

ICR Summary Information	
Hours Per Response	36
Number of Respondents	12
Total Estimated Burden Hours	869
Total Estimated Costs	\$118,000
Annualized Capital O&M	N/A
Form Number	N/A

**Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Fle:
(Renewal)**

Burden Item	A	B
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year
1. Applications	N/A	N/A
2. Survey and studies	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A
4. Reporting Requirements		
A. Familiarization with instructions	1	1
B. Required Activities		
Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12
C. Create Information	Included in 4B and 5E	
D. Gather Existing Information	Included in 4B and 5E	
E. Write Report		
Initial notification ^d	2	1
Notification of modification/reconstruction ^d	2	1
Notification of Special Compliance Requirements ^e	2	1
Pre-compliance Report ^d	4	1
Notification of Compliance Status ^d	16	1
Semiannual Reports ^f	4	2
Annual Compliance Certifications ^g	2	1
Subtotal for Reporting Requirements	34	21
5. Recordkeeping Requirements		
A. Familiarization with instructions	Included in 4A	
B. Plan activities	Included in 4B	
C. Implement activities	Included in 4B	
D. Develop record system	40	1
E. Time to enter information: records of monitoring and operations ^a		
Slabstock producers	8	12
Molded/rebond facilities	4	1
F. Train personnel	40	1
G. Audits	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15
TOTAL LABOR BURDEN AND COSTS (rounded) ^h		
TOTAL CAPITAL AND O&M COST (rounded) ^h		
GRAND TOTAL (rounded) ^h		

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam facilities. The number of respondents per year for this ICR is estimated to be 12 and 11 of these facilities are private sector facilities.

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%). Source: U.S. Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational category and wage rate,” increased by 110 percent to account for varying industry wage rates and the additional overhead business costs associated with hiring, training, and equipping their employees.

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements and no reconstruction is needed.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the rule does not require it.

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III)

C	D	E	F	G	H
Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year ^a	Technical Person-Hours Per Year (E=CxD)	Management Person-Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Cost (\$) ^b
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
1	11	11	0.55	1.1	\$1,732.57
12	6	72	3.6	7.2	\$11,340.47
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
16	0	0	0	0	\$0
8	6	48	2.4	4.8	\$7,560.31
2	11	22	1.1	2.2	\$3,465.14
49		176			\$24,098
40	0	0	0	0	\$0
96	6	576	28.8	57.6	\$90,723.74
4	5	20	1	2	\$3,150.13
40	0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A	N/A
180		685			\$93,874
		861			\$118,000
					\$0
					\$118,000

Note to OAQPS:

Labor R
Management
Technical
Clerical

and foam producers for a total of 12 existing foam producers (i.e., respondents) that are producers commencing operations over the period of this ICR. Therefore, the average liabilities.

.0%); and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States
id industry group.” The rates are from column 1, “Total compensation.” The rates are
f employing workers beyond their wages and benefits, including business expenses

tions will occur during this ICR renewal period.
compliance date for this rule has passed.

: Previous ICRs indicated that at least one facility is owned by the federal government. This was confirmed by reviewing the 20

ates
\$172.41
\$141.75
\$71.36

014 RTR facility list. The burden has been separated into into two tables to account for private labor rates for 11 facilities (mix

of slabstock and molded/rebond sources), and federal labor rates for the 1 facility, which appears to be a molded/rebond source

Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Flex Subpart III) (Renewal)

Burden Item	A	B	C
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Person Hours Per Respondent Per Year (C=AxB)
1. Applications	N/A	N/A	N/A
2. Survey and studies	N/A	N/A	N/A
3. Acquisition, Installation, and Utilization of Tech. & Systems	N/A	N/A	N/A
4. Reporting Requirements			
A. Familiarization with instructions	1	1	1
B. Required Activities			
Monitoring of Emissions Operations, Slabstock Facilities - Storage Tank Measurements ^c	1	12	12
C. Create Information	Included in 4B and 5E		
D. Gather Existing Information	Included in 4B and 5E		
E. Write Report			
Initial notification ^d	2	1	2
Notification of modification/reconstruction ^d	2	1	2
Notification of Special Compliance Requirements ^e	2	1	2
Pre-compliance Report ^d	4	1	4
Notification of Compliance Status ^d	16	1	16
Semiannual Reports ^f	4	2	8
Annual Compliance Certifications ^g	2	1	2
Subtotal for Reporting Requirements	34	21	49
5. Recordkeeping Requirements			
A. Familiarization with instructions	Included in 4A		
B. Plan activities	Included in 4B		
C. Implement activities	Included in 4B		
D. Develop record system	40	1	40
E. Time to enter information: records of monitoring and operations ^a			
Slabstock producers	8	12	96
Molded/rebond facilities	4	1	4
F. Train personnel	40	1	40
G. Audits	N/A	N/A	N/A
Subtotal for Recordkeeping Requirements	92	15	180
TOTAL LABOR BURDEN and COSTS (rounded) ^h			
TOTAL CAPITAL AND O&M COST (rounded) ^h			
GRAND TOTAL (rounded) ^h			

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there will be 12 and 1 facility is assumed to be a molded/rebond source.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, as from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. Technical benefit packages available to government employees.

