

U.S. Environmental Protection Agency

Information Collection Request

TITLE: National Emission Standards for Hazardous Air Pollutants for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal)

OMB CONTROL NUMBER: 2060-0488

EPA ICR NUMBER: 1974.12

ABSTRACT:

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) were proposed on August 28, 2000; promulgated on June 11, 2002; and most-recently amended on July 2, 2020. These regulations apply to each existing, reconstructed, and new Cellulose Products Manufacturing operation that is a major source of hazardous air pollutant (HAP) emissions or is collocated with other sources that are individually or collectively a major source of HAP emissions. A major source emits, or has the potential to emit, any single HAP at the rate of 10 tons (9.07 megagrams) or more per year, or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart UUUU.

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. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to either the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

All the Cellulose Products Manufacturing facilities in the United States are owned and operated by the Cellulose Products Manufacturing industry (aka: the "Affected Public). The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Cellulose

Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal). The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and refers to Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal). There are approximately eight facilities, which are owned and operated by the Cellulose Products Manufacturing industry. None of the eight facilities in the United States are owned by either state, or local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

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 eight (8) respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate 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, HAP emissions from cellulose products manufacturing facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart UUUU.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in these 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 assure compliance with these same 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 these standards is used to inform either the Agency, or its delegated authority, when a source becomes subject to the requirements of these 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 that these standards are being met. The performance test may also be observed.

The required 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), notifications of changes in provided information required in 40 CFR 63.9(j), performance test reports, performance evaluation reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart UUUU. 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. The EPA is also requiring that 40 CFR Part 63, Subpart UUUU performance test reports be submitted through the EPA's ERT.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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.

The rule was recently amended to include electronic reporting provisions on July 2, 2020. 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 are also 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 semiannual reports are to be created using Form 5900-647, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is 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>.

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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 for state and local agencies that have been delegated authority. If either 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 either the delegated state or local agency. If either 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.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The 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 these regulations. 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.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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 that 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.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

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 these standards. The 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. The 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 either the destruction or nonexistence of essential records.

Otherwise, these reporting or recordkeeping requirements do not include any special circumstances requiring justification under 5 CFR 1320.5.

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the *Federal Register* for this renewal.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately eight (8) respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both Viscofan, USA, Inc. and the Dow Inc. Dow responded indicating they no longer own or operate facilities subject to the Subpart UUUU rule. No comments relating to burden were received from industry trade associations or other interested parties.

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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 (CBI) (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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are cellulose products manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 63, Subpart UUUU)	SIC Codes	NAICS Codes
All Other Plastics Product Manufacturing	3089	326199
Unlaminated Plastics Profile Shape Manufacturing	3082, 3089	326121
Plastics Material and Resin Manufacturing	2821	325211
Artificial and Synthetic Fibers and Filaments Manufacturing	2823	325220
All Other Basic Organic Chemical Manufacturing	2869	325199

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU).

A source must make the following reports:

Notifications	
Initial notifications	§63.5575, §§63.9(b)(1-5)

Notifications	
Notification of performance test	§63.5575, §63.7(b), §63.9(e)
Notification of CMS performance evaluation	§63.5575, §63.8(e), §63.9(g)(1)
Notification of compliance status (including electronic submittal of results of performance test, CMS performance evaluation, or other initial compliance demonstration)	§63.5575, §§63.9(h)(1-6), §63.10(d)(2), §63.10(e)(2)
Notifications for equipment leaks	§63.5575, §§63.182(a)(1-2), §63.182(b), §§63.182(c)(1-3), §63.1039(a)
Notifications for wastewater	§63.5575, §63.146(a), §63.146(b), §63.151, §§63.152(a)(1-3), §§63.152(b)(1-5),
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	
Electronic submittal of semiannual reports	§63.5580
Semiannual report - deviations/out-of-control operation	§63.5580
Semiannual report - equipment leaks	§63.5580, §63.182(a)(3), §63.182(a)(6), §§63.182(d)(2-4), §63.1039(b)
Semiannual report - wastewater	§63.5580, §§63.146(c-e), §§63.152(a)(4-5), §§63.152(c-e)
Semiannual report - changes in information	§63.5580, 63.9(j)
Semiannual report - closed-vent system	§63.5580, §63.148(i)(4), §63.148(j)(1)
Semiannual report - bypass lines	§63.5580, §63.148(i)(3) §§63.148(j)(2-3)
Semiannual report - heat exchanger systems	§63.5580, §§63.104(f)(2)(i-iv)

