

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)

**OMB Control Number:** 2060-0682

**EPA ICR Number:** 2457.05

**Abstract:** The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) were proposed on March 29, 1995; promulgated on September 12, 1996; and most-recently amended on March 27, 2014. These regulations apply to each new and existing thermoplastic product process units (TPPU) and associated equipment that produce the subset of polymers and resins known as “Group IV Polymers and Resins” that is a major source of organic hazardous air pollutants (HAPs). Group IV polymers and resins include the following source categories: Acrylonitrile Butadiene Styrene (ABS), Methyl Methacrylate Acrylonitrile Butadiene Styrene (MABS), Methyl Methacrylate Butadiene Styrene (MABS), Nitrile Resin, Polyethylene Terephthalate (PET), Polystyrene (PS), and Styrene Acrylonitrile (SAN). This information is being collected to assure compliance with 40 CFR Part 63, Subpart JJJ. Over the next three years, approximately 27 affected process units (TPPUs) at 24 facilities (i.e., respondents) per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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 12(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements as identified in section 12(b) of this document as requested. All electronic collection in this information collection is submitted through EPA's CEDRI, as discussed in section 12(b) of this document. Additional Paperwork Reduction Act requirements for CEDRI, including the burden statement and OMB control number, are

available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal. 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 section 8 of this document. Per the Terms of Clearance on the previous ICR, this supporting statement follows the standard 18-question format.

## **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.*

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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 TPPUs and associated equipment that produce Group IV polymers and resins 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 JJJ.

### **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.*

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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 ensure compliance with these

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 the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and 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.

### **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.*

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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 amended to include electronic reporting provisions on March 27, 2014 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and performance evaluation 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 certain notifications through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

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**

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*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.*

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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 BUSINESSES AND SMALL ENTITIES**

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

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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. CONSEQUENCES 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.*

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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 OMB guidelines.*

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

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

## **8. PUBLIC COMMENT AND CONSULTATIONS**

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### **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 (89 FR 63933) on August 6, 2024. 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 six 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 Plastics Industry Association at 202- 974-5200, and the American Composites Manufacturers Association at 703-525-0511. 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.*

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No payments or gifts are made to respondents.

## **10. ASSURANCE OF CONFIDENTIALITY**

*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.*

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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.*

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

## **12. RESPONDENT BURDEN HOURS & 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. Generally, estimates should not include burden hours for customary and usual business practices.*
  - *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 owners or operators of any existing or new TPPUs and associated equipment that produce Group IV polymers and resins that are a major source of HAP emissions. The United States Standard Industrial Classification (SIC) code for the

respondents affected by the standards is SIC 2821, which corresponds to the North American Industry Classification System (NAICS) 325211 for Plastic Material and Resin Manufacturing.

Based on our research for this ICR, on average over the next three years, approximately 24 existing respondents will be subject to the standard. It is estimated that no additional new respondents per year will become subject, for an overall total of 24 respondents per year. The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, 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 1.1 affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the table Total Annual Responses shown below. The number of Total Annual Responses is 218.

**12b. Information Requested**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ). 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.

A source must make the following reports:

<b>Notifications</b>	
Notification of Compliance Status	§63.1331(a)(4), §63.1335(e)(5)
Notification of storage vessel inspection	§63.1335(e)(7)(i)
Notification of performance tests	§63.1333(a)(4)
Requirements for batch process vents in the Notification of Compliance Status	§63.1327(a)
PCCT requirements in Notification of Compliance Status	§63.1329(c)(3)
Notification of alternative test method	§63.7(f)
Notification of special compliance requirements	§63.9(d)

<b>Notifications</b>	
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)

<b>Reports</b>	
Reports of malfunctions	§63.1335(b)(1)(ii)
Pre-compliance report for requesting an extension of compliance; requesting approval to use alternative monitoring parameters, alternative continuous monitoring and recordkeeping or alternative controls; requesting approval to use engineering assessment to estimate emissions from a batch emissions episode; or wishing to establish parameter monitoring levels according to the procedures in §63.1334(c) or (d)	§63.9(c), §63.1335(e)(3)
Progress report for affected sources that receiving an extension of compliance	§63.10(d)(4)
Emissions averaging plan	§63.1335(e)(4)
Semiannual or quarterly periodic reports	§63.1335(e)(6)
Request of approval for a nominal control efficiency for use in calculating credits for an emissions average	§63.1335(e)(7)(ii)
Report of changes to the primary product for a TPPU or process unit as required by §§63.1310(f)(3)(iii), 63.1310(f)(9), or 63.1310(f)(10)(iii)(C)	§63.1335(e)(7)(iii)
Report of newly constructed/reconstructed sources subject to §63.1310(i)(1) or (i)(2) including a description of the process change or addition, planned start-up date and appropriate compliance date, and identification of the group status of emission points (except equipment leak components subject to §63.1331).	§63.1335(e)(7)(iv)
Operating permit application	§63.1335(e)(8)
PRD requirements in Periodic reports	§63.1335(e)(6)(xiii)
Equipment leak requirements in Periodic reports	§63.1331(a)(5),



