

ICR Summary Information

Hours per Response	203
Number of Respondents	19
Total Estimated Burden Hours	23,300
Total Estimated Costs	\$6,240,000
Annualized Capital O&M	\$3,050,000
Total Annual Responses	115
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for the Manufacture of Amino/Phenolic

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
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with regulatory requirements ^{c, d}	16	1	16	19
B. Plan activities	8	1	8	19
C. Training	16	1	16	19
D. Create, test and research development ^{e, f}	320	1	320	1
E. Gather, monitor and inspect information	208	1	208	19
F. Process, compile and review	48	2	96	19
G. Write Report				
1) Pre-compliance report	20	1	20	0
2) Notification of compliance status	20	1	20	0
3) Semiannual summary report ^g	40	2	80	19
4) Activities for periodic report related to storage vessel maintenance ^h	1	1	1	15
5) Reports of malfunctions	20	2	40	19
6) Other reports	8	2	16	19
7) Leak detection and repair (LDAR) reporting	60	1	60	19
Subtotal for Reporting Requirements				
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
2a) Monitoring records	24	2	48	19
2b) Continuous process vent records ^h	4	2	8	1
3) Batch process vent records	24	2	48	19
4) Aggregate batch vent stream records	24	2	48	19
5) Leak detection and repair (LDAR) records	24	2	48	19
6) Other records and documentation	24	2	48	19
D. Develop record system				
1) Record/disclose information	16	2	32	19
2) Store, file, maintain information ⁱ	4	2	8	19
E. Time to enter information				
1) Malfunction records	4	2	8	19
2) Monitoring records	4	2	8	19
3a) Storage vessel - maintenance & recording info ^h	1	1	1	15
3b) Continuous process vent records ^h	4	2	8	1
4) Batch process vent records	4	2	8	19
5) Aggregate batch vent stream records	4	2	8	19

6) Leak detection and repair (LDAR) records	4	2	8	19
7) Other records and documentation	8	2	16	19
F. Time to train personnel				
1) Control equipment inspect and monitor	40	2	80	19
2) Leak detection and repair	40	2	80	19
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^j				
Total Capital and O&M Cost (rounded) ^j				
Grand Total (rounded) ^j				

Assumptions:

^a This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject over the

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10 + 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$109.09 (\$52.00 + 110%). These rates are based on the Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." These rates are increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employer expenses associated with hiring, training, and equipping their employees. This ICR assumes that Managerial hours are 5 percent of total 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 field crew for one week) and 320 monitoring levels for a total of 600 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 include 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.

Resins (40 CFR Part 63, Subpart OOO) (Renewal)

(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
304	15	30	\$47,881.98
152	8	15	\$23,940.99
304	15	30	\$47,881.98
320	16	32	\$50,402.08
3,952	198	395	\$622,465.69
1,824	91	182	\$287,291.86
0	0	0	\$0
0	0	0	\$0
1,520	76	152	\$239,409.88
15	1	2	\$2,362.60
760	38	76	\$119,704.94
304	15	30	\$47,881.98
1,140	57	114	\$179,557.41
12,184			\$1,668,781
228	11	23	\$35,911.48
912	46	91	\$143,645.93
8	0.4	1	\$1,260.05
912	46	91	\$143,645.93
912	46	91	\$143,645.93
912	46	91	\$143,645.93
912	46	91	\$143,645.93
608	30	61	\$95,763.95
152	8	15	\$23,940.99
152	8	15	\$23,940.99
152	8	15	\$23,940.99
15	1	2	\$2,362.60
8	0.4	1	\$1,260.05
152	8	15	\$23,940.99
152	8	15	\$23,940.99

Labor Rates	
Management	\$172.41
Technical	\$141.75
Clerical	\$71.36

152	8	15	\$23,940.99
304	15	30	\$47,881.98
1,520	76	152	\$239,409.88
1,520	76	152	\$239,409.88
11,135			\$1,525,135
23,300			\$3,190,000
			\$3,050,000
			\$6,240,000

