

ICR Summary Information

Hours per Response	143
Number of Respondents	8
Total Estimated Burden Hours	7,256
Total Estimated Costs	\$1,078,427
Annualized Capital O&M	\$163,533
Total Annual Responses	51
Form Number	5900-647

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Cellulose Products

Burden item	(A)	(B)
	Person hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Reporting Requirements		
A. Familiarize with regulatory requirements ^c	8	1
B. Required activities ^d		
Prepare for periodic performance test	24	1
Attend periodic performance test	24	2
C. Create information	See 3B	
D. Gather existing information	See 3B	
E. Write report		
Notification of construction/reconstruction ^{e,f}	2	1
Notification of actual startup ^{e,f}	2	1
Notification of applicability ^{e,f}	2	1
Notification of performance test ^{f,g}	2	1
Notification of CMS performance evaluation ^{f,g}	2	1
Notifications for equipment leaks ^{e,f}	2	1
Notifications for wastewater ^{e,f}	2	1
Notification of compliance status ^{g,h}	40	1
Semiannual report - no deviations ⁱ	8	2
Semiannual report - deviations ^j	16	2
Semiannual report - equipment leaks ^k	303	2
Semiannual report - wastewater	See 4E	
Semiannual report - other ^l	8	2
Subtotal for Reporting Requirements		
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
Records of continuous parameters monitoring system (CPMS) data ⁿ	1	365
Records of closed-loop systems ^o	2	2
Records of nitrogen systems ^p	2	2
Records of material balances ^q	8	2
Records of supporting calculations ^r	8	2

Records for equipment leaks	See 3E	
All other records	See 3E	
F. Time to train personnel		
Initial training ^{e,s}	40	1
Refresher training ^t	16	1
G. Time to transmit or disclose information ^u		
Compile data	24	2
Enter and verify information for semiannual report	16	2
H. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
TOTAL ANNUALIZED CAPITAL AND O&M COST		
GRAND TOTAL		

Assumptions:

^a We estimate that there are 8 sources that are subject to the standard which includes the following facilities: 3 cellu total of 8 respondents). We estimate no new sources will become subject to the rule each year over the 3-year perio

^b This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and M \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, I occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increas overhead business costs of employing workers beyond their wages and benefits, including business expenses assoc

^c We have assumed that it will take the respondents 8 hours to familiarize themselves with the regulatory requireme years = 2.7).

^d We estimate that it will take the respondent 24 hours to prepare for periodic performance test (e.g., prepare test pl the test.

^e These requirements are one-time requirements that apply to new respondents. There are no new respondents estim

^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 r and cellophane facilities because these facilities use recovery devices to meet the emission limit. These facilities an for their process. The periodic testing will occur once during the 3-year ICR period (6 respondents/3 years = 2). All 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 ethe

^l All other reports, including changes of information, closed-vent systems, bypass lines, heat exchanger systems, an 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 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, storag

^o We estimate that it will take each respondent 2 hours to enter information on 1 cellulose ether facility with a close

^p We estimate that it will take each respondent 2 hours to enter information on 5 viscose process facilities with CS₂

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

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

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

^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.

Manufacturing (40 CFR Part 63, Subpart UUUU) (Renewal)

(C)	(D)	(E)	(F)	(G)	(H)
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
8	2.7	21	1.1	2.1	\$3,094
24	2	48	2.4	4.8	\$6,960
48	2	96	4.8	9.6	\$13,921
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	\$580
2	2	4	0.2	0.4	\$580
2	0	0	0	0	\$0
2	0	0	0	0	\$0
40	2.7	107	5.3	11	\$15,468
16	6.4	102	5.1	10	\$14,849
32	1.6	51	2.6	5.1	\$7,424
606	3	1,818	91	182	\$263,627
16	8	128	6.4	13	\$18,561
		2,737			\$345,065
24	0.4	10	0.5	1.0	\$1,392
365	8	2,920	146	292	\$423,428
4	1	4	0.2	0.4	\$580
4	5	20	1	2	\$2,900
16	5	80	4	8	\$11,601
16	8	128	6.4	13	\$18,561

Labor
Management
Technical
Clerical

40	0	0	0	0	\$0
16	8	128	6.4	13	\$18,561
48	8	384	19	38	\$55,684
32	8	256	13	26	\$37,122
		4,519			\$569,829
		7,256			\$914,894
					\$163,533
					\$1,078,427

lose ether; 1 cellulosic sponge; 3 cellulose food casing; and 1 cellophane (for a d of this ICR.

anagerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and Bureau of Labor Statistics, September 2022, “Table 2. Civilian workers by ed by 110 percent to account for varying industry wage rates and the additional iated with hiring, training, and equipping their employees.

ents during the three-year period covered by this ICR renewal (8 respondents/3

an) and 24 hours to attend the test. We also estimate 2 plant personnel will attend

ated over the 3-year period of this ICR.

esults through CEDRI. No performance test required for the 2 cellulosic sponge e required to conduct a compliance demonstration based on the material balance l 8 facilities must submit a notification of compliance status with results of the

r facilities subject to leak detection and repair (LDAR) requirements.

id storage vessel control device maintenance, will be reported twice per year for all

each respondent will take 2 hours 12 times per year to keep records of failures to

e tank and wastewater monitoring and inspections.

ed-loop system.