<b>Reports</b>	
	§63.182(a)(3), §63.182(d)
Equipment leak requirements in Periodic reports for “multiple-end-finisher” subcategory	§63.1331(c)(4)
PCCT requirements in Periodic reports for “multiple-end-finisher” subcategory	§63.1329(c)
Reports for PET and polystyrene affected sources using a control or recovery device to comply with §63.1316	§63.1315(a), §63.1320(a)
Report for PET affected sources using a dimethyl terephthalate process	§63.1320(b)
Reports for batch process vents	§§63.1327(b)-(g)
Performance test reports (electronic submission)	§63.1335(e)(9)

A source must keep the following records:

<b>Recordkeeping</b>	
Records must be maintained for 5 years.	§63.1335(a)
Record of information, data, and analyses used to document the basis for the determination that the TPPU does not use or manufacture any organic HAP	§63.1310(b)
Record of malfunctions	§63.1335(b)(1)(i)
Record of data values measured by monitoring system	§63.1335(d)(1)
Record of measured data value or block average values for 1 hour or shorter periods calculated from all measured data values during each period	§63.1335(d)(2)
Record of daily average (or batch cycle daily average) values of each continuously monitored parameter	§63.1335(d)(3)
Record of all recorded values for a given monitored parameter during an	§63.1335(d)(6)

<b>Recordkeeping</b>	
operating day are within the limits established in the Notice of Compliance Status or operating permit	
Record of times and durations of breakdowns, repairs, calibration checks, zero (low-level) and high-level adjustments, or periods of non-operation	§63.1335(d)(7)
Record of CMS calibration checks and maintenance	§63.1335(d)(8)
Record required as a condition of a waiver of recordkeeping or reporting requirements	§63.1335(d)(9)
List of identification numbers for PRDs equipped with closed-vent system and control device, subject to provisions in §63.1331(a)(9)(iv)	§63.1335(d)(10)(i)
List of identification numbers for PRDs subject to provisions in §63.1331(a)(9)(i)	§63.1335(d)(10)(ii)
List of identification numbers for PRDs equipped with rupture disks, subject to provisions in §63.1331(a)(9)(ii)(B)	§63.1335(d)(10)(iii)
Record of the dates and results of the Method 21 of 40 CFR Part 60, Appendix A, monitoring following a pressure release for each PRD subject to provisions in §63.1331(a)(9)(i) and (ii).	§63.1335(d)(10)(iv)
Record of pressure release to the atmosphere for PRDs in organic HAP service subject to §63.1331(a)(9)(iii)	§63.1335(d)(10)(v)
Records for PET and polystyrene affected sources using a control or recovery device to comply with §63.1316	§63.1315(a), §63.1319(a)
Record for demonstrating compliance with the applicability determination procedure for PET affected sources using a dimethyl terephthalate process	§63.1319(b)
Record for PET and polystyrene affected sources demonstrating compliance with temperature limits for final condensers	§63.1319(b)
Group determination records for batch process vents	§63.1326(a)
Compliance demonstration records for batch process vents or aggregate batch vent stream	§63.1326(b)

<b>Recordkeeping</b>	
Establishment of parameter monitoring level records for batch process vents	§63.1326(c)
Group 2 batch process vent continuous compliance records	§63.1326(d)
Controlled batch process vent continuous compliance records	§63.1326(e)
Aggregate batch vent stream continuous compliance records	§63.1326(f)
Documentation supporting the establishment of the batch mass input limitation for batch process vents	§63.1326(g)

### 12c. Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature, pH, scrubber liquid flow rates and pressure, pressure drop, gas flow rates, and specific gravity of the absorbing liquid for control devices.
Perform initial performance test, Reference Methods 1 or 1A, 2, 2A, 2C, or 2D, 18, 21, 25A, 26 or 26A, and 301 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.
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 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.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 141,000 hours (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	\$172.41 (\$82.10 + 110%)
Technical	\$141.75 (\$67.50 + 110%)
Clerical	\$71.36 (\$33.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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.