Reports	
Semiannual report - storage vessel control device maintenance	§66.5580

A source must keep the following records:

Recordkeeping	
Record retention	§63.5590, §63.10(b)(1)
Records of documentation supporting initial notification and notification of compliance status	§63.5585, §63.10(b)(2)(xiv)
Records of performance tests, CMS performance evaluations, and other initial compliance demonstrations	§63.5585, §63.10(b)(2)(viii)
Records of site-specific monitoring plan	§63.5515(b), §63.5545, §63.5580(c)(6), §63.5585, §63.8(c)(3), §63.8(c)(4)(ii), §63.8(d)(2), §63.10(c), §63.10(e)(1), §63.10(e)(2)(i)
Records of each CMS	§63.5585, §63.8(f)(6)(i), §63.10(b)(2)(vi-xi), §63.10(c)
Records of closed-loop systems	§63.5585
Records of nitrogen systems	§63.5585
Records of material balances	§63.5585
Records of calculations	§63.5585
Records for extended cookout	§63.5585
Records for equipment leaks	§63.5585, §63.181, §63.1038
Records for wastewater	§63.5585, §63.105, §63.147, §63.152(f-g)
Records for closed-vent systems	§63.5585, §63.148(i)
Records for bypass lines	§63.5585
Records for heat exchanger systems	§63.5585, §63.104(f)(1)
Records for storage vessel control device maintenance	§63.5585
Records for safety devices	§63.5585

12c. RESPONDENT ACTIVITIES

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS.
Perform performance test, using Reference Method 1 or 1A; 2, 2A, 2C, 2D, 2F, or 2G; 3, 3A, or 3B; 4; 15 (total sulfide); 18, 320, 25, or 25A (total organic HAP); 22 (visible emissions); and 624 (wastewater HAP), 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.

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

Table 1 below documents 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.

This ICR uses the following labor rates:

- Managerial \$163.17 (\$77.70 + 110%)
- Technical \$130.28 (\$62.04 + 110%)
- Clerical \$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1,

“Total compensation.” These rates have been increased by 110 percent 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.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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 these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and such other costs as photocopying and postage.

Capital/Startup vs. O&M Costs						
(A) Cost Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of 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) Number of Respondents with O&M
Continuous	N/A	N/A	N/A	\$78	8	\$624

Capital/Startup vs. O&M Costs						
(A) Cost Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of Responde nts	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Responde nt	(F) Number of Responde nts with O&M	(G) Number of Responde nts with O&M
Parameter Monitoring System						
Performance tests:						
Method 15 for total sulfide	\$14,000	13	\$182,000	N/A	N/A	N/A
Method 18 for organic HAP	\$14,000	19	\$266,000	N/A	N/A	N/A
Method 25D for wastewater organic HAP	\$14,000	3	\$42,000	N/A	N/A	N/A
Totals			\$490,000			\$600
Average annualized cost			\$163,333^b			\$200

^b Annualized capital costs were estimated assuming a 5-year payment period at 7% interest for periodic performance tests (with capital recovery factor of 0.2439).

The total annualized capital/startup costs for this ICR are \$163,333. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$200. 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 \$163,533. These are the recordkeeping costs.

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

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

Agency Activities
Observe performance tests and repeat performance tests if necessary.
Conduct excess emissions enforcement activities.
Review notifications, including notifications of construction/reconstruction, actual startup, applicability of standard, performance test, CMS performance evaluation, and compliance status.
Review reports, including performance test reports, CMS performance evaluation reports, and semiannual compliance 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.

14b. Agency Burden and Labor Cost

Table 2 below documents the computation of burden and costs for the Agency. The only costs are those associated with the analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities 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 \$14,786.

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

- Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%)
- Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%)
- Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal).

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

There are no significant changes in burden from the most recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup and/or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2022) to calculate respondent burden costs.

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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 standards and to 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 both state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions

BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 143 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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.

