

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), EPA ICR Number 1871.05, OMB Control Number 2060-0420

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Generic Maximum Achievable Control Technology (hereafter, this subpart is referred to as the "Generic MACT") were proposed on October 14, 1998 (63 FR 55178) and promulgated on June 29, 1999 (64 FR 34854). These regulations apply to hazardous air pollutant (HAP) emission sources in four categories including: Polycarbonates (PC) Production, Acrylic and Modacrylic Fibers (AMF) Production, Acetal Resins (AR) Production and Hydrogen Fluoride (HF) Production. This Information Collection Request (ICR) addresses these four source categories. On November 2, 2001, the Agency promulgated wastewater provisions amendments to the Generic MACT applicable to wastewater streams for the PC, AMF, and AR production source categories. The HF production source category does not have wastewater streams. On June 7, 2002, the Agency made additional amendments as a direct ruling to the Generic MACT to clarify definitions and the recordkeeping provisions related to how readily accessible records should be maintained. This information is being collected to assure compliance with the provisions of 40 CFR part 63, subpart YY.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators 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. The specific monitoring and recordkeeping requirements vary for each source category depending on the types of emissions control equipment and monitoring equipment used to comply with the Generic MACT standards for their category. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

Any owner or operator subject to the provisions of this subpart will 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. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly

to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

There are, approximately, 10 respondents in four categories that are currently subject to the regulation and they are: 1) Polycarbonates (PC) Production - four sources; 2) Acrylic and Modacrylic Fibers (AMF) Production - three sources; 3) Acetal Resins (AR) Production - two sources; and 4) Hydrogen Fluoride (HF) Production - one source. It is estimated that no additional respondents per year will become subject to the regulation in the next three years.

2. Need for and Use of the Collection

2(a) Need/Authority for 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 PC, AMF, AR and HF source categories 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 YY.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure 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 standard. Continuous emission monitors are used to ensure compliance with the standard 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 the standard are used 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may be observed as well.

The required semiannual reports are used to determine periods of excess emissions, to identify problems at the facility, to verify operation/maintenance procedures, and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart YY.

3(a) Non-duplication

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 similar 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, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, we referenced the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the United States Census Bureau, the Air Facility System

(AFS), and websites covering PC, AMF, AR and HF source categories. We also consulted with the EPA's Office of Air Quality Planning and Standards, Information Transfer, the Program Integration Division, and one EPA regional office.

After reviewing our internal data sources and industry experts, we have determined that additional consultations with industry are inappropriate for this ICR renewal.

The standard was developed with the participation and/or consultation with industry representatives. The Agency has performed additional reviews to determine additional burden reduction opportunities. The Agency currently collects the minimum amount of information necessary to ensure compliance with the standard.

3(d) Effects of Less Frequent Collection

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance decreases.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the standards. 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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for the purpose of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. If records were retained for less than five years, EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records.

3(f) Confidentiality

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 (CBI) (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).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents NAICS and SIC Codes

The respondents to the recordkeeping and reporting requirements are HAP emissions in four categories: Polycarbonates (PC) Production, Acrylic and Modacrylic Fibers (AMF) Production, Acetal Resins (AR) Production and Hydrogen Fluoride (HF) Production. The Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for source category description.

Standard (40 CFR part 61, subpart N)	SIC Codes	NAICS Codes
Polycarbonates (PC) Production (Synthetic Rubber Manufacturing)	2822	325212
Acrylic and Modacrylic Fibers (AMF) Production (Manmade Organic Fibers, Except Cellulosic)	2824	325222
Acetal Resins (AR) Production (Plastic Materials, Synthetic and Resins, and Nonvulcanizable Elastomers)	2821	325211
Hydrogen Fluoride (HF) Production (Industrial Inorganic Chemicals, Not Elsewhere Classified)	2819	325188

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NESHAP for Source Categories: Generic Maximum Achievable Control Technology (40 CFR part 63, subpart YY) (Renewal).