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.

### **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*

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*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.*

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

The total capital/startup costs for this ICR are \$0. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are \$ 10,300,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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 \$10,300,000.

#### **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.*

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##### **14a. Agency Activities**

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

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

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

##### **14b. Agency Labor Cost**

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with 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 burden and cost during the three years of the ICR is estimated to be 812 hours at a cost of \$45,200. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

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

Managerial	\$76.92 (GS-13, Step 5, \$48.07 + 60%)
Technical	\$57.07 (GS-12, Step 1, \$35.67 + 60%)
Clerical	\$30.88 (GS-6, Step 3, \$19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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 Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

#### **14c. Agency Non-Labor Costs**

There are no non-labor costs to the Agency associated with this information collection.

#### **15) REASONS FOR CHANGE IN BURDEN**

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

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There is no change in burden from the most recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. There is an adjustment increase in the capital/startup or operation and maintenance (O&M) costs, which have been adjusted to reflect 2023 dollars using the CEPCI CE index. This ICR also uses labor rates from the most recent Bureau of Labor Statistics report (December 2023) 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.*

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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 EXPIRATION DATE**

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

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EPA will display the expiration date for OMB approval of the information collection.

#### **18) CERTIFICATION STATEMENT**

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

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There are no exceptions to the topics of the certification statement.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)**

<b>Burden Item</b>	<b>(A) Person- hours per occurrenc e</b>	<b>(B) Number of occurrences per year</b>	<b>(C) Person- hours per respondent  (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours (E=CxD)</b>	<b>(F) Managemen t person- hours (F=Ex0.05)</b>	<b>(G) Clerical person- hours (G=Ex0.1)</b>	<b>(H) Total Cost <sup>b</sup> (\$)</b>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	N/A							
4. Reporting Requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	40	1	40	24	960	48	96	\$151,206.24
B. Required activities <sup>d</sup>	6.08	13	79	27	2,134	107	213	\$336,131.47
C. Create information <sup>d</sup>	17.85	99	1,767	27	47,713	2,386	4,771	\$7,515,115.51
D. Gather existing information <sup>d</sup>	2.5	677	1,693	27	45,698	2,285	4,570	\$7,197,653.28
E. Write report								\$0
Notification of compliance status	20	1	20	0	0	0	0	\$0
Notification of storage vessel inspection <sup>e</sup>	5	6	30	24	720	36	72	\$113,404.68
Notification of performance tests	10	1	10	0	0	0	0	\$0
Notification of alternative test method <sup>f</sup>	5	1	5	0	0	0	0	\$0
Notification of special compliance requirements <sup>g</sup>	5	1	5	0	0	0	0	\$0
Report of newly constructed/reconstructed source	2	1	2	0	0	0	0	\$0
Operating permit application	40	1	40	0	0	0	0	\$0
Precompliance report <sup>h</sup>	40	1	40	0	0	0	0	\$0
Progress reports for affected sources receiving an extension of compliance <sup>i</sup>	4	2	8	0	0	0	0	\$0



Emissions averaging plans <sup>j</sup>	120	1	120	0	0	0	0	\$0
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging <sup>j</sup>	2	1	2	0	0	0	0	\$0
Updates to emissions averaging plan <sup>k</sup>	20	1	20	1	20	1	2	\$3,150.13
Semiannual periodic reports <sup>l</sup>	80	2	160	23	3,680	184	368	\$579,623.92
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting <sup>l</sup>	80	4	320	4	1,280	64	128	\$201,608.32
Semiannual periodic reports (PRD monitoring)	5.5	2	11	27	297	15	30	\$46,779.43
Semiannual periodic reports (Equip. leaks)	3	2	6	1	6	0.3	0.6	\$945.04
Semiannual periodic reports (PCCT)	1	2	2	1	2	0.1	0.2	\$315.01
Report of changes to the primary product for a TPPU or process unit <sup>m</sup>	2	1	2	3	6	0.3	0.6	\$945.04
Report for batch process vents <sup>n</sup>	2	1	2	3	6	0.3	0.6	\$945.04
Report for PET sources using a dimethyl terephthalate process <sup>o</sup>	2	1	2	2	4	0.2	0.4	\$630.03
Malfunction Reports <sup>p</sup>	8	1	8	3	24	1.2	2.4	\$3,780.16
Affirmative defense	30	-	-	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>117,932</b>		<b>\$16,152,233</b>
5. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 4A							
B. Plan activities <sup>d</sup>	See 4B							
C. Implement activities <sup>d</sup>	See 4B							
D. Develop record system	40	1	40	0	0	0	0	\$0
E. Time to enter information <sup>d</sup>								
Plan Activities	See 4B							
Create, Test, Research, Develop	See 4C							

