U.S. Environmental Protection Agency
Information Collection Request

Title: NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)

OMB Control Number: 2060-0434

EPA ICR Number: 1869.13

Abstract: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) were proposed on December 14, 1998; promulgated on January 20, 2000; and amended on: April 20, 2006; October 8, 2014; October 15, 2018; and November 19, 2020. These regulations apply to both existing facilities and new facilities that manufacture amino/phenolic resins with HAP emissions points that include: (1) reactor batch process vents; (2) nonreactor batch process vents; (3) continuous process vents; (4) equipment leaks; (5) wastewater; (6) storage vessels; and (7) heat exchangers. New facilities include those that commenced construction, or modification, or reconstruction after the date of the proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart OOO.

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.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

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, hazardous air pollutant (HAP) emissions from amino/phenolic resin manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart OOO.

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 ensures 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 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 its 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 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.

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 October 8, 2014 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting

Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications required in 40 CFR 63.9(b) and (j) through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For the 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

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 BUSINESSES AND SMALL ENTITIES

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

A majority of the respondents are large entities (i.e., large businesses). According to the Final Rule (65 FR 3276):

> We have determined that, of the nineteen affected firms, only six are small businesses **. . . .** Although this final rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has tried to reduce the impact of this rule on small entities. In order to minimize the impact of the rule for leaking equipment, we

have exempted firms producing less than 881 tpy (800 Mg/yr) from complying with the requirements to have a leak detection and repair program.

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.

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.

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 these standards. The 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. The 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 either the destruction or nonexistence of essential records.

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 (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 19 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 Bakelite Chemicals, and American Foam Technologies Inc. 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.

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.

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 & 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.*

12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are amino/phenolic resins manufacturing facilities The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the table below:

Standard (40 CFR Part 63, Subpart OOO)	**SIC Codes**	**NAICS Codes**
Plastics Material and Resin Manufacturing	2821	325211

Based on our research for this ICR, on average over the next three years, approximately 19 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject, for an overall total of 19 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 one 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 115.

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO). 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:

Notifications	
Notification of intent to construct or reconstruct	§63.5, §63.1417(d)
Notification and report of construction date	§63.5, §63.1417(a)
Notification of anticipated startup	§63.5, §63.1417(a)
Actual startup notification	§63.5, §63.1417(a)
Notification of modification	§63.5, §63.1417(a)
Notification of performance tests and results	§63.7(b), §63.1417(e)
Notification of compliance status	§63.1417(e)
Notification of storage vessel inspection	§63.1417(h)(1)
Site-specific test plan	§63.1417(h)(2)
Notification of planned performance test	§63.1417(h)(3)
Notification of change in primary product	§63.1417(h)(4), §§63.1400(g)(7-8)
Notification of added emission points	§63.1417(h)(5)
Notification that a small control device has been re-designated as a large control device.	§63.1417(h)(6)
Notification of process change	§63.1417(h)(7)

Notifications	
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)

Reports	
Report of performance tests and results (electronic submission)	§63.7(b), §63.1417(e)
Pre-compliance report	§63.1417(d)
Report of compliance status	§63.1417(e)
Periodic reports (semiannual) including statement of compliance (if no exceedances occurred), daily, hatch cycle, and block average monitoring data for any periods where exceedances or excursions occur, periods of monitoring system downtime.	§63.1417(f)
Quarterly reports upon request of the Administrator	§63.1417(f)(12)
Malfunction reports	§63.1417(g)

A source must keep the following records:

Recordkeeping	
Five-year retention of records	§63.1416(a)
Malfunction records	§63.1416(b), §63.6(e)
Monitoring records	§63.1416(c)
Batch process vent records	§63.1416(d)
Aggregate batch vent stream records	§63.1416(e)

Recordkeeping	
Continuous process vent records	§63.1416(f)
Other records or documentation	§63.1416(g)
Reduced recordkeeping program	§63.1416(h)

12c. Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, pH, flow, temperature, or specific gravity, or organic monitoring device for control options as applicable.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 308, 316, or 320 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 23,300 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 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 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 $3,050,000. 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 $3,050,000.

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.

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 377 hours at a cost of $21,000. See Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal).

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%)
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 the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (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.

