

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**Risk and Technology Review of the National Emission Standards for Hazardous Air
Pollutants for Group I Polymers and Resins (Proposed Rule)**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Risk and Technology Review of the National Emission Standards for Hazardous Air Pollutants for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (Proposed Rule), EPA ICR Number 2410.06, OMB Control Number 2060-0665.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart U were proposed on June 12, 1995, promulgated on September 5, 1996, and amended on June 19, 2000, July 16, 2001, December 16, 2008, and April 21, 2011. These regulations apply to existing and new elastomer product process units (EPPU) and associated equipment including waste management units, maintenance wastewater, heat exchange systems, and equipment required by or utilized to comply with this Subpart located at facilities that are major sources of hazardous air pollutants (HAPs) and are classified in the Group I Polymers and Resins source category. The Group I Polymers and Resins source category includes the following categories: Butyl Rubber Production, Epichlorohydrin Elastomers Production, Ethylene Propylene Rubber Production, Hypalon Production, Neoprene Production, Nitrile Butadiene Rubber (NBR) Production, Polybutadiene Rubber Production, Polysulfide Rubber Production, and Styrene Butadiene Rubber and Latex Production. New facilities include those that commenced construction, or reconstruction after the date of proposal.

As part of a residual risk and technology review for the NESHAP, the Environmental Protection Agency (EPA) is proposing amendments to the NESHAP for Group 1 Polymers and Resins that revise provisions pertaining to emissions from flares, PRDs, continuous process vents, batch process vents, storage vessels, pressure vessels, storage vessel degassing, heat exchange systems, maintenance vents, wastewater, and equipment leaks. The EPA is also proposing to add requirements pertaining to: CP emissions from, process vents, storage vessels, and wastewater; and dioxins and furans emissions from continuous process vents and batch process vents. In addition, the EPA is proposing amendments to the P&R I NESHAP that revise provisions pertaining to emissions during periods of SSM, add requirements for electronic reporting of periodic reports and performance test results, fence line monitoring, carbon adsorbers, and bypass monitoring, and make other minor clarifications and corrections. This information will be collected to assure compliance with the P&R I NESHAP. 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 2410.05.

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

Any owner/operator subject to the provisions of this part shall maintain a file of these notifications, reports, and records, and retain the file for at least five years. All reports are sent to the delegated state or local authority. In the event there is no such delegated authority, the reports are sent directly to the EPA regional office. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

Over the next three years, 19 P&R I facilities will be subject to this standard, and the total labor, capital, and operations and maintenance costs imposed by the amendments will be approximately \$3.48 million per year for the first 3 years after the proposed amendments are finalized. The burden to the respondents from each facility is shown in Tables 1 through 4 in Attachment 1.

The total average annual cost to the Designated Administrator during the 3 years of the ICR is estimated to be \$48,600 per year. This burden includes labor costs for the Federal EPA and state and local authorities to implement the requirements in the NESHAP after the proposed amendments are finalized. This burden is shown in Tables 5 through 8 of Attachment 1.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under CAA Section 112, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and require the maximum degree of emission reduction. In addition, CAA section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with Section 114(a)(3);
- and (G) provide such other information as the Administrator may

reasonably require.

In the Administrator's judgment, HAP emissions from EPPU and associated equipment located at Group I Polymers and Resins facilities 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 U.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting information will be used by Designated Administrators to ensure compliance with the applicable regulations, which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors, along with the other required monitors, are used to ensure compliance with the standards at all times.

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

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting will be required under 40 CFR Part 63, Subpart U.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public notice prior to ICR submission to OMB

A public notice and solicitation of public comment on this collection is provided in the Federal Register notice of the proposed rulemaking published for the P&R I NESHAP.

3(c) Consultations

The public will be provided the opportunity to review and comment on the burden estimated in this Information Collection Request during the comment period for the proposed rulemaking.

3(d) Effects of Less Frequent Data Collection

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

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

3(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in 40 CFR 2, subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of EPPU and associated equipment at Group I Polymers and Resins manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2822 which corresponds to the North American Industry Classification System (NAICS) 325212 for Synthetic Rubber Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all data that are recorded or reported is required by the P&R I NESHAP (40 CFR, Part 63, Subpart U). The tables below reflect the proposed amendments.

A source must make the following reports:

Notifications	
Application of construction or reconstruction.	§63.506(b)(2)
Request for extension of compliance.	§63.9(c), §63.506(b)
Notification that source is subject to special compliance requirements.	§63.9(d), §63.506(b)
Notification of Compliance Status.	§63.506(e)(5)
Notification of storage vessel inspection.	§63.506(e)(7)(i)
Notification of front-end process vents limit	§63.485(q)
Notification of back-end process vents limit	§63.499(f)(1)

Reports	
Progress reports for sources receiving an extension of compliance.	§63.10(d)(4), §63.506(b)
Waiver of recordkeeping or reporting requirements.	§63.10(f), §63.506(b)
Supplemental reports for circumstances when the owner or operator of a source meets the requirements for failing to submit information required to be included in a specified report.	§63.506(e)(1)
Pre-compliance report.	§63.506(e)(3)
Emissions Averaging Plan.	§63.506(e)(4)
Updates to Emissions Averaging Plan.	§63.506(e)(4)(iv)