Gather information, Monitor, Inspect	See 4D							
Process, Compile, Review	20	1	20	27	540	27	54	\$85,053.51
F. Time to train personnel <sup>d</sup>	5.25	4	21	27	567	28	57	\$89,306.19
G. Time to Record and disclose information <sup>d</sup>	17.46	26	454	27	12,258	613	1,226	\$1,930,714.68
H. Store, file and maintain records <sup>d</sup>	6.77	35	237	27	6,399	320	640	\$1,007,884.09
I. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>22,729</b>		<b>\$3,112,958</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>q</sup></b>						<b>141,000</b>		<b>\$19,300,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>q</sup></b>								<b>\$10,300,000</b>
<b>GRAND TOTAL (rounded) <sup>q</sup></b>								<b>\$29,600,000</b>

**Assumptions:**

<sup>a</sup> We assume there are an average of 27 sources (TPPUs) at 24 facilities subject to the rule and no additional sources per year will become subject to the rule during the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates are 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.

<sup>c</sup> This ICR assumes all existing sources will have to familiarize with the regulatory requirements each year.

<sup>d</sup> Since the activities within each burden category (i.e., process vents, equipment leaks, wastewater, heat exchangers, and equipment leaks) can vary significantly, it is too inaccurate to assume an average activity time (Column A) to calculate hours per facility (Column C). Therefore, we estimated the total hours per facility and the number activities per year (Column B) to back-calculate the person-hrs per occurrence value in Column A. The burden for these activities are based on the approach used in the HON (Subparts F, G, H, and I). Since so much variability exists, it is important to note that this is an estimate and is only used to back-calculate Column A.

<sup>e</sup> This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

<sup>f</sup> This ICR assumes that 5% of new sources will use alternative test methods.

<sup>g</sup> This ICR assumes that 5% of new sources will use special compliance requirements.

<sup>h</sup> This ICR assumes that 10% of new sources will have to submit precompliance reports.

<sup>i</sup> This ICR assumes that all existing sources are already in compliance; new sources cannot receive compliance extensions.

<sup>j</sup> This ICR assumes 10% of existing facilities have elected to use emission averaging and that all existing respondents were expected to be in compliance with the submittal of an emissions averaging plan as of the 2014 final rule. New facilities cannot use emissions averaging, therefore no new emissions averaging plans will be submitted. This ICR also assumes no existing facilities will elect to use nominal control after submitting the initial emissions averaging plan.

<sup>k</sup> This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan.

<sup>l</sup> This ICR assumes that 5% of the 27 sources (TPPUs) will not qualify for semiannual reports and will be required to submit quarterly reports. ( $27 \text{ TPPUs} \times 0.05 = 1.35$ ) In addition, 10% of the 24 facilities using emissions averaging are required to submit quarterly reports. ( $24 \text{ respondents} \times (0.10) = 2.4$ ). Therefore we estimate quarterly reports will be submitted for 4 sources. ( $1.35 + 2.4 = 3.75$ , rounded to 4) The remaining 23 sources will all submit semiannual reports.

<sup>m</sup> This ICR assumes that 10% of sources will have changes to their primary product. ( $27 \text{ sources} \times 0.10 = 2.7$ , rounded to 3)

<sup>n</sup> This ICR assumes that 10% of sources will make changes to batch process vents. ( $27 \text{ sources} \times 0.10 = 2.7$ , rounded to 3)

<sup>o</sup> This ICR assumes that 10% of PET sources will make changes to a dimethyl terephthalate process. There is a total of 15 PET facilities subject to the rule. ( $15 \text{ facilities} \times 1.1 \text{ sources/facility} \times 10\% = 1.65 \text{ sources}$ , rounded to 2)

<sup>p</sup> This ICR assumes that 10% of sources will have to submit malfunction reports. ( $27 \text{ sources} \times 0.10 = 2.7$ , rounded to 3)