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: 1) these regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is either very low or non-existent, so there is no significant change in the overall burden. There is a slight increase in labor costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (December 2023) to calculate respondent burden costs. This ICR also increases the capital/startup and O&M costs from 2014 $ to 2024 $ 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.

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.

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."

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

Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year ($) [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements [c, d]	16	1	16	19	304	15	30	$47,881.98
B. Plan activities	8	1	8	19	152	8	15	$23,940.99
C. Training	16	1	16	19	304	15	30	$47,881.98
D. Create, test and research development [e, f]	320	1	320	1	320	16	32	$50,402.08
E. Gather, monitor and inspect information	208	1	208	19	3,952	198	395	$622,465.69
F. Process, compile and review	48	2	96	19	1,824	91	182	$287,291.86
G. Write Report								
1) Pre-compliance report	20	1	20	0	0	0	0	$0
2) Notification of compliance status	20	1	20	0	0	0	0	$0
3) Semiannual summary report [g]	40	2	80	19	1,520	76	152	$239,409.88
4) Activities for periodic report related to storage vessel maintenance [h]	1	1	1	15	15	1	2	$2,362.60
5) Reports of malfunctions	20	2	40	19	760	38	76	$119,704.94
6) Other reports	8	2	16	19	304	15	30	$47,881.98
7) Leak detection and repair (LDAR) reporting	60	1	60	19	1,140	57	114	$179,557.4

								1
Subtotal for Reporting Requirements					***12,184***			***$1,668,781***
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements [c, d]	See 3A							
B. Plan activities	See 3B							
C. Implement activities								
1) Malfunction records	6	2	12	19	228	11	23	$35,911.48
2a) Monitoring records	24	2	48	19	912	46	91	$143,645.93
2b) Continuous process vent records [h]	4	2	8	1	8	0.4	1	$1,260.05
3) Batch process vent records	24	2	48	19	912	46	91	$143,645.93
4) Aggregate batch vent stream records	24	2	48	19	912	46	91	$143,645.93
5) Leak detection and repair (LDAR) records	24	2	48	19	912	46	91	$143,645.93
6) Other records and documentation	24	2	48	19	912	46	91	$143,645.93
D. Develop record system								
1) Record/disclose information	16	2	32	19	608	30	61	$95,763.95
2) Store, file, maintain information [i]	4	2	8	19	152	8	15	$23,940.99
E. Time to enter information								
1) Malfunction records	4	2	8	19	152	8	15	$23,940.99
2) Monitoring records	4	2	8	19	152	8	15	$23,940.99
3a) Storage vessel - maintenance & recording info [h]	1	1	1	15	15	1	2	$2,362.60
3b) Continuous process vent records [h]	4	2	8	1	8	0.4	1	$1,260.05
4) Batch process vent records	4	2	8	19	152	8	15	$23,940.99
5) Aggregate batch vent stream records	4	2	8	19	152	8	15	$23,940.99
6) Leak detection and repair (LDAR) records	4	2	8	19	152	8	15	$23,940.99
7) Other records and documentation	8	2	16	19	304	15	30	$47,881.98
F. Time to train personnel								
1) Control equipment inspect and monitor	40	2	80	19	1,520	76	152	$239,409.8

								8
2) Leak detection and repair	40	2	80	19	1,520	76	152	$239,409.88
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***11,135***			***$1,525,135***
Total Labor Burden and Costs (rounded) [j]					**23,300**			**$3,190,000**
Total Capital and O&M Cost (rounded) [j]								**$3,050,000**
Grand Total (rounded) [j]								**$6,240,000**

Assumptions:

[a] This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject over the next three years.

[b] 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

[c] This ICR assumes that all respondents will have to familiarize with the regulatory requirements each year.

[d] We assume that it will take 16 hours for each respondent to familiarize with regulatory requirements.

[e] Initial performance testing was assumed to take 280 technical hours (1 test leader for two weeks and 5 feet crew for one week), with an additional 40 hours for the establishment of parameter monitoring levels for a total of 320 respondent hours per occurrence.

[f] We assume that 5 percent of the initial tests will be repeated during each successive year.

[g] We assume that it will take each respondent 40 hours two times per year to complete reports (semiannual reporting).

