U.S. Environmental Protection Agency
Information Collection Request

Title: National Emission Standards for Hazardous Air Pollutants: Polyvinyl Chloride and Copolymer Production Reconsideration; New Major Source Process Wastewater Standards (40 CFR Part 63, Subpart HHHHHHH) (Final Rule)

OMB Control Number: 2060-0666

EPA ICR Number: 2432.08

Abstract: The Environmental Protection Agency (EPA) proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Polyvinyl Chloride and Copolymer Production (PVC) source category on December 8, 2000, and promulgated them on July 10, 2002. Subsequently, the Court vacated and remanded those standards back to the EPA. In response, the EPA promulgated new NESHAP requirements April 17, 2012. These regulations apply to process vents, storage vessels, equipment leaks, wastewater systems, heat exchange systems, and stripped resin at affected sources. New major sources include those that either commenced construction or reconstruction after May 20, 2011.

As part of the review of this NESHAP, the EPA is finalizing amendments to the NESHAP for PVC sources that remove the new major source total non-vinyl chloride organic hazardous air pollutant (TOHAP) emission limit; remove the associated testing, monitoring, recordkeeping, and reporting requirements; and establish vinyl chloride as a surrogate for non-vinyl chloride organic HAP in PVC process wastewater. It is no longer necessary to collect the information associated with the TOHAP emission limit to assure compliance with 40 CFR part 63, Subpart HHHHHHH. This information collection request (ICR) documents the cost savings and burden reduction associated with these amendments. The burden from the existing rule requirements is accounted for in EPA ICR number 2432.07.

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 the NESHAP.

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 HAP. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the

maximum degree of emissions 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 PVC facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the EPA promulgated the NESHAP at 40 CFR Part 63, Subpart HHHHHHH.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The EPA also uses the collected information for targeting inspections and as evidence in legal proceedings.

The EPA requires performance tests in order to determine an affected facility's initial capability to comply with these emission standards. Some sources use continuous emission monitors to ensure compliance with these same standards at all times. A source may use a record of the operating parameters of the performance test under which compliance was achieved to determine compliance in lieu of a continuous emission monitor.

The EPA uses the notifications in the standards 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 source installed and is operating the pollution control devices properly, if the source is detecting and repairing leaks, and that the source is achieving compliance with the standards. The EPA may also observe the performance test.

The EPA uses the semiannual reports 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 final amendments do not include any new electronic reporting requirements. The rule was previously amended to include electronic reporting provisions on April 17, 2012. The EPA requires respondents to use the Agency'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 PRA requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. The EPA requires respondents to submit electronic copies of certain notifications through EPA's CEDRI. The notifications are an upload of the currently required notification in portable document format (PDF) file. For purposes of this ICR, the EPA assumes that there is no 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.

Respondents may also maintain electronic copies of records in order to satisfy federal recordkeeping requirements. For additional information on the PRA 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 the EPA requires respondents to submit 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 EPA has not delegated the subject standards, 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.

There are no small entities affected by this final rule.

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.

The final amendments remove the testing, monitoring, recordkeeping, and reporting requirements for TOHAP from process wastewater at new major sources. This reduction in monitoring and recordkeeping will not affect new major sources' ability to meet the final standards.

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. This revision to the collection does not add recordkeeping or reporting requirements but removes existing reporting requirements and relieves the information collection burden.

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.

The EPA provided a public notice and solicitation of public comment on this collection in the *Federal Register* notice of the proposed rulemaking published for 40 CFR Part 63, Subpart HHHHHHH (85 FR 71490; November 9, 2020). The EPA did not receive any comments specifically related to this ICR. A summary of the comments on the proposed surrogacy and removal of the non-vinyl chloride organic HAP emission limit and the EPA's response is available in the preamble for this final action.

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 EPA provided a public notice and solicitation of public comment on this collection in the Federal Register notice of the proposed rulemaking published for 40 CFR part 63, subpart HHHHHHH (85 FR 71490; November 9, 2020). See discussion in Section 8A above.

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.

As these standards remove certain monitoring and recordkeeping requirements, no respondents will submit confidential information to the EPA as a result of the final amendments. However, generally, the EPA will safeguard any information submitted to the Agency for which a claim of confidentiality is made 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.

As these final standards remove certain monitoring and recordkeeping requirements, they do not include or affect any 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 PVC manufacturers. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 2821, which corresponds to the North American Industry Classification System (NAICS) 325211 for polyvinyl chloride resins manufacturing.