A source must make the following reports:

Notification Reports	Standard Citation by Section
Application for approval of construction/reconstruction	63.5(d), 63.1110(a)
Notification of initial startup	63.1110(b)
Notification of initial applicability	63.09(b), 63.1110(a), and 63.1110(c)
Notification of compliance status	63.9(h), 63.1110(a), and 63.1110(d)
Notification of performance test and performance evaluation results	63.7(b), 63.9(e), 63.10(d)(2), 63.1110(d), and 63.1110(a)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Physical or operational change	63.8(a)
Opacity or visible emissions	63.10(d)(3)
Develop startup, shutdown, malfunction plan and periodic reports	63.10(d)(5)(i), 63.1110(b), and 63.1111
Excess emissions and continuous parameter monitoring systems (CPMS) performance reports	63.1110(a)

Reports	
Periodic reports (Semiannual or according to the schedule for Title V) with information on excess emissions and on the implementation of leak detection and repair standard provisions	63.1110(e), 63.1108(a), and 63.1109
Startup, shutdown and malfunction reports	63.1110(a), and 63.1111(b)

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, malfunctions periods when	63.10(b)(2) and

Recordkeeping	
excess emissions have occurred during the reporting period	63.1109(a)
Maintain records of performance test and performance evaluation results	63.1109(a)
Maintain records of all reports and notifications	63.10(b) and 63.1109(a)
Maintain record of applicability	63.10(b)(3) and 63.1109(d)
Maintain records of initial and compliance status notifications	63.9(h), 63.1109(d)
Records of CPMS operation adjustments, calibration checks, and maintenance	63.10(b)(2)(vii) and 63.1109(a)
Records of implementation of leak detection and repair (LDAR) standards provision	63.1107
Records are required to be retained for five years	63.10(b)(2)

Electronic Reporting

Currently, respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Conduct control device performance tests.
Conduct a performance evaluation of the CPMS.
Inspect and monitor closed-vent system.

Respondent Activities
Monitor control devices.
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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
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 Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might 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. 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 entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA headquarters and EPA regional offices. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

All of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 requirements the minimum 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. According to the Paperwork Reduction Act Submission for the NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards¹, this ICR does not have a significant impact on small entities. The Agency assumes that zero percent of the 10 facilities affected by this ICR, or zero facilities, are small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), attached.

6. Estimating the Burden and Cost of the Collection

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

¹ Paperwork Reduction Act Submission for the NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards, U.S. EPA, June 1999.

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 Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 4,004 (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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry cost associated with the information collection activities in the subject standard 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 the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous	(B) Capital/	(C) Number of	(D) Total Capital/	(E) Annual O&M	(F) Number of	(G) Total O&M,

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Monitoring Device	Startup Cost for One Respondent	New Respondents	Startup Cost, (B X C)	Costs for One Respondent ¹	Respondents with O&M	(E X F)
PC (use of non-contractor)	\$0	0	\$0	\$144.55	2	\$289.10
PC (use of contractor) ²	\$0	0	\$0	\$53,128.85	2	\$106,257.70
AMF	\$0	0	\$0	\$144.55	3	\$433.65
AR	\$0	0	\$0	\$144.55	2	\$289.10
HF	\$0	0	\$0	\$144.55	1	\$144.55
Total			\$0			\$107,414.10
Total rounded						\$107,414.00

¹ We have assumed that each source will respond 5 times per year to comply with the rule at a total cost of \$144.55 per source to cover O&M costs. This estimate is based on the assumption that it takes 0.5 hours to conduct these tasks at a clerical labor rate of \$42.55 per hour for a total labor cost of \$21.28 per response. First-class postage is estimated at \$7.63 per response. Thus, the total storage, filing, photocopying, and postage cost per response is \$28.91.

² Based on information we obtained, we have determined that two PC sources out of a total of four sources will use contractor support for CPMS O&M, at a total cost of approximately \$53,000 per source.

The total capital/startup costs for this ICR are zero.

The total operation and maintenance (O&M) costs for this ICR are \$107,414.

The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$107,414.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 cost during the three years of the ICR is estimated to be \$2,797, for 69 hours.

This cost is based on the average hourly labor rate as follows:

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) A2005 General Schedule@ which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden - NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), attached.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 10 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is 10 per year (see table below).

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

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	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 10.

The total number of annual responses per year is calculated using the following table:

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 E=(BxC)+D
Initial requirements for PC Production	0	1	N/A	0
Initial requirements for AMF Production	0	1	N/A	0
Initial requirements for AR Production	0	1	N/A	0
Initial requirements for HF Production	0	1	N/A	0
SSM reports for PC Production	4	1	N/A	4
SSM reports for AMF Production	3	1	N/A	3
SSM reports for AR Production	2	1	N/A	2
SSM reports for HF Production	1	1	N/A	1
Periodic reports for PC Production	4	2	N/A	8
Periodic reports for AMF Production	3	2	N/A	6
Periodic reports for AR Production	2	2	N/A	4
Periodic reports for HF Production	1	2	N/A	2
LDAR reports for PC Production	0	2	N/A	0
LDAR reports for AMF Production	0	2	N/A	0
LDAR reports for AR Production	0	2	N/A	0
LDAR reports for HF Production	0	2	N/A	0
			Total	30

The number of Total Annual Responses is 30.