[h] Includes burden from activities based on amendments in the October 15, 2018 final rule (83 FR 51842). These activities only apply to owners and operators of storage vessels that are subject to these provisions (15 facilities), or continuous process vents (1 facility).

[i] We assume that it will take 4 hours two times per year to gather monitoring information and maintain monitoring equipment.

[j] Totals have been rounded to three significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic Resins (40 CFR Part 63, Subpart OOO) (Renewal)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) EPA Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year [a]	(E) Technical Hours Per Year (E=CXD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Costs, $ [b]
Initial performance test	N/A							
Repeat performance test [c]	20	1	20	1	20	1	2	$1,280.11
Report review								
a) Notification of construction/reconstruction	N/A							
b) Notification of anticipated startup	N/A							
c) Notification of actual startup	N/A							
d) Notification of modification	N/A							
e) Notification of compliance status	N/A							
f) Notification of performance test/review test report [d]	4	1	4	1	4	0.2	0.4	$256.02
g) Notification of process change	N/A							
h) Notification of inspection of storage vessel	N/A							
i) Notification of change in primary product	N/A							
j) Pre-compliance report	N/A							
k) Storage vessel initial compliance demonstration	N/A							
l) Periodic reports of compliance status [e]	4	2	8	19	152	7.6	15.2	$9,728.85
m) Semiannual summary report	2	2	4	19	76	3.8	7.6	$4,864.43
n) Reports of malfunctions	2	2	4	19	76	3.8	7.6	$4,864.43
TOTAL (rounded) [f]					**377**			**$21,000**

Assumptions:

[a] This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject over the next three years

[b] 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.

[c] We assume that it would take 20 hours once per year for the Agency to view the repeat performance test.

[d] We assume that it will take 4 hours once per year for the Agency to review the notification of performance test and the performance test report.

[e] We assume that it will take 4 hours twice per year for Agency to review the periodic report of compliance status.

[f] Totals have been rounded to three significant figures. Figures may not add exactly due to rounding.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A)	(B)	(C)	(D)	(E)
	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	Number of Respondents (E=A+B+C-D)
1	0	19	0	0	19
2	0	19	0	0	19
3	0	19	0	0	19
Average	0	19	0	0	19

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

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 and performance tests	0	1	0	0
Repeat performance test [a]	1	1	0	1
Malfunction reports	19	2	0	38
Semiannual compliance reports	19	2	0	38
Other reports	19	2	0	38
			Total	115

[a] We assume that 5 percent of the initial tests will be repeated during each successive year.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent [c]	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent [c]	Number of Respondents with O&M	Total O&M (E X F)
pH Monitor	$1,382	0	$0	$415	19	$7,878
Liquid Flow Monitor	$691	0	$0	$138	19	$2,626
O&M	$0	0	$0	$2,080	19	$39,520
Continuous process vent control systems [a]	$3,330,054	0	$0	$1,459,239	2	$2,918,479
Monitoring equipment	$30,293	0	$0	$4,313	19	$81,954
Total [b]			**$0**			**$3,050,000**

[a] We assume that there are 19 facilities in the Amino/Phenolic Resins category, however only 6 facilities are expected to operate emissions controls for continuous process vents. Further, 4 out of 6 back-end process vents are able to comply with the standard without any additional controls. The EPA currently anticipates that 2 back-end CPVs located at 1 facility installed an RTO. Capital/Startup and Annual O&M Costs are average facility costs based on revised control technology vendor information from industry provided to the EPA as part of the October 15, 2018 final rule. We assumed that facilities are in compliance with the 2018 final rule amendments by October 15, 2019, and therefore there are no capital costs under this ICR renewal. For front-end CPVs at existing affected sources, it is expected that these CPVs are able to meet the standard without any additional controls. See the memorandum "National Impacts Associated with Final Standards for CPVs and Storage Tanks in the Amino and Phenolic Resins Production Source Category" in Docket Id. No. EPA-HQ-OAR-2012-0133-0105 for additional information.

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

[c] This ICR updates the capital and O&M costs from 2014 dollars (CEPCI CE Index 576.1) to 2024 dollars (CEPCI CE Index 796.2).