The "Affected Public" consist of new private-sector major sources involved in the polymerization of vinyl chloride monomer to produce PVC resins. None of the facilities in the United States are owned by either state, local, Tribal, or Federal entities.

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).

This action only affects new major source PVC manufacturers. As such, this action will not affect any existing source respondents. The EPA estimates that no new major source facilities will become subject to the rule in the next three years. Therefore, the EPA estimates that this ICR will impact zero respondents as shown in the tables titled "Number of Respondents" and "Total Annual Responses" at the end of this document.

12b. Information Requested

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 performance test with test plan	§63.9(e)
Notification of compliance status	§63.11985(a)
Initial notification and 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	
Compliance report	§63.11985(b)
Batch precompliance report	§63.11985(c)(2)
Pressure relief device deviation report	§63.11985(c)(7)

Reports	
Performance test reports (electronic submission)	§63.11985(c)(9)

A source must keep the following records:

Recordkeeping	
A copy of each notification and report submitted to comply with this subpart	63.11990(a)
Records of storage vessels	§63.11990(b)
Records of equipment leaks	§63.11990(c)
Records of heat exchange systems	§63.11990(d)
Records of process vents	§63.11990(e)-(f)
Records of closed vent systems	§63.11930(g) and §63.11990(g)
Records of resin strippers	§63.11990(h)
Records of process wastewater	§63.11990(i)
Records of other emissions	§63.11990(j)
Keep records for five years	§63.11995(a)

12c. Respondent Activities

There are no respondent activities associated with the final revisions to this information collection. This revision to the collection removes existing data reporting requirements for TOHAP emissions from PVC process wastewater and any required respondent activities.

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 PRA. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The EPA estimates that there will be no burden to industry over the next three years from these amendments as no new sources are anticipated to become operational and existing sources will not be affected.

This ICR uses the following labor rates:

Managerial	$174.03 ($82.87 + 110%)
Technical	$114.66 ($54.60 + 110%)
Clerical	$51.95 ($24.74 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2025, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 - Chemical Manufacturing. 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 potential cost savings associated with removing the TOHAP monitoring and recordkeeping requirements for new major sources.

As there will be no respondents affected by this ICR, the total capital and operation and maintenance (O&M) costs associated with these amendments are $0 per year. This is the total of column G shown at the end of this document in the table Capital/Startup and O&M Costs.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

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-AIR.

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. The EPA uses performance test reports 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-AIR 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 EPA estimates there will be approximately $1,310 in Agency costs due to states and EPA regions familiarizing themselves with the amendments. This is a one-time cost and will not be repeated over the course of the three years of this ICR.

The average hourly labor rates are as follows:

Managerial	$79.01 (GS-13, Step 5, $49.38 + 60%)
Technical	$58.62 (GS-12, Step 1, $36.64 + 60%)
Clerical	$31.73 (GS-6, Step 3, $19.83 + 60%)

These rates are from the Office of Personnel Management (OPM) 2026 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.

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 will be no immediate reductions as the EPA is unaware of any new major source becoming operational in the next three years.

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 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 Polyvinyl Chloride and Copolymers Production (40 CFR Part 63, Subpart HHHHHHH) (Final Rule)

Burden Item	(A) Respondent Hours per Occurrence (Technical Hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C = A x B)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (E = C x D)	(F) Management Hours per Year (F = E x 0.05)	(G) Clerical Hours per Year (G = E x 0.1)	(H) Total Labor Costs per Year [b]
1. Applications	not applicable							
2. Surveys and Studies	not applicable							
3. Reporting Requirements								
A. Familiarization with Regulatory Requirements [c,d]	16	1	5	0	0	0	0	$0
B. Required Activities								
1) Periodic Performance Test, Sampling, and Report								
a) Stripped Wastewater: TOHAP [e]	-10	12	-117	0	0	0	0	$0
b) Uncontrolled Wastewater: TOHAP [e]	-24	1	-24	0	0	0	0	$0
C. Create Information	Incl. in 3.B							
D. Gather Information	Incl. in 3.E							
E. Report Preparation	not applicable [g]							
Subtotal for Reporting Requirements						***0***		***$0***
4. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	Incl. in 3.A							
B. Implement Activities	not applicable							
C. Develop Record System	not applicable							
D. Record Information								
1) Records of TOHAP Wastewater Requirements	-15	1	-15	0	0	0	0	$0
E. Personnel Training	Incl. in 3.B							

F. Time for Audits	not applicable							
Subtotal for Recordkeeping Requirements					***0***			***$0***
TOTAL LABOR BURDEN AND COSTS (rounded) [f]					**0**			**$0**
TOTAL CAPITAL AND O&M COST (rounded) [f]								**$0**
GRAND TOTAL (rounded) [f]								**$0**

Labor hours and costs shown as negative to reflect savings from no longer performing TOHAP wastewater testing.

