SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal), EPA ICR Number 1783.06, OMB Control Number 2060-0357

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Product were proposed on December 27, 1996 and promulgated on October 7, 1998. These regulations apply to new and existing facilities that engage in the manufacture of flexible polyurethane foam products that are a major source of hazardous air pollutants (HAPs). This includes facilities making slabstock flexible polyurethane foam (slabstock foam), rebond flexible polyurethane foam (rebond foam), and/or molded flexible polyurethane foam (molded foam). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart III.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

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. 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 U. S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 132 respondents per year will be subject to the standard, and no new additional respondents per year will become subject to the standard.

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

The "Affected Public" are publicly owned and operated by flexible polyurethane foam production facilities. None of the facilities are owned by either state, local and tribal agencies or the Federal government. The burden to the "Affected Public" may be found below in Table 1:

Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal). The burden to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

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, HAP emissions from flexible polyurethane foam production facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart III.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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 either 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 pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

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

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

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

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 (77 FR 63813) on October 17, 2012. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Polyurethane Foam Association, at (865) 657-9840;

and 2) the Spray Polyurethane Foam Alliance, at (800) 523-6154.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to 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. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of flexible polyurethane foam production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3086, which corresponds to the North American Industry Classification System (NAICS) code 326150 for Urethane and Other Foam Product (except Polystyrene) Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III).

A source must make the following reports:

Notifications	
Initial notification	63.1306(a)
Application for approval of construction or reconstruction	63.1306(b)
Pre-compliance report	63.1306(c)
Notification of compliance status	63.1306(d)
Change in selected emission limitation/compliance method	63.1306(f)(1)&(2)
Request for extension of compliance, adjustments to time periods, and changes in information	63.9(c), 63.9(i), 63.9(j)

Reports	
Semiannual compliance reports	63.1306(e)
Annual compliance certification	63.1306(g)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)

Recordkeeping	
All reports and notifications	63.10(b)
Record of applicability	63.10(a)
Slabstock sources shall maintain storage vessel records, equipment leaks record, HAP auxiliary blowing unit (ABA) records for emission point specific limitations or source-wide limitations, records of product data sheet for HAP cleaners, and if using a recovery device, the records of the recovered HAP ABA recordkeeping program, the monitoring device's Quality Assurance (QA) data, parameter monitoring, and the HAP ABA recovered.	63.1307(a-f)
Molded/rebond foam sources shall maintain records of product data sheets for each compound other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, and the product data sheets for each mold release agent used that has HAPs.	63.1307(g-h)
Records are required to be retained for five years; however, only the data of the most recent two years must be kept on-site	63.10(b)(1)

Electronic Reporting

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.

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.
Slabstock foam sources shall install, calibrate, maintain, and operate Continuous Monitoring System (CMS) for flow rate or pump revolutions to monitor continuously the amount of polyol added and for HAP ABA.
Performance tests are not required by MACT, Subpart III. However, sources are required to use Reference Method 18 of part 60 for HAP concentration; Method 25A of part 60 for organic compounds measurements; Method 21 of part 60 for equipment leaks; and American Society for Testing and Materials (ASTM) method D3574-91, Standard Test methods for

Respondent Activities
Flexible Cellular Materials-Slab, Bonded, and Molded.
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.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., flow rate monitoring and pump revolution per minute monitoring). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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 Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS 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 OTIS 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.

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

5(c) Small Entity Flexibility

There is a distribution of business sizes. EPA estimates that approximately 59 percent of currently affected facilities, or 77 facilities, may be small entities (i.e., small businesses). During this renewal, the proposed and final rules were reviewed to estimate the number of small entities potentially affected. According to the Proposed Rule (61 FR 68406):

> Due to insufficient data on the ownership of plants in the flexible polyurethane foam industry, an analysis of each parent company in the industry was not feasible. Consequently, the EPA used data collected in the section 114 survey to evaluate the impact on small businesses based on model facilities. That analysis indicates that there is a total of approximately 121 businesses (31 slabstock, 90 molded) that are affected by the proposed regulation, of which approximately 71 are small businesses (18 slabstock, 53 molded). Given the results of the analysis and the use of worst-case assumptions in the closure analysis, the EPA believes that the affect of the proposed regulation on small businesses will be minimal.

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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam

Product (40 CFR Part 63, Subpart III) (Renewal).