ATTACHMENTS

- EPA Form 5900-647, §63.5580 Semiannual Compliance Report Spreadsheet Template
- CEDRI & ERT System Screenshots

ADDITIONAL TABLES AND APPENDICES

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	8	1	8	2.7	21	1.1	2.1	\$3,094
B. Required activities ^d								
Prepare for periodic performance test	24	1	24	2	48	2.4	4.8	\$6,960
Attend periodic performance test	24	2	48	2	96	4.8	9.6	\$13,921
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/reconstruction ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of actual startup ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of applicability ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of performance test ^{f,g}	2	1	2	2	4	0.2	0.4	\$580
Notification of CMS performance evaluation ^{f,g}	2	1	2	2	4	0.2	0.4	\$580
Notifications for equipment leaks ^{e,f}	2	1	2	0	0	0	0	\$0
Notifications for wastewater ^{e,f}	2	1	2	0	0	0	0	\$0

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
Notification of compliance status ^{g,h}	40	1	40	2.7	107	5.3	11	\$15,468
Semiannual report - no deviations ⁱ	8	2	16	6.4	102	5.1	10	\$14,849
Semiannual report - deviations ^j	16	2	32	1.6	51	2.6	5.1	\$7,424
Semiannual report - equipment leaks ^k	303	2	606	3	1,818	91	182	\$263,627
Semiannual report – wastewater	See 4E							
Semiannual report - other ^l	8	2	16	8	128	6.4	13	\$18,561
Subtotal for Reporting Requirements					2,737			\$345,065
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Records of failures to meet standards/actions taken to minimize emissions ^m	2	12	24	0.4	10	0.5	1.0	\$1,392
Records of continuous parameters monitoring system (CPMS) data ⁿ	1	365	365	8	2,920	146	292	\$423,428
Records of closed-loop systems ^o	2	2	4	1	4	0.2	0.4	\$580
Records of nitrogen systems ^p	2	2	4	5	20	1	2	\$2,900
Records of material balances ^q	8	2	16	5	80	4	8	\$11,601
Records of supporting calculations ^r	8	2	16	8	128	6.4	13	\$18,561
Records for equipment leaks	See 3E							
All other records	See 3E							
F. Time to train personnel								
Initial training ^{es}	40	1	40	0	0	0	0	\$0

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
Refresher training ⁱ	16	1	16	8	128	6.4	13	\$18,561
G. Time to transmit or disclose information ^u								
Compile data	24	2	48	8	384	19	38	\$55,684
Enter and verify information for semiannual report	16	2	32	8	256	13	26	\$37,122
H. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						4,519		\$569,829
TOTAL LABOR BURDEN AND COST						7,256		\$914,894
TOTAL CAPITAL AND O&M COST								\$163,533
GRAND TOTAL								\$1,078,427

Assumptions:

^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellulose ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no new sources will become subject to the rule each year over the 3-year period of this ICR.

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent 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.

^c We have assumed that it will take the respondents 8 hours to familiarize themselves with the regulatory requirements during the three-year period covered by this ICR renewal (8 respondents/3 years = 2.7).

^d We estimate that it will take the respondent 24 hours to prepare for periodic performance test (e.g., prepare test plan) and 24 hours to attend the test. We also estimate 2 plant personnel will attend the test.

^e These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

^f We estimate that it will take the respondent 2 hours to complete the notification.

^g We estimate that 6 facilities will need to submit notification of performance test, conduct the test, and report the results through CEDRI. No performance test required for the 2 cellulosic sponge and cellophane facilities because these facilities use recovery devices to meet the emission limit. These facilities are required to conduct a compliance demonstration based on the material balance for their process. The periodic testing will occur once during the 3-year ICR period (6

respondents/3 years = 2). All 8 facilities must submit a notification of compliance status with results of the performance test (8 respondents/3 years = 2.7).

^h We estimate that it will take each respondent 40 hours to prepare the notification of compliance status.

ⁱ We have assumed that 80% of all respondents will report no deviation (0.8 x 8 respondents = 6.4).

^j We have assumed that 20% of all respondents will report a deviation (0.2 x 8 respondents = 1.6).

^k We estimate that it will take each respondent 303 hours on a semiannual basis to write reports for 3 cellulose ether facilities subject to leak detection and repair (LDAR) requirements.

^l All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, will be reported twice per year for all 8 facilities.

