

U.S. Environmental Protection Agency

Information Collection Request

TITLE: NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal)

OMB CONTROL NUMBER: 2060-0071

EPA ICR NUMBER: 0186.17

ABSTRACT:

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Vinyl Chloride (40 CFR Part 61, Subpart F) were proposed on December 24, 1975; promulgated on October 21, 1976; and most recently amended on July 10, 1990. These regulations apply to existing facilities and new facilities that produce ethylene dichloride (EDC) by reaction of the following: (1) oxygen and hydrogen chloride with ethylene; (2) vinyl chloride (VC) by any process; and (3) one or more polymers containing any fraction of polymerized VC (i.e., polyvinyl chloride (PVC)). This subpart does not apply to equipment used in research and development if the reactor used to polymerize the VC has a capacity of no more than 0.19 cubic meters (m³). New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 61, Subpart F.

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 three years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

All of the EDC, PVC and VC facilities in the United States are owned and operated by the vinyl chloride industry (aka: the "Affected Public"). The burden to the Affected Public may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal). The 'burden' to the "Federal Government" is attributed entirely to work performed by either Federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and

Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal). There are approximately 25 facilities, which are owned and operated by the vinyl chloride industry. None of the 25 facilities in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 25 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

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

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

The relevant regulatory text is referenced in section 4(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements, which includes a description of the data elements being collected under the ICR, as identified in section 4(b)(i) of this document. This NESHAP does not require electronic reporting, and the Agency has not developed specific reporting forms for this subpart for use within CEDRI. The list of rules and required reports available in CEDRI are available at <https://www.epa.gov/electronic-reporting-air-emissions/cedri>. The notifications and reports required of respondents may be submitted to the authority by any appropriate method such as paper letter or electronic data file. A description of the EPA's consultation with respondents and how EPA responded to any concerns raised by respondents or other stakeholders is discussed in sections 3(b) and 3(c) of this document.

Supporting Statement A

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, vinyl chloride emissions from EDC, PVC, and VC plants 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 61, Subpart F.

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 these emission standards. Continuous emission monitors are used to ensure 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 are used to inform the Agency or 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 the standards are being met. The performance test may also be observed.

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

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.

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 state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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 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).

With the following exception, these reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 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 the standard, 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 25 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Chemistry Council at (202) 249-7000 and the Vinyl Institute at (202) 974-5310. In this case, no comments were received.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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 (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 the standard 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.*
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12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are EDC, PVC, and VC plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by these

standards is SIC 2821 which corresponds to the North American Industry Classification System (NAICS) 325211 for Plastics Material and Resin Manufacturing.

Based on our research for this ICR, on average over the next three years, approximately 25 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 25 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	25	0	0	25
2	0	25	0	0	25
3	0	25	0	0	25
Average	0	25	0	0	25

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 25.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0

Total Annual Responses				
Notification of actual startup	0	1	0	0
Notification of emission testing	0	1	0	0
Notification of test report	0	1	0	0
Notification of physical or operational change	0	1	0	0
Application for waiver of testing	0	1	0	0
Application of equivalency	0	1	0	0
Initial report	0	1	0	0
Quarterly report	25	4	0	100
MVV/RVD report	25	1	0	25
			Total	125

The number of Total Annual Responses is 125.

The total annual labor costs are \$1,290,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost - NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F).

A source must make the following reports:

Notifications	
Notification and application of construction or modification	§61.07
Notification of anticipated date of initial startup	§61.09(a)(1)
Notification of actual startup	§61.09(a)(2)
Notification of emissions testing	§61.13(c)
Application for waiver of testing	§61.13(i)
Notification of physical or operational change which may increase the emission rate	§61.15
Application for equivalent equipment and procedures	§61.66

Reports	
Report of emission tests	§61.13(f)
Manual vent valve (MVV) discharge report	§61.64(a)(3)
Relief valve discharge (RVD) report	§61.65(a)
Initial report	§61.69
Quarterly report	§61.70

A source must keep the following records:

Recordkeeping	
Emission test results and other data needed to determine emissions	§§61.13(g), 61.71(a)(3)
Startup, shutdown, malfunction, periods where the continuous monitoring system is inoperative	§61.14(f)
Performance test records, leaks detected, emissions records, and daily operating records are required to be retained on-site for three years	§§61.67(f), 61.71(a)
Records of leak detected	§§61.71(a)(1), 61.71(a)(2)
Daily operating record for each polyvinyl chloride reactor, including pressures and temperatures	§61.71(a)(4)

12c. RESPONDENT ACTIVITIES

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate vinyl chloride CMS.
Perform initial performance test, Reference Method 106, 107, and/or 601 tests, 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.

Respondent Activities
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.

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 10,210 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

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.” 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.

The total annual labor hours are 10,210. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 82 hours per response.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startu p Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startu p Cost, (B X C)	(E) Annual O&M Costs for One Respondent ^a	(F) Number of Respondent s with O&M	(G) Total O&M, (E X F)
CEMS	\$212,000	0	\$0	\$63,816	25	\$1,595,412
Totals (rounded) ^b			\$0			\$1,600,000

^a Capital/startup costs and O&M costs have been updated from 2008 dollars to 2022 dollars using the CEPCI CE Index.