The total annual labor costs are \$331,146 for 4,004 hours. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), attached.

6(e) Bottom Line Burden Hours and Cost Tables

Details of the bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$331,146. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information are estimated to average 133 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$107,414. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over the next three years is estimated to be 69 labor hours at a cost of \$2,797. See Table 2: Annual Agency Burden and Cost, NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal), attached.

6(f) Reasons for Change in Burden

The annual non-labor cost burden was increased by \$414 due to an omission in the previous ICR renewal.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 133 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; complete and review the collection of information; and to transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under

Docket ID Number EPA-HQ-OECA-2008-0428. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0428 and OMB Control Number 2060-0420 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
PC Production	52	1	52	0	0	0	0	\$0
AMF Production	52	1	52	0	0	0	0	\$0
AR Production	52	1	52	0	0	0	0	\$0
HF Production	52	1	52	0	0	0	0	\$0
ii Startup, Shutdown malfunction reports ^d								
PC Production	2	1	2	4	8	0.4	0.8	\$742.70
AMF Production	2	1	2	3	6	0.3	0.6	\$557.03
AR Production	2	1	2	2	4	0.2	0.4	\$371.35
HF Production	2	1	2	1	2	0.1	0.2	\$185.68
iii Periodic reports ^e								
PC Production	8	2	16	4	64	3.2	6.4	\$5,941.63
AMF Production	8	2	16	3	48	2.4	4.8	\$4,456.22
AR Production	8	2	16	2	32	1.6	3.2	\$2,970.82
HF Production	8	2	16	1	16	0.8	1.6	\$1,485.41
iv Leak detection and repair (LDAR) reports ^{c,f}								
PC Production	8	2	16	0	0	0	0	\$0
AMF Production	8	2	16	0	0	0	0	\$0

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 person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
AR Production	8	2	16	0	0	0	0	\$0
HF Production	8	2	18	0	0	0	0	\$0
4. Recordkeeping Requirements ^a								
A. Read Instructions for ^c	4	1	4	0	0	0	0	\$0
PC Production	4	1	4	0	0	0	0	\$0
AMF Production	4	1	4	0	0	0	0	\$0
AR Production	4	1	4	0	0	0	0	\$0
HF Production	4	1	4	0	0	0	0	\$0
B. Plan Activities for ^c	40	1	40	0	0	0	0	\$0
PC Production	40	1	40	0	0	0	0	\$0
AMF Production	40	1	40	0	0	0	0	\$0
C. Implement Activities ^a								
i Material determinations ^c								
PC Production	N/A							
AMF Production	N/A							
AR Production	40	1	40	0	0	0	0	\$0
HF Production	40	1	40	0	0	0	0	\$0

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
AR Production	N/A							
HF Production	N/A							
ii Control equipment inspection								
a. Tanks								
PC Production	N/A							
AMF Production	2	12	24	3	72	3.6	7.2	\$6,684.34
AR Production	2	12	24	2	48	2.4	4.8	\$4,456.22
HF Production	N/A							
b. Closed-vent system								
PC Production	2	2	4	2	8	0.4	0.8	\$742.70
AMF Production	2	2	4	3	12	0.6	1.2	\$1,094.56
AR Production	2	2	4	2	8	0.4	0.8	\$742.70
HF Production	2	2	4	1	4	0.2	0.4	\$371.35
iii Control equipment leak monitoring								
a. Cover vented to control device								
PC Production	1	2	2	2	4	0.2	0.4	\$371.35
AMF Production	1	2	2	3	6	0.3	0.6	\$547.28
AR Production	1	2	2	2	4	0.2	0.4	\$371.35

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 person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
HF Production	1	2	2	1	2	0.1	0.2	\$185.68
b. Closed-vent system								
PC Production	1	2	2	2	4	0.2	0.4	\$371.35
AMF Production	1	2	2	3	6	0.3	0.6	\$547.28
AR Production	1	2	2	2	4	0.2	0.4	\$371.35
HF Production	1	2	2	1	2	0.1	0.2	\$185.68
iv. Control devices								
a. Initial requirements design analysis, performance ^c								
Test								
PC Production	80	1	80	0	0	0	0	\$0
AMF Production	80	1	80	0	0	0	0	\$0
AR Production	80	1	80	0	0	0	0	\$0
HF Production	80	1	80	0	0	0	0	\$0
b. Operate and maintain CMS								
PC Production	8	12	96	2	192	9.6	19.2	\$17,824.90
AMF Production	8	12	96	3	288	14.4	28.8	\$26,737.34
AR Production	8	12	96	2	192	9.6	19.2	\$17,824.90