^m We have assumed that 5% of respondents will fail to meet standards each year (0.05 x 8 = 0.4). We estimate that each respondent will take 2 hours 12 times per year to keep records of failures to meet the standards and the actions taken to minimize emissions.

ⁿ We estimate that it will take each respondent 1 hour to record information on a daily basis on process vent, storage tank and wastewater monitoring and inspections.

^o We estimate that it will take each respondent 2 hours to enter information on 1 cellulose ether facility with a closed-loop system.

^p We estimate that it will take each respondent 2 hours to enter information on 5 viscose process facilities with CS2, unloading and storage operations.

^q We estimate that it will take each respondent 8 hours to enter information on 5 viscose process facilities using material balances.

^r We estimate that it will take each respondent 8 hours to enter information on supporting calculations twice per year.

^s We estimate that it will take each respondent 1 week (40 hours) to provide initial training to personnel with new sources.

^t We estimate that it will take each respondent 2 days (16 hours) to provide refresher training to personnel.

^u We have assumed that each respondent will enter and verify information for the semiannual report twice per year.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person hours per plant per year (C=AxB)	Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
Activity								
Attend performance test ^c	24	1	24	0.2	4.8	0.2	0.5	\$293
Excess emissions enforcement activities ^d	120	1	120	0.06	7.2	0.4	0.7	\$440
Review reports								
Notification of construction/reconstruction ^e	2	1	2	0	0	0	0	\$0
Notification of actual startup ^e	2	1	2	0	0	0	0	\$0

Notification of applicability ^e	2	1	2	0	0	0	0	\$0
Notification of performance test ^f	2	1	2	2	4	0.2	0.4	\$245
Notification of CMS performance evaluation ^f	2	1	2	2	4	0.2	0.4	\$245
Notification of compliance status ^g	4	1	4	2.7	11	0.5	1.1	\$652
Report of performance test ^h	8	1	8	2	16	0.8	1.6	\$978
Report of CMS performance evaluation ^h	8	1	8	2	16	0.8	1.6	\$978
Semiannual report - no deviations ⁱ	2	2	4	6.4	26	1.3	2.6	\$1,565
Semiannual report - deviations ^j	8	2	16	1.6	26	1.3	2.6	\$1,565
Semiannual report - equipment leaks ^k	8	2	16	3	48	2.4	4.8	\$2,934
Semiannual report - wastewater ^k	8	2	16	3	48	2.4	4.8	\$2,934
Semiannual report - other ^l	2	2	4	8	32	1.6	3.2	\$1,956
TOTAL ANNUAL BURDEN AND COST						278		\$14,786

Assumptions:

^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellulose ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a total of 8 respondents). We estimate no new sources will become subject to the rule each year over the 3-year period of this ICR.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$73.456 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.512 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.504 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

^c We estimate that it will take EPA personnel 24 hours to attend performance tests at 10% of facilities required to test (0.1 x 6 respondents/3 years = 0.2).

^d We estimate that 10% of the affected facilities will be required to retest as a result of deviations, and EPA personnel will attend 10% of these tests (0.1 x 0.1 x 6 respondents = 0.06).

^e We estimate that it will take EPA personnel 2 hours to complete review of the initial notifications (construction/reconstruction, actual startup, applicability of standard).

^f We estimate that it will take EPA personnel 2 hours to complete review of the notifications of performance test and CMS performance evaluation for facilities required to test (6 respondents/3 years = 2).

^g We estimate that it will take EPA personnel 4 hours to complete review of the notification of compliance status for all 8 facilities (8 respondents/3 years = 2.7).

^h We estimate that it will take EPA personnel 8 hours to complete review of the performance test and CMS performance evaluation data for facilities required to test (6 respondents/3 years = 2).

ⁱ We have assumed that 80% of respondents will report no deviations (0.8 x 8 respondents = 6.4) and that it will take EPA personnel 2 hours two times per year to review those reports.

^j We have assumed that 20% of respondents will report deviations (0.2 x 8 respondents = 1.6) and that it will take EPA personnel 8 hours two times per year to review those reports.

^k We estimate that it will take EPA personnel 8 hours two times per year to review the reports of 3 cellulose ether facilities subject to LDAR and wastewater requirements.

^l We estimate that it will take EPA personnel 2 hours two times per year to review all other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance, for all 8 facilities.