System ^{a, b}	\$4,544	0	\$0	\$5,453	0	\$0
PRD Requirements	\$26,545	5	\$132,724	\$6,762	5	\$33,809
Maintenance Vent Requirements	N/A	N/A	N/A	\$455	5	\$2,277
Control Device and testing to meet D/F Limit	\$560,000	5	\$2,800,000	\$325,000	5	\$1,625,000
Heat Exchange Systems	\$3,720	5	\$18,600	\$1,102	5	\$5,510
Total ^c			\$2,950,000			\$1,670,000

^a The continuous monitoring system is not included in the incremental burden imposed by the proposed amendments to 40 CFR 63, Subpart W.

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

^c 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 \$2,950,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,670,000. 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 \$1,760,000 per year. 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 \$1,150 per year.

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, approximately five existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is five per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	5	0	0	5
2	0	5	0	0	5
3	0	5	0	0	5

Number of Respondents					
Average	0	5	0	0	5

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

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 five.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents ¹	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of physical and operational changes	0	1	0	0
Report of monitoring exceedances and periods of noncompliance	0	4	0	0
Report of no excess emissions	0	4	0	0
Waiver application	0	1	0	0
SSM report	0	2	0	0
Immediate report of inconsistent procedures	0	1	0	0
CMS summary report	0	1	0	0
Notification of initial performance test	1.67	1	0	1.67
Report of initial test	1.67	1	0	1.67
Compliance status information report	1.67	1	0	1.67
			Total	5

¹ We have assumed there are five existing respondents that will submit the notifications and reports associated with the incremental burden of the proposed amendments listed above, or an overall average of 1.67 respondents per year.

The number of Total Annual Responses is five.

The average annual labor costs are \$20,000. 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 Tables 1 through 4 and 5 through 8 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The average annual labor hours are 202. 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 40 hours per response.

The average annual capital/startup and O&M costs to the regulated entity are \$1,760,000. 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 23 labor hours at a cost of \$1,150. See Tables 5 through 8 of Attachment 1.

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

There is no change in the labor hours or cost in this ICR as it presents the burden based on the amendments to 40 CFR Part 63, Subpart W and is considered new burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 40 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 2060-0290 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)**