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 concept of burden under the Paperwork Reduction Act. Wherever 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 9,047 hours (Total Labor Hours from Table 1 below). 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	$121.44 ($57.83+ 110%)
Technical	$100.23 ($47.73 + 110%)
Clerical	$50.51 ($24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, "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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs. We estimate that $29,786 is required to purchase each leak detector and $5,250 is required for annual operation and maintenance of the detector. However, we have also assumed that no new sources will become subject to these standards and that the existing sources conducting modifications will not be purchasing new monitoring equipment. Additionally, sources are electing to comply with the source-wide emission limit and are not using bag leak detectors, and the monitors were already in place prior to promulgation of this rule.

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 $21,870.

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

Managerial	$62.27 (GS-13, Step 5, $38.92 + 60%)
Technical	$46.21 (GS-12, Step 1, $28.88 + 60%)
Clerical	$25.01 (GS-6, Step 3, $15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2012 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 below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

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 132 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 132 per year.

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

Number of Respondents					
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	6	132	0	6	132
2	6	132	0	6	132
3	6	132	0	6	132
Average	6	132	0	6	132

[1] New respondent include sources with constructed, reconstructed and modified affected facilities. We assume that 6 of the existing sources will reconstruct or modify their facility.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 132.

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
Notification of modification / reconstruction [1]	6	1	0	6
Pre-compliance report [1]	6	1	0	6
Notification of compliance status [1]	6	1	0	6
Semiannual reports[2]	59	2	0	118
Annual compliance certification[2]	73	1	0	73
			Total	209

[1] New respondents are defined for this calculation as sources that recently became subject to the rule and existing sources that have modified/reconstructed their facilities.
[2] There are 59 existing slabstock foam producers and 73 existing molded/rebond foam producers which total 132 respondents.

The number of Total Annual Responses is 209.

The total annual labor costs are $874,812. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam

Product (40 CFR Part 63, Subpart III) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 9,047 hours at a cost of $874,812. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 43 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $0. 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 next three years is estimated to be 485 labor hours at a cost of $21,870. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden and are reiterated in this ICR.

There is an increase in total labor costs to the respondents and the Agency due to an increase in labor rates. The increase is not due to any program changes.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 43 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; 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; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and 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 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-2012-0668. 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 docket center is (202) 566-1752. 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0668 and OMB Control Number 2060-0357 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)

Burden Items	A Person Hours per Occurrence	B No, of occurrences per respondent per year	C Person hours per respondent per year (C = A x B)	D Respondents per year [a]	E Technical person hours per year (E=CxD)	F Managerial person hours per year (Ex0.05)	G Clerical person hours per year (Ex0.1)	H Total Costs per year ($) [b]
1. Applications	N/A							$0
2. Survey and studies	N/A							$0
3. Reporting Requirements								
A. Read Instructions	1	1	1	6	6	0.3	0.6	$668.12
B. Required Activities								
i. Monitoring of emissions operations [c, d]								
Slabstock Sources								
Metering pump calculations	4	2	8	59	472	23.6	47.2	$52,558.62
Storage tank measurements	1	12	12	59	708	35.4	70.8	$78,837.92
ii. Molded/Rebond Sources	Included in 4E							
C. Create Information	Included in 3B and 4E							
D. Gather Existing Information	Included in 3B and 4E							
E. Write Report								
Initial notification [e]	2	1	2	0	0	0	0	$0
Notification of modification/ reconstruction [a]	2	1	2	6	12	0.6	1.2	$1,336.24
Pre-compliance Report	4	1	4	6	24	1.2	2.4	$2,672.47
Notification of Compliance status [a]								
i. Stablestock foam producers	16	1	16	3	48	2.4	4.8	$5,344.94
ii. Molded/rebond foam producers	4	1	4	3	12	0.6	1.2	$1,336.24
Semiannual reports [f]	4	2	8	59	472	23.6	47.2	$52,558.62
Annual compliance	2	1	2	73	146	7.3	14.6	$16,257.54

certifications [g]								
Notification of special compliance requirements [h]	2	1	2	0	0	0	0	$0
Request for extension of compliance, adjustments to the time periods, and changes in information [i]	2	1	2	1	2	0.1	0.2	$22.71
Change in selected compliance method or emission limit [j]	1	1	1	1	1	0.05	0.1	$111.35
Progress report for extensions	4	2	8	1	8	0.4	0.8	$890.82
Subtotal for Reporting Requirements						**2,198**		**$211,593.42**
4. Recordkeeping Requirements								
A. Read instructions	Included in 3A							
B. Plan activities	Included in 3B							
C. Implement activities	Included in 3B							
D. Develop record system	40	1	40	0	0	0	0	$0
E. Time to enter and transit information: records of monitoring and operations [k]								
Slabstock foam producers	8	12	96	59	5,664	283.2	566.4	$630,703.39
Molded/rebond foam producers	4	1	4	73	292	14.6	29.2	$32,515.08
F. Train personnel	40	1	40	0	0	0	0	$0
G. Audits	N/A							$0
Subtotal for Recordkeeping Requirements						**6,849**		**$663,218.47**
TOTAL ANNUAL BURDEN and COST (rounded)						**9,047**		**$874,812**