Reports	
Semiannual or quarterly periodic reports.	§63.506(e)(6)
Request of approval for a nominal control efficiency for use in calculating credits for an emissions average.	§63.506(7)(ii)
Compliance redetermination report for back-end process operations using a control or recovery device.	§63.506(e)(7)(iii)
Reports of changes to the primary product for an EPPU or process unit as required by §§63.480(f)(3)(iii), 63.480(f)(9), or 63.480(f)(10)(iii)(C).	§63.506(e)(7)(iv)
Reports of changes or additions to plant sites.	§63.506(e)(7)(v)
Operating permit application.	§63.506(e)(8)
Back-end process vents records in periodic reports	§63.499(f), §63.506(e)(6)
Front-end process vents records in periodic reports	§63.506(d), §63.506(e)(6)
Continuous front-end process vent in chloroprene service records in periodic reports	§63.485(y)
Batch front-end process vent in chloroprene service records in periodic reports	§63.487(j)
Maintenance vent exceedance periodic reports	§63.492(g)
Emission limit excursions	§63.506(e)(6)(iii)(C)
Performance test reports (electronic submission)	§63.506(i)(1)

A source must keep the following records:

Recordkeeping	
Retain data for 5 years.	§63.506(a)
Malfunction records.	§63.506(b)(1)
Records of start-up, shutdown, and malfunction.	§63.506(b)(1)(i)

Recordkeeping	
Storage vessel records.	§63.506(d)
Storage vessel chloroprene concentration and operating values	§63.484(u)(3)
Records of each measured data value or block average for 1 hour or shorter periods calculated from all measured data values during each period.	§§63.506(d)(1-2)
Records of daily average (or batch cycle daily average) values of each continuously monitored parameter calculated for each operating day.	§63.506(d)(3)
Records required when all recorded values are within the established limits.	§63.506(d)(6)
Records of the times and durations of all periods of: monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments; non-operation of the affected source (or portion thereof), resulting in cessation of the emission to which the monitoring applies; or any other periods during process or control device or recovery device operation when monitors are not operating.	§63.506(d)(7)
Records of calibration checks and documenting maintenance for CMS used to comply with this subpart.	§63.506(d)(8)
Records of information, if any, required as a condition of a waiver of recordkeeping or reporting requirements.	§63.509(d)(9)
Front-end process vent records.	§63.491
Back-end process vent records.	§63.498
Continuous front-end process vents in chloroprene service records	§63.485(y)
Batch front-end process vent in chloroprene service records	§63.487(j)
Flare records	§§63.491(b)(3)(iv), 63.498(d)(5)(ii)(F)
Dioxin/Furan concentration	§63.491(b)(6)
Bypass records	§§63.491(e)(6), 63.498(d)(5)(v)
Maintenance vent records	§63.491(h)

Recordkeeping	
Process information records during performance tests	§63.504(a)(1)(iii)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

As part of the proposed amendment, respondents would be required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents would be required to submit electronic copies of notifications and certain reports through EPA’s CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The quarterly, semiannual, and annual reports are to be created using Form [XXXX-XXX], the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent quarterly, semiannual, and annual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there will be no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

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

Respondent Activities
Adjust the existing ways to comply with any previously applicable instruction and requirements.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION, METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in Enforcement and Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS).

5(b) Collection Methodology and Management

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and

enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

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

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

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

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 8,130 hours. The average annual recordkeeping hours are 6,760 and the reporting requirement hours are 1,370, both of which are shown in Table 4 of Attachment 1. These hours are based on review of background documents in development of the amendments to this NESHAP, Agency knowledge and experience with the NESHAP program, and related ICRs.

6(b) Estimating Respondent Costs

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

(i) Estimating Labor Costs

This ICR uses the following labor rates:

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

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2021, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 - Chemical Manufacturing. These rates have been adjusted using a Fringe Benefit Loading Rate of 1.5 and an Overhead and Profit Rate of 1.4 (Mean Hourly Rate * Fringe Benefit Loading Rate * Overhead and Profit Rate = Loaded Rate) to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(ii) Estimating Capital/Start-up and Operation and Maintenance Costs