[a] Assumes that, over the next three years, no existing respondents will be affected by this ICR and no new respondents will become subject to the ICR.

[b] Labor rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2025, National Industry-Specific Occupational Employment and Wage Estimates for NAICS 325000 - Chemical Manufacturing. 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.

[c] One-time only costs.

[d] It will take 8 employees 2 hours per person to read and understand the rule requirements.

[e] TOHAP Wastewater testing is estimated to take 4 hours per sample for 2 samples per facility. Based on the available data, there are 17 wastewater streams for 14 existing major sources that are sampled monthly. There are 3 uncontrolled wastewater streams per source that are sampled annually. See Capital/O&M costs for TOHAP samples.

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

[g] While the final rule revisions impact certain reporting requirements, it is assumed that the overall burden associated with reporting will not decrease as the changes do not adjust the number or frequency of the reports, just the amount of information contained within the report.

Table 2 – Annual EPA burden and Cost (40 CFR Part 63, Subpart HHHHHHH)

Burden Item	(A) EPA Person-Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Person-Hours per Plant Per Year (C = A x B)	(D) Plants Per Year	(E) Technical Person-Hours per Year (E = C x D)	(F) Management Person-Hours Per Year (F = E x 0.05)	(G) Clerical Person-Hours per Year (G = E x 0.1)	(H) EPA Total Cost per Year [b]
1. Applications	not applicable							
2. Familiarization with Rule Requirements [a]	2	1	2	10	20	1	2	$1,306
3. Required Activities								
A. Observe initial performance tests	48	1	48	0	0	0	0	$0
B. Excess emissions -- Enforcement Activities	24	1	24	0	0	0	0	$0.00
C. Create Information	not applicable							
D. Gather Information	not applicable							
E. Report Reviews	not applicable [c]							
F. Prepare annual summary report [d]	24	1	24	0	0	0	0	$0.00
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * $75 per diem) + ($600 per round trip)				N/A	per trip			$0
TOTAL [c]					**23**			**$1,310**

[a] While there are no industry respondents, it is assumed that states and EPA regions will still review the rule to understand the changes. Assumed 2 hours per state and per region (6 states, 4 EPA regions – 10 entities).

[b] Labor rates are $79.01 for managerial (GS-13, Step 5, $49.38 + 60%), $58.62 for technical (GS-12, Step 1, $36.64 + 60%), and $31.73 for clerical (GS-6, Step 3, $19.83 + 60%). These rates from the Office of Personnel Management (OPM), 2026 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] While the final rule revisions impact certain reporting requirements, it is assumed that the overall burden associated with reporting will not decreases as the changes do not adjust the number or frequency of the reports, just the amount of information contained within the report.

[d] Using four hours per state (6 states) to write annual summary report.

[e] Totals have been rounded to 3 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) Number of New Respondents [1]	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	14	0	0	14
2	0	14	0	0	14
3	0	14	0	0	14
Average	0	14	0	0	14

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses (Over 3-Yr Period) E=(BxC)+D
Initial notification	0	0	0	0
Batch pre-compliance report	0	0	0	0
Notification of performance test with test plan	0	0	0	0
Notification of compliance status	0	0	0	0
Semiannual compliance report	0	0	0	0
Notice of inspection	0	0	0	0
TOTAL				**0**

Capital/Startup and O&M Costs						
(A) Source & Monitor Type	(B) Capital/Startup Costs for One Respondent	(C) Number of Respondents with Capital/Startup Costs	(D) Total Capital/ Startup Cost (D = B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M Costs (G = E x F)
Stripped Wastewater: TOHAP Testing [a]	$820	0	$0	-$9,840	0	$0
Uncontrolled Wastewater: TOHAP Testing [b]	$2,091	0	$0	-$1,693	0	$0
TOTAL (rounded)			**$0**			**$0**

O&M costs shown as negative to reflect savings from no longer performing TOHAP wastewater testing.

[a] Average costs for TOHAP testing is approximately $820 per major source, and 1 test per major source per month.

[b] TOHAP testing on uncontrolled streams is performed annually. There are an average of 3 uncontrolled streams per facility.