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 person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
HF Production v. LDAR Program a. Initial requirement: Identify all effected streams ^c	8	12	96	1	96	4.8	9.6	\$8,912.45
PC Production	20	1	20	0	0	0	0	\$0
AMF Production	20	1	20	0	0	0	0	\$0
AR Production	20	1	20	0	0	0	0	\$0
HF Production	20	1	20	0	0	0	0	\$0
b. Perform monitoring/repairs								
PC Production								
1) In-house ^g	0.1	1,092	192	2	384	19.2	38.4	\$35,649.79
2) Use of contractor support ^h				2				\$8,000.00
AMF Production	16	12	192	3	576	28.8	57.6	\$53,474.69
AR Production	16	12	192	2	384	19.2	38.4	\$35,649.79
HF Production ^g	0.1	1,092	192	1	192	9.6	19.2	\$17,824.90
vi. Container vapor tightness certification								
PC Production	N/A							
AMF Production	N/A							

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
AR Production	N/A							
HF Production	N/A							
D. Develop Record System								
i. Develop startup, shutdown, malfunction plan ^c								
PC Production	20	1	20	0	0	0	0	\$0
AMF Production	20	1	20	0	0	0	0	\$0
AR Production	20	1	20	0	0	0	0	\$0
HF Production	20	1	20	0	0	0	0	\$0
ii. Control equipment ^c								
PC Production	16	1	16	0	0	0	0	\$0
AMF Production	16	1	16	0	0	0	0	\$0
AR Production	16	1	16	0	0	0	0	\$0
HF Production	16	1	16	0	0	0	0	\$0
iii. LDAR Program ^c								
PC Production	40	1	40	0	0	0	0	\$0
AMF Production	40	1	40	0	0	0	0	\$0

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
AR Production	40	1	40	0	0	0	0	\$0
HF Production	40	1	40	0	0	0	0	\$0
E. Record Information (all information required by standard)								
i. Initial requirements: cover design, control device ^c design, and control equipment testing								
PC Production	17	1	17	0	0	0	0	\$0
AMF Production	17	1	17	0	0	0	0	\$0
AR Production	17	1	17	0	0	0	0	\$0
HF Production	17	1	17	0	0	0	0	\$0
ii. Control equipment inspection								
PC Production	1	2	2	2	4	0.2	0.4	\$371.35
AMF Production	1	2	2	3	6	0.3	0.6	\$557.03
AR Production	1	2	2	2	4	0.2	0.4	\$371.35
HF Production	1	2	2	1	2	0.1	0.2	\$185.68
iii. Control equipment monitoring ⁱ								
PC Production	1	52	52	2	104	5.2	10.4	\$9,655.15
AMF Production	1	52	52	3	156	7.8	15.6	\$14,482.73

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
AR Production	1	52	52	2	104	5.2	10.4	\$9,655.15
HF Production	1	52	52	1	52	2.6	5.2	\$4,827.58
iv. Control device CMS								
PC Production	1	12	12	2	24	1.2	2.4	\$2,228.11
AMF Production	1	12	12	3	36	1.8	3.6	\$3,342.17
AR Production	1	12	12	2	24	1.2	2.4	\$2,228.11
HF Production	1	12	12	1	12	0.6	1.2	\$1,114.06
v. LDAR program								
PC Production ⁹	0.02	1,092	21.84	2	43.7	2.19	4.37	\$4,057.51
AMF Production	2	12	24	3	72	3.6	7.2	\$6,684.34
AR Production	2	12	24	2	48	2.4	4.8	\$4,456.22
HF Production ⁹	0.02	1,092	21.84	1	21.8	1.09	2.18	\$2,023.87
F. Time to Train Personnel								
i. Material determination methods								
PC Production	N/A							
AMF Production	N/A							
AR Production	N/A							