203 hrs/response

e next three years.

ical \$71.36 (\$33.98 + 110%). These rates are from the United States
up.” The rates are from column 1, “Total compensation.” The rates
ig workers beyond their wages and benefits, including business
it of Technical hours, and Clerical hours are 10 percent of Technical

k), with an additional 40 hours for the establishment of parameter

apply to owners and operators of storage vessels that are subject to

**Table 2: Average Annual EPA Burden and Cost – NESHAP for the Manufacture of Amin
OOO) (Renewal)**

Burden Item	(A)	(B)	(C)	(D)
	EPA Hours per Occurrence	Number of Occurrences Per Respondent Per Year	EPA Hours Per Respondent Per Year (C=AxB)	Number of Respondents Per Year ^a
Initial performance test	N/A			
Repeat performance test ^c	20	1	20	1
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
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
m) Semiannual summary report	2	2	4	19
n) Reports of malfunctions	2	2	4	19
TOTAL (rounded) ^f				

Assumptions:

^a This ICR assumes there are 19 respondents subject to the rule and that no additional respondents will become subject to the rule.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%) Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes 15 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 a

^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.

io/Phenolic Resins (40 CFR Part 63, Subpart

(E)	(F)	(G)	(H)
Technical Hours Per Year (E=CXD)	Management Hours Per Year (F=Ex0.05)	Clerical Hours Per Year (G=Ex0.1)	Total Costs, \$ b
20	1	2	\$1,280.11
4	0.2	0.4	\$256.02
152	7.6	15.2	\$9,728.85
76	3.8	7.6	\$4,864.43
76	3.8	7.6	\$4,864.43
377			\$21,000

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

bject over the next three years

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

nd the performance test report.

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Capital/Startup vs. Operation and Maintenance (O&M)			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent ^c	Number of New Respondents	Total Capital/Startup Cost, (B X C)
pH Monitor	\$1,382	0	\$0
Liquid Flow Monitor	\$691	0	\$0
O&M	\$0	0	\$0
Continuous process vent control systems ^a	\$3,330,054	0	\$0
Monitoring equipment	\$30,293	0	\$0
Total ^b			\$0

^a We assume that there are 19 facilities in the Amino/Phenolic Resins category, however only 6 facilities are expected to have process vents. Further, 4 out of 6 back-end process vents are able to comply with the standard without any additional controls. The back-end CPVs located at 1 facility installed an RTO. Capital/Startup and Annual O&M Costs are average facility information from industry provided to the EPA as part of the October 15, 2018 final rule. We assumed that facilities will complete amendments by October 15, 2019, and therefore there are no capital costs under this ICR renewal. For front-end process vents, these CPVs are able to meet the standard without any additional controls. See the memorandum “National Impact of Storage Tanks in the Amino and Phenolic Resins Production Source Category” in Docket Id. No. EPA-HQ-OAI-2018-0686.

^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 685.1).

M) Costs		
(E)	(F)	(G)
Annual O&M Costs for One Respondent ^c	Number of Respondents with O&M	Total O&M (E X F)
\$415	19	\$7,878
\$138	19	\$2,626
\$2,080	19	\$39,520
\$1,459,239	2	\$2,918,479
\$4,313	19	\$81,954
		\$3,050,000

pected to operate emissions controls for continuous
ional controls. The EPA currently anticipates that 2
ity costs based on revised control technology vendor
ities are in compliance with the 2018 final rule
| CPVs at existing affected sources, it is expected that
cts Associated with Final Standards for CPVs and
3-2012-0133-0105 for additional information.

CEPCI 2014 CE
INDEX 576.1
CEPCI 2024 CE
INDEX 796.2
CEPCI Ratio 1.3820517

CI CE Index 796.2).

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 $E=(B \times C)+D$
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.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	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.