^c Molded/rebond foam producers only have recordkeeping and reporting requirements.

^d We have assumed that all existing sources are in compliance with the initial rule requirements.

^e We have determined that there will be no sources submitting a special compliance report for this ICR since the CC

^f Only slabstock foam producers are required to submit semiannual reports.

^g All respondents are required to submit annual compliance certifications.

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

ible Polyurethane Foam Product (40 CFR Part 63,

D	E	F	G	H
Respondents Per Year ^a	Technical Person- Hours Per Year (E=CxD)	Manageme nt Person Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Cost (\$) ^b
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
1	1	0.05	0.1	\$64.00
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
1	2	0.1	0.2	\$128.01
	3			\$192
0	0	0	0	\$0
0	0	0	0	\$0
1	4	0.2	0.4	\$256.01
0	0	0	0	\$0
N/A	N/A	N/A	N/A	N/A
	5			\$256
	8			\$448
				\$0
				\$448

Note to OAQPS: Previous ICRs indicated th

Labor Rates	
Management	\$76.91
Technical	\$57.07
Clerical	\$30.88

1 foam producers for a total of 12 existing foam producers (i.e.,
will be no new foam producers commencing operations over the
of these facilities is a federal government facility. This federal

; Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical
and Clerical hours are 10 percent of Technical hours. These rates are
The rates have been increased by 60 percent to account for the

compliance date for this rule has passed.

at at least one facility is owned by the federal government. This was confirmed by reviewing the 2014 RTR facility list. The bi

Costs have been separated into two tables to account for private labor rates for 11 facilities (mix of slabstock and molded/ret

bond sources), and federal labor rates for the 1 facility, which appears to be a molded/rebond source.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for F (40 CFR Part 63, Subpart III) (Renewal)

Affected Sector	Number of Responses	Labor Hours		
		Reporting	Recordkeeping	Total
Private	23	176	685	861
Public (Federal)	1	3	5	8
Total (rounded)	24	179	690	869

Flexible Polyurethane Foam Product

Labor Cost	Capital and O&M Cost
\$118,000	\$0
\$448	\$0
\$118,000	\$0

hrs/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam (Renewal)

Burden Item	A	B	C	D
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)	Plants Per Year ^a
Initial Notification ^c	2	0	0	0
Notification of Reconstruction/Modification ^c	2	1	2	0
Pre-compliance Report ^c	2	1	2	0
Notification of Special Compliance Requirements ^d	2	1	2	0
Notification of Compliance Status ^c	2	1	2	0
Semiannual Reports ^e	2	2	4	6
Annual Compliance Certifications ^f	2	1	2	12
TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that there are approximately 6 existing slabstock foam producers and 6 existing molded/rebond foam producers are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers and the average number of respondents per year for this ICR is estimated to be 12.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$39.30 (GS-13, Step 3, \$19.30 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Managerial hours. Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent for employees.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance data is already being collected.

^e Only slabstock foam producers are required to submit semiannual reports.

^f All respondents are required to submit annual compliance certifications.

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

am Product (40 CFR Part 63, Subpart III)

E	F	G	H
Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Cost (\$) ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
24	1.2	2.4	\$1,536.08
24	1.2	2.4	\$1,536.08
55			\$3,070

Labor Rates	
Management	\$76.91
Technical	\$57.07
Clerical	\$30.88

icers for a total of 12 existing foam producers (i.e., respondents) that commencing operations over the period of this ICR. Therefore, the

\$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step of Technical hours. These rates are from the Office of Personnel nt to account for the benefit packages available to government

ite for this rule has passed.

The only type of industry costs associated with the information collection activity in the regulations is

are labor costs. There are no capital/startup or operation and maintenance costs.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Initial Notification	0	0	0	0
Notification of Reconstruction/Modification	0	0	0	0
Pre-compliance Report	0	0	0	0
Notification of Special Compliance Requirements	0	0	0	0
Notification of Compliance Status	0	0	0	0
Semiannual Reports ^a	6	2	0	12
Annual Compliance Certifications ^b	12	1	0	12
			Total	24

^a Only slabstock foam producers are required to submit semiannual reports.

^b All respondents are required to submit annual compliance certifications.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
Year	(A)	(B)	(C)	(D)
	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	12	0	0
2	0	12	0	0
3	0	12	0	0
Average	0	12	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
12
12
12
12