, unloading and storage operations.

terial balances.

ar.

ources.

Rates
\$163.17
\$130.28
\$65.71

hrs/respon 143

Table 2: Average Annual EPA Burden and Cost – NESHAP for Cellulose Products Manufacturing

Activity	(A)	(B)	(C)	(D)	(E)
	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)
Activity					
Attend performance test ^c	24	1	24	0.2	4.8
Excess emissions enforcement activities ^d	120	1	120	0.06	7.2
Review reports					
Notification of construction/reconstruction ^e	2	1	2	0	0
Notification of actual startup ^e	2	1	2	0	0
Notification of applicability ^e	2	1	2	0	0
Notification of performance test ^f	2	1	2	2	4
Notification of CMS performance evaluation ^f	2	1	2	2	4
Notification of compliance status ^g	4	1	4	2.7	11
Report of performance test ^h	8	1	8	2	16
Report of CMS performance evaluation ^h	8	1	8	2	16
Semiannual report - no deviations ⁱ	2	2	4	6.4	26
Semiannual report - deviations ^j	8	2	16	1.6	26
Semiannual report - equipment leaks ^k	8	2	16	3	48
Semiannual report - wastewater ^k	8	2	16	3	48
Semiannual report - other ^l	2	2	4	8	32
TOTAL ANNUAL BURDEN AND COST					

Assumptions:

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

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for governn 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 \$34.07. These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of 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

^d We estimate that 10% of the affected facilities will be required to retest as a result of deviations, and EPA personnel will at respondents = 0.06).

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

^f We estimate that it will take EPA personnel 2 hours to complete review of the notifications of performance test and CMS p 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 fa

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

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

^j We have assumed that 20% of respondents will report deviations (0.2×8 respondents = 1.6) and that it will take EPA personnel 8 hours 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 the new 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, lines, heat exchanger systems, and storage vessel control device maintenance, for all 8 facilities.

ig (40 CFR Part 63, Subpart UUUU) (Renewal)

(F)	(G)	(H)
Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$^b
0.2	0.5	\$293
0.4	0.7	\$440
0	0	\$0
0	0	\$0
0	0	\$0
0.2	0.4	\$245
0.2	0.4	\$245
0.5	1.1	\$652
0.8	1.6	\$978
0.8	1.6	\$978
1.3	2.6	\$1,565
1.3	2.6	\$1,565
2.4	4.8	\$2,934
2.4	4.8	\$2,934
1.6	3.2	\$1,956
278		\$14,786

Labor Rates	
Management	\$73.46
Technical	\$54.51
Clerical	\$29.50

r; 1 cellulosic sponge; 3 cellulose food
r over the 3-year period of this ICR.

ment overhead expenses. Managerial rates
29.504 (GS-6, Step 3, \$18.44 + 60%).
pay. The rates have been increased by 60

6 respondents/3 years = 0.2).

tend 10% of these tests (0.1 x 0.1 x 6

tion, actual startup, applicability of

erformance evaluation for facilities

ilities (8 respondents/3 years = 2.7).

uation data for facilities required to test

ersonnel 2 hours two times per year to

nnel 8 hours two times per year to review

ubject to LDAR and wastewater

ormation, closed-vent systems, bypass

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
Continuous Parameter Monitoring System	N/A	N/A	N/A
Performance Tests:			
Method 15 for total sulfide	\$14,000	13	\$182,000
Method 18 for organic HAP	\$14,000	19	\$266,000
Method 25D for wastewater organic HAP	\$14,000	3	\$42,000
Totals (rounded)			\$490,000
Total annualized capital cost^b			\$163,333

^b Annualized capital costs were estimated assuming a 5-year payment period at 7% interest for periodic perform

O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
\$78	8	\$624
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A
		\$600
		\$200

\$163,533

ance tests (with capital recovery factor of 0.2439).

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of performance test	2	1	0	2
Notification of CMS performance evaluation	2	1	0	2
Notification of compliance status	2.7	1	0	2.7
Semiannual report - no deviations	6.4	2	0	12.8
Semiannual report – deviations	1.6	2	0	3.2
Semiannual report - equipment leaks	3	2	0	6
Semiannual report – wastewater	3	2	0	6
Semiannual report - all others	8	2	0	16
			Total	51

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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
1	0	8	0	0
2	0	8	0	0
3	0	8	0	0
Average	0	8	0	0

^a New respondents include sources with constructed and reconstructed affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
8
8
8
8