<sup>q</sup> 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 Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) Number of occurrences per year	(C) EPA Person- hours per plant (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technica l person- hours (E=CxD)	(F) Management person- hours (F=Ex0.05)	(G) Clerical person- hours (G=Ex0.1 )	(H) Total Cost <sup>b</sup> (\$)
Activity								
1. Performance Tests: Initial	40	1	40	0	0	0	0	\$0
2. Performance Tests: Repeat <sup>c</sup>	40	1	40	0	0	0	0	\$0
Reports Review:								
1. Initial <sup>d</sup>	2	1	2	0	0	0	0	\$0
2. Implementation plan, pre-compliance report or permit <sup>d</sup>	20	1	20	0	0	0	0	\$0
3. Compliance status <sup>d</sup>	40	1	40	0	0	0	0	\$0
4. Review equipment leak monitoring <sup>d</sup>	7	1	7	27	189	9	19	\$12,096.76
5. Report of construction/reconstruction <sup>d</sup>	2	1	2	0	0	0	0	\$0
6. Notification of performance test <sup>d</sup>	2	1	2	0	0	0	0	\$0
7. Notification of storage vessel inspection <sup>e</sup>	2	6	12	24	288	14	29	\$18,433.15
8. Review updates to emission averaging plan <sup>f</sup>	5	1	5	1	5	0.25	0.5	\$320.02
9. Review report of changes to the primary product for a TPPU or process unit <sup>g</sup>	2	1	2	3	6	0.3	0.6	\$384.02
10. Review report for batch process vents <sup>h</sup>	2	1	2	3	6	0.3	0.6	\$384.02
11. Review report for PET sources using dimethyl terephthalate process <sup>i</sup>	2	1	2	2	4	0.2	0.4	\$256.02
12. Review of test results <sup>d</sup>	8	1	8	0	0	0	0	\$0
13. Review malfunction reports <sup>j</sup>	2	1	2	3	6	0.3	0.6	\$384.02

14. Review semiannual periodic reports <sup>d, k</sup>	3	2	6	23	138	6.9	14	\$8,832.55
15. Review of quarterly periodic reports <sup>d, k</sup>	4	4	16	4	64	3	6	\$4,096.26
<b>TOTAL (rounded) <sup>e</sup></b>						<b>812</b>		<b>\$45,200</b>

**Assumptions:**

<sup>a</sup> We assume there are an average of 27 sources at 24 facilities subject to the rule and no additional sources per year will become subject to the rule during the three-year period of this ICR.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 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.

<sup>c</sup> This ICR assumes 20% of sources will have to repeat performance tests.

<sup>d</sup> The burden for these activities are based on similar requirements in the HON (Subparts F, G, H, and I). The HON describes these activities as follows:

1. Initial represents the EPA review of all initial reports received.
2. Implementation plan or permit represents the EPA review of all implementation plans, or permit applications if submitted in lieu of an implementation plan.
3. Compliance status represents compliance status verification by the EPA for the portions of the standard which a source must comply with before the compliance date.
4. Review equipment leak monitoring represents the review and screening of periodic reports received as a result of the equipment leaks standard.
5. Report of construction/reconstruction represents the EPA review of this notification from new sources.
6. Notification of performance test represents the EPA review of this notification from new sources.
7. Review of test results represents the EPA review of performance test results for new sources.
8. Review periodic reports represents the EPA review of periodic reports.

<sup>e</sup> This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

<sup>f</sup> This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan. This activity may also include review of front-end or back-end operations limits.

<sup>g</sup> This ICR assumes that 10% of sources will have changes to their primary product.

<sup>h</sup> This ICR assumes that 10% of sources will makes changes to batch process vents.

<sup>i</sup> This ICR assumes that 10% of PET sources will make changes to a dimethyl terephthalate process. There is a total of 15 PET facilities subject to the rule. (15 facilities x 1.1 sources/facility x 10% = 1.65 sources, rounded to 2)

<sup>j</sup> This ICR assumes that 10% of sources will have to submit malfunction reports.

<sup>k</sup> This ICR assumes that 5% of the 27 sources (TPPUs) will not qualify for semiannual reports and will be required to submit quarterly reports. (27 TPPUs x 0.05 = 1.35) In addition, 10% of the 24 facilities using emissions averaging are required to submit quarterly reports. (24 respondents x (0.10) = 2.4). Therefore we estimate quarterly reports will be submitted for 4 sources. (1.35 + 2.4 = 3.75, rounded to 4) The remaining 23 sources will all submit

semiannual reports.