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

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

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

Capital/Startup and O&M Costs (2021\$)						
(A) Unit Type	(B) Capital/Startup Costs for One Respondent	(C) Number of Respondents with Capital/Startup Costs	(D) Total Capital/ Startup Cost (B X C)	(E) Annual Cost (O&M and Capital) for One Respondent	(F) Number of Respondents ^a	(G) Total Annual Cost (Over 3- Yr Period) (E X F)
Flare Monitors	\$364,905	19	\$6,933,195	\$69,400	19	\$1,318,600
PRD Work Practice & Monitors	\$26,526	19	\$503,994	\$6,784	19	\$128,896
Heat Exchangers - El Paso Method Monitors and Repair	\$2,543	19	\$48,317	\$523	19	\$9,937
Carbon Adsorber Monitors & Performance Test ^b	\$16,500	1	\$16,500	\$1,400	1	\$1,400
Pressure Vessel Monitors	\$116	19	\$2,204	\$109	19	\$2,071
Storage Vessel Planned Routine Maintenance	\$2,080	19	\$39,520	\$360	19	\$6,840
Dioxin/Furan Monitors & Performance Test ^c	\$560,000	1	\$560,000	\$325,000	1	\$325,000
Fenceline Monitoring ^d	\$10,625	12	\$127,500	\$104,583	12	\$1,254,996
Process Vent TRE and Maintenance Vent Requirements	\$39,277	19	\$746,263	\$98,884	19	\$1,878,796
Chloroprene Process Vents & Storage Tanks - Control Device ^e	\$1,457,857	1	\$1,457,857	\$753,714	1	\$753,714
Chloroprene Process Vents & Storage Tanks - Control Device Monitor ^e	\$23,200	1	\$23,200	\$4,900	1	\$4,900
Chloroprene Process Vents & Storage Tanks - Control Device Testing ^e	\$38,302	1	\$38,302	\$0	1	NA
TOTAL			\$10,496,852			\$5,685,150

a. Within a given year, there are a maximum of 19 respondents per information collection activity.

b. We estimate 1 respondents operate carbon adsorbers.

c. We estimate 1 respondents operate facilities that produce chlorinated compounds.

d. We estimate 12 respondents will be required to conduct fenceline monitoring.

e. We estimate there are a maximum of 1 respondents that operate equipment in chloroprene service.

The total capital/startup costs for this ICR are \$10.5 million; this is the total of column D.

The total annual costs for this ICR are \$5.69 million; this is the total of column G. This includes O&M and annualized capital costs.

6(c) Estimating Agency Burden and Cost

The costs to the Agency are those costs associated with analysis of the reported information. The Agency’s overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$48,600.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15+ 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02+ 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details on the line item estimates used to calculate these burdens are presented in Tables 5 through 8 of Attachment 1.

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

The total number of respondents is also referred to as the respondent universe. Based on research conducted for the residual risk and technology reviews of the P&R I NESHAP, 19 facilities (of which, 1 facility has chloroprene emission sources) are currently operating and subject to the standards. It was assumed that one-third of the facilities would begin complying with the amendments for heat exchange systems, flares, PRDs, process vents, storage vessels, carbon adsorbers, bypass lines, maintenance vents, equipment leaks, and wastewater in year 2 and the remaining two-thirds of the facilities would begin complying in year 3. The 1 facility with chloroprene emission sources would begin complying with the amendments for storage tanks, process vents, and wastewater in year 2. All 12 facilities required to conduct fence line monitoring would begin complying with requirements in year 2 and submit corrective action plans in year 3.

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

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses (Over 3-Yr Period) E=(BxC)+D
Notification of Compliance Status				
Flares	19	1	0	19

PRDs	19	1	0	19
Continuous Process Vents	19	1	0	19
Batch Process Vents	19	1	0	19
Storage Vessels	19	1	0	19
Carbon Adsorbers	1	1	0	1
Chloroprene Process Vents & Storage Tanks	1	1	0	1
Chloroprene Wastewater Group 1	1	1	0	1
Periodic Reports				
Flares	19	2	0	38
PRDs	19	2	0	38
Continuous Maintenance Vents	19	2	0	38
Batch Maintenance Vents	19	2	0	38
Bypass Lines	0	2	0	0
HEX El Paso Method	19	2	0	38
Storage Vessel Routine Maintenance	19	2	0	38
Carbon Adsorbers	1	2	0	2
Pressure Vessels	19	2	0	38
Chloroprene Process Vents & Storage Tanks	1	2	0	2
Chloroprene Wastewater Group 1	1	2	0	2
Fenceline Monitoring				
Site-specific monitoring plan	12	1	0	12
Corrective action plan	12	1	0	12
Quarterly reports	12	4	0	48
TOTAL				442

The number of total annual responses is 442 over the first three years after finalizing the amendments.

6(e) Bottom Line Burden Hours and Cost Tables

(i) The Respondent Tally

The total annual labor hours for respondents are 8,130 at a cost of \$804,000. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 18 hours per response. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1.

The total annual capital/startup and O&M costs to the regulated entity are \$2.68 million. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance Costs.

(ii) The Agency Tally

The average annual burden over the first three years for the Agency is estimated to be 994 hours at a cost of \$48,600. The Agency burden hours and costs are presented in Tables 5 through 8 of Attachment 1.

6(f) Reasons for change in burden

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

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be 18 hours per response. Burden means total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB Control Numbers for EPA regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2022-0730. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2022-0730 and OMB Control Number 2060-0665 in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

TABLES 1, 2, 3, 4, 5, 6, 7, and 8

Refer to the Excel workbook that corresponds to this Supporting Statement.