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) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
HF Production	N/A							
ii. Control equipment inspection and monitoring ^j								
PC Production	8	1	8	4	32	1.6	3.2	\$2,939.98
AMF Production	8	1	8	3	24	1.2	2.4	\$2,228.11
AR Production	8	1	8	2	16	0.8	1.6	\$1,485.41
HF Production	8	1	8	1	8	0.4	0.8	\$742.70
iii. LDAR program ^{f, j}								
PC Production	2	1	2	4	8	0.4	0.8	\$742.70
AMF Production	2	1	2	3	6	0.3	0.6	\$557.03
AR Production	2	1	2	2	4	0.2	0.4	\$371.35
HF Production	2	1	2	1	2	0.1	0.2	\$185.68
iv. Container leak tight method								
PC Production	N/A							
AMF Production	N/A							
AR Production	N/A							
HF Production	N/A							
Subtotal Labor Burden					3481.5	174.08	348.15	\$331,146.16

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 person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
TOTAL LABOR BURDEN AND COST (rounded)						4,004		\$331,146

Assumptions:

^a We have assumed that there are 10 existing sources, and that no additional new sources will become subject to the rule over the next three years. It is also assumed that affected facility owners and operators have already complied with the initial requirements including the installation of any required equipment. In addition, we have assumed that two sources under this category will hire contractors to comply with the monitoring and recordkeeping requirements of the rule while reports are developed by the source personnel.

^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that there will be no new sources over the next three years of this ICR. We have also assumed that all existing sources have already complied with this one-time activity.

^d All major sources must submit startup, shutdown, malfunction reports semiannually when actions are taken in the event of a startup, shutdown, or malfunction that are consistent with the source's SSM plans. Sources can submit this information with the periodic reports.

^e The rules requires that all sources submit periodic reports (semiannually or according to the schedule for Title V).

^f The standards for equipment leak requires the submittal of an initial report and semiannual reports of leak detection and repair (LDAR) and any changes to the processes, monitoring frequency and initiation of a quality improvement program. We have assumed that sources are submitting the required LDAR information with the periodic reports.

^g Visual inspections are required once per shift with a total of three shifts per day, at seven days per week, for 52 weeks per year. (3x7x52) for a total of 1,092 inspections per year.

^h We have determined that, based on the industry representative in the PC category, the two sources' use of contractor support to complete the LDAR related monitoring will cost an estimated \$8,000.

ⁱ We have assumed that control equipment monitoring should be done on a weekly basis.

^j We have assumed that there will be some labor hours associated with rule analysis and training per year.

Table 2: Average Annual Agency Burden and Cost- NESHAP for Source Categories: Generic Maximum Achievable Control Technology Standards (40 CFR part 63, subpart YY) (Renewal)

Burden item	(A) Technical Person Hours Per Occurrence	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
Review Reports								
1. Initial requirements								
a. Initial notification ^c	2	1	2	0	0	0	0	\$0
b. Performance test ^{c,d}	2	1	2	0	0	0	0	\$0
c. Compliance status ^c	4	1	4	0	0	0	0	\$0
d. Performance test reports ^{c,d}	4	1	4	0	0	0	0	\$0
2. Periodic requirements								
a. Startup, shutdown, malfunction reports ^e	2	1	2	0	0	0	0	\$0
b. Periodic reports ^e	3	2	6	10	60	3	6	\$2,797.26

Burden item	(A) Technical Person Hours Per Occurrence	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
c. Leak detection and repair (LDAR) reports ^f	3	2	6	0	0	0	0	\$0
Subtotals Labor Burden and Cost					60	3	6	\$2,797.26
TOTAL LABOR BURDEN AND COST (rounded)						69		\$2,797

Assumptions:

^a We have assumed that there are 10 existing sources, and that no additional new sources will become subject to the rule over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$56.02 for Managerial (GS-13, Step 5, \$35.01 x 1.6), \$41.57 for Technical (GS-12, Step 1, \$25.98 x 1.6) and \$22.50 Clerical (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

^c We have assumed that there will be no new sources over the next three years of this ICR, We have also assumed that all existing sources have already complied with this one-time activity.

^d We have assumed that the Agency will not have additional burden from sources conducting performance tests due to a process change that may or may not result in the source meeting additional requirements.

^e We have assumed that all sources have already developed a startup, shutdown and malfunction (SSM) plan. We have further assumed that sources are submitting their information on SSM with the periodic report which is submitted on a semiannual basis.

^f The equipment leak standards require the submittal of an initial report and semiannual report of leak detection and repair (LDAR) program experiencing any changes to the processes, monitoring frequency and initiation of a quality improvement program. We have assumed that sources are submitting the required LDAR information with the periodic reports.