<sup>1</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>a</sup>	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	Number of Respondents (E=A+B+C-D)
1	0	24	0	0	24
2	0	24	0	0	24
3	0	24	0	0	24
Average	0	24	0	0	24

<b>Total Annual Responses</b>				
(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 E=(BxC)+D
Notification of compliance status	0	1	0	0
Notification of storage vessel inspection	24	6	0	144

Notification of performance tests	0	1	0	0
Notification of alternative test method	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Pre-compliance report	0	1	0	0
Progress reports for affected sources receiving an extension of compliance	0	2	0	0
Emissions averaging plans	0	1	0	0
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging	0	1	0	0
Updates to emissions averaging plan	1	1	0	1
Report of changes to the primary product for a TPPU or process unit	3	1	0	3
Report of newly constructed/reconstructed source	0	1	0	0
Operating permit application	0	1	0	0
Report for batch process vents	3	1	0	3
Report for PET sources using a dimethyl terephthalate process	2	1	0	2
Malfunction Reports	3	1	0	3
Semiannual reports <sup>a</sup>	23	2	0	46
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting	4	4	0	16

<b>Total (rounded) <sup>b</sup></b>				<b>218</b>
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<sup>a</sup> There are 27 affected sources (PRD) monitored at 24 facilities. For the 23 sources qualifying for semiannual reports, this information will be included in the required periodic report and is not considered a separate response. For the 4 sources required to submit quarterly reports, we assume this information will be submitted quarterly as a separate report.

<sup>b</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Burden	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent <sup>a</sup>	Number of Respondents with O&M	Total O&M, (ExF)
Electronic indicators for PRD <sup>a</sup>	\$22,063	0	\$0	\$0	0	\$0
Monitoring equipment for process vents and wastewater <sup>b</sup>	\$34,625	0	\$0	\$380,876	27	\$10,283,644
Monitoring equipment for equipment leaks <sup>b</sup>	\$1,939	0	\$0	\$0	0	\$0
<b>Total (rounded) <sup>c</sup></b>			<b>\$0</b>			<b>\$10,300,000</b>

<sup>a</sup> Based on costs from the 2014 final rule, the total capital cost for the electronic indicators for PRDs across all facilities is estimated to be \$3,814,120 (see ICR No. 2457.02). This cost has been annualized by multiplying the capital recovery factor by the capital cost. The capital recovery factor is based on an interest rate of 7 percent and an assumed equipment life of 10 years. (Capital cost per monitoring system = \$3,814,120 x 0.142 / 34 monitoring system = \$15,930/monitoring system. Costs have been adjusted from 2014 dollars to 2023 dollars using the CEPCI CE index. The operation and maintenance (O&M) costs expected from operating the electronic indicators is assumed to be minimal.

<sup>b</sup> Capital and O&M costs for process vents, wastewater, and equipment leaks are based on estimates for similar requirements in the HON (Subparts F, G, H and I). The HON uses the following assumptions:

1. Subpart G

*-Total Capital/Startup Cost of Monitoring Equipment:* The cost to purchase monitoring equipment is approximately \$20-30K for process vents and wastewater operations, or an average of \$25K with a 10-year life expectancy and a 7 percent depreciation rate, or \$2,225 per year. Costs have been adjusted from 2014 dollars to 2023 dollars using the CEPCI CE index. There are no associated costs for transfer racks and storage tanks. Only new sources need to buy monitoring equipment.

*-Total Cost of Operation and Maintenance of Monitoring Equipment:* The cost to industry associated with the operation and maintenance (O&M) is approximately \$100-500K per year (capital/startup depreciation not included) for reactor process vents and wastewater operations. The cost associated with the operation and maintenance is \$50-100K per year (capital/startup depreciation not included) for distillation unit process vents. There are no associated costs for transfer racks and storage tanks. The average O&M cost is assumed to be the average of the two



ranges, or \$275,000 per year. Costs have been adjusted from 2014 dollars to 2023 dollars using the CEPCI CE index. Operation and maintenance incur for both new and existing sources.

## 2. Subpart H

*-Total Capital/Startup Cost of Monitoring Equipment:* Only new sources will buy an organic volatile analyzer. Estimate the average cost of a monitor is \$7,000 with a 5-year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is, therefore, \$7,000/5, or \$1,400/yr. Costs have been adjusted from 2014 dollars to 2023 dollars using the CEPCI CE index.

*-Total Cost of Operation and Maintenance of Monitoring Equipment:* The operation of the monitors is included in the monitoring equipment costs. Maintenance costs on these units is incidental; therefore, no maintenance or operation costs are incurred.

3. The HON does not estimate any capital or O&M costs for Subparts F and I.

<sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.