^b Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,600,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$1,600,000. These are recordkeeping costs.

The total annual capital/startup and O&M costs to the regulated entity are \$1,600,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) 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

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

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

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 these emission standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

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

14b. Agency Burden and Labor Cost

Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records

maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$61,100.

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 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 – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

The average annual Agency burden and cost over next three years is estimated to be 1,150 labor hours at a cost of \$61,100. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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.

The increase in burden from the most recently approved ICR is an adjustment due to an increase in the number of existing sources. There was an increase of nine sources compared to the previous ICR. This increase in the number of sources is based on updated information collected by the U.S. EPA for other related rulemakings. Additionally, the O&M costs increase due to an adjustment from 2008 \$ to 2022 \$ using the CEPCI CE Index.

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.

Although this rule does not require electronic reporting, respondents could choose to submit notifications or reports electronically. All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

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.

Table 1: Annual Respondent Burden and Cost - NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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)	Cost (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements ^c	1	4	4	25	100	5	10	\$14,500.95
B. Required activities								
Initial performance test ^d	60	1	60	0	0	0	0	\$0
Repeat performance tests ^e	60	0.2	12	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write Report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0

Notification of emission testing	2	1	2	0	0	0	0	\$0
Notification of test report	2	1	2	0	0	0	0	\$0
Notification of physical or operational change ^f	2	1	2	0	0	0	0	\$0
Application for waiver of testing ^g	8	1	8	0	0	0	0	\$0
Application of equivalency ^h	40	1	40	0	0	0	0	\$0
Initial report	24	1	24	0	0	0	0	\$0
Quarterly report ⁱ	50	4	200	25	5,000	250	500	\$725,047.50
MVV/RVD report ^j	8	1	8	25	200	10	20	\$29,001.90
Subtotal for Reporting Requirements					6,095			\$768,550
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3D							
D. Develop record system	N/A							
E. Time to enter information								
Records of reactor parameters and emission ^k	0.25	365	91.25	25	2,281	114	228.125	\$330,802.92
Records of leaks detected ^l	1	52	52	25	1300	65	130	\$188,512.35
F. Time to train personnel	N/A							

G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					4,118			\$519,315
TOTAL LABOR BURDEN AND COSTS (rounded) ^m					10,210			\$1,290,000
TOTAL CAPITAL AND O&M COST (rounded) ^m								\$1,600,000
GRAND TOTAL (rounded) ^m								\$2,890,000

Assumptions:

^a We estimate there are 25 existing sources subject to the standard and no additional sources will become subject over the three-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 all sources will have to familiarize with the regulatory requirements quarterly.

^d We have assumed that it will take 60 hours to complete the performance tests.

^e We have assumed that 20 percent of initial performance tests must be repeated due to failure.

^f Assumed that there will be no physical or operational changes over the next three years.

^g Assume it will take eight hours to prepare application for waiver of testing.

^h Assume it will take 40 hours to prepare application for equivalency.

ⁱ We have assumed that it will take 50 hours to prepare the quarterly report.

^j We have estimated that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.

^k Assume that affected facilities will operate 365 days per year as required of all facilities that are subject to the rule.

^l It is estimated that respondents will enter records of leak detection 52 times per year.

^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Vinyl Chloride (40 CFR Part 61, Subpart F) (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	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
1. Initial performance test ^c	24	1	24	0	0	0	0	\$0
2. Repeat performance test ^d	24	0.2	4.8	0	0	0	0	\$0
3. Report review								
Notification of construction/reconstruction	1	1	1	0	0	0	0	\$0
Notification of anticipated startup	0.5	1	0.5	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of emission testing	0.5	1	0.5	0	0	0	0	\$0
Notification of physical or operational change ^e	0.5	1	0.5	0	0	0	0	\$0
Emission test report ^f	24	1	24	0	0	0	0	\$0
Application for waiver of testing ^g	24	1	24	0	0	0	0	\$0
Application for equivalency	24	1	24	0	0	0	0	\$0
Initial report	24	1	24	0	0	0	0	\$0

Quarterly report ^h	4	4	16	25	400	20	40	\$24,454
MVV/RVD report ⁱ	24	1	24	25	600	30.0	60.0	\$36,681
TOTAL ANNUAL BURDEN (rounded) ^j					1,150			\$61,100

Assumptions:

^a We estimate there are 25 existing sources subject to the standard and no additional sources will become subject over the three-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 \$73.46 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$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 government employees.

^c We have assumed that it will take twenty-four hours to complete the performance tests.

^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.

^e Assume that there will be no physical or operational changes over the next three years.

^f It is assumed that it will take twenty-four hours to review an emissions test report.

^g Assume that it will take twenty-four hours to review application for waiver of test.

^h We have assumed that it will take four hours to review the quarterly report.

ⁱ We have assumed that there will be one manual vent valve/relief valve discharge (MVV/RVD) per year.

^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.