114.66 174.03 51.95 **Labor rates based on May 2025 data from the Bureuf of Labor Statis**

Annual Respondent Burden and Cost (40 CFR Part 63 Subpart HHHHHHH)

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	16	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**

2026: 58.62 79.01 31.73

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)
1. Applications	not applicable						
2. Familiarization with Rule Requirements [a]	2	1	2	10	20	1	2
3. Required Activities							
A. Observe initial performance tests	48	1	48	0	0	0	0
B. Excess emissions -- Enforcement Activities	24	1	24	0	0	0	0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews	not applicable [c]						
F. Prepare annual summary report [d]	32	1	32	0	0	0	0
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * $75 per diem) + ($600 per round trip) =						n/a	per trip
TOTAL ANNUAL BURDEN AND COST (rounded) [e]					**23**		

ATTACHMENT E: RECORDKEEPING AND REPORTING COST ALGORITHM
February 9, 2012

Record Keeping and Reporting Burden by Emission Point

Note: This table is used to caluclate the record keeping and reporting burden by emission point for the PVC NESHAP. The costs presented in the table below represent costs not otherwise included in the PVC NESHAP Impact estimate (i.e., testing and monitoring costs are already included in the PVC NESHAP impacts estimate, therefore, they are not included in the table below). The costs presented in the table below should be added to the previously calculated PVC Impacts to obtain an impacts estimate which includes record keeping and reporting.

Record Keeping and Reporting Burden By Emission Point						
Emission Point	Initial Cost ($)	Initial Notes	Annual Cost ($/yr)			Annual Notes
			Yr 1	Yr 2	Yr 3	
Resins	#REF!	a,b,d	#REF!	#REF!	#NAME?	e,f,g
Process Vents	#REF!	a,b,c,d	#REF!	#REF!	#NAME?	e,f,g
Wastewater	#REF!	a,b,d	#REF!	#REF!	#NAME?	e,f,g
Equipment Leaks	#REF!	a,b,d	#REF!	#REF!	#NAME?	e,f,g,h
Storage Vessels	#REF!	a,d	#REF!	#REF!	#NAME?	e,f,g
Heat Exchange Systems	#REF!	a,b,d	#REF!	#REF!	#NAME?	e,f,g
Other Sources	#REF!	a,d	#REF!	#REF!	#NAME?	e,f,g
Total	**#REF!**		**#REF!**	**#REF!**	**#NAME?**	

a Labor/Non Labor Costs to "Read/Understand Rule Requirements" divided by 7 emission points
b Initial Performance Test/Sampling/Report
c Establishment of operating parameters and monitoring plan
d Report preparation for item 3.E.1-6 divided by 7 emission points
e Periodic sampling/testing/and monitoring (not applicable for process vents in year 1)
f Years 2 and 3 include items 3.E.5 and 3.E.6 divided by 7 emission points
g In year 2 and 3, recordkeeping items under 4.D are included
h includes annual labor cost for PRD monitoring system

Equipment Leaks BTF Costs Calculation on a Facility Basis

Equipment Leaks	#REF!	#REF!	#REF!	#NAME?	Facilities going from V to UU
Equipment Leaks	#REF!	#REF!	#REF!	#NAME?	MACT
Equipment Leaks	#REF!	#REF!	#REF!	#NAME?	Incremental BTF Costs for Facilities going from V to UU

2. Required activities			
a. Perf. spec. tests (certif.) for CMS	11	1	11

Notes:
2. Person-hours per occurrence for CMS performance specification costs are based on the performance specification costs to certify CMS ($700) divided by the composite hourly labor rate ($66.41/hr).

Sources:
1. Bureau of Labor Statistics, Occupational Employment Statistics, May 2008 National Industry-Specific Occupational Employment and Wage Estimates.
2. Hospital/Medical/Infectious Waste Incinerators (HMIWI) [EPA-HQ-OAR2006-0534] Testing and Monitoring Options and Costs Memo (IV-B-66).

Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup/O&M Item	(A) Capital/Startup Cost for One Respondent	(B) Number of New Respondents	(C) Total Capital/Startup Cost (C = A x B)	(D) Annual O&M Costs for One Respondent
Stripped Wastewater: TOHAP Testing [1]	$820	0	$0	-$9,840
Uncontrolled Wastewater: TOHAP Testing [2]	$2,091	0	$0	-$2,091
Total			**$0**	

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
O&M costs shown as negative to reflect savings from no longer performing TOHAP wastewater testing.

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

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

(E) Number of Respondents with O&M	(F) Total O&M (F = D x E)
0	$0
0	$0
	$0