Assumptions:

a) We have assumed that there are approximately 59 existing slabstock foam producers and 73 existing rebond/molded foam producers for a total of 132 existing foam producers (i.e., respondents) that are major sources and subject to the NESHAP subpart III. We have further assumed that there will be no new foam producers commencing operations over the period of this ICR. However, we have assumed that 6 existing respondents (3 slabstock foam producers and 3 molded/rebound foam producers) a year will be conducting some type of modification but they will continue to meet compliance requirements while the reconstruction/modification application is under review. Therefore, the average number of respondents per year for this ICR is estimated to be 132.

b) This ICR uses the following labor rates: Managerial $121.44 ($57.83 + 110%); Technical $100.23 ($47.73 + 110%); and Clerical $50.51 ($24.05 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

c) We have assumed that all slabstock foam producers are meeting the source-wide emission limit and control diisocyanate emissions monitoring, recordkeeping and reporting requirements. Molded/rebond foam producers are required to eliminate the use of HAP or HAP-based materials, cleaners or agents and only have recordkeeping and reporting requirements.

d) Sources are required to use Method 21 of Appendix A of part 63 for equipment leaks; Standard Methods for Flexible Cellular Materials for determining foam properties, ASTM D3574-91; Method 18 of part 60 for HAP concentration; and Method 25A of 40 CFR part 60 for organic compounds.

e) We have assumed that all existing sources are in compliance with the initial rule requirements.

f) Slabstock foam producers (i.e., 59 respondents) are required to submit semiannual reports.

g) All sources are required to submit compliance certifications annually. However, we have assumed that all of the existing molded foam producer sources that are major sources are collocated at slabstock foam production sites, and therefore, there won't be an additional reporting burden due to meeting this requirement concurrently with the semiannual compliance status reports.

h) We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance date for this rule has passed. Owners or operators of an affected source for which reconstruction occurs after the proposal date of the subject rule under 40 CFR part 63 and before the promulgation of such rule or before the proposal date of a relevant standard established pursuant to section of 112(f) of the Clean Air Act, is required to submit this report, as described in section 63.6(b)(3) and (4) of the General Provisions of part 63.

i) This notification is required when an owner or operator requests approval of an extension of a time period or postmark deadline, according to section 63.9(i) of the General Provisions under
part 63.

j) We have assumed that one existing source will be changing its compliance period from monthly rolling to annual rolling or vice-versa.

k) The types of records include: storage vessel records; equipment leak records; HAP ABA records for point-specific and source-wide limitations for both rolling annual compliance and monthly compliance alternative records; recovery device records, and proper maintenance of product data sheets.

N/A = Not applicable

Table 2: Average Annual EPA Burden and Cost – NESHAP for Flexible Polyurethane Foam Product (40 CFR Part 63, Subpart III) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences / Plant/Year	(C) EPA Hours/Year (C=A*B)	(D) Plants/ Year [a]	(E) Technical Hours/Year (C*D)	(F) Managerial Hours/Year (E*0.05)	(G) Clerical Hours/Year (E*0.10)	(H) Total Costs/Year ($) [b]
Initial Notification [c]	2	1	2	0	0	0	0	$0
Notification of Reconstruction/ Modification	2	1	2	6	12	0.6	1.2	$621.89
Pre-compliance Report	2	1	2	6	12	0.6	1.2	$621.89
Notification of Special Compliance Requirements [d]	2	1	2	0	0	0	0	$0
Notification of Compliance Status [d]	2	1	2	6	12	0.6	1.2	$621.89
Semiannual Reports [e]	2	2	4	59	236	11.8	23.6	$12,230.58
Annual Compliance Certifications [f]	2	1	2	73	146	7.3	14.6	$7,566.38
Change in Selected Compliance Method or Emission Limit [g]	2	1	2	1	2	0.1	0.2	$103.65
Progress Report for Extensions, Adjustments to Time Periods, and Changes in Information [g]	2	1	2	1	2	0.1	0.2	$103.65
TOTAL ANNUAL BURDEN					**485**			**$21,870**

Assumptions:

a) We have assumed that there are approximately 59 existing slabstock foam producers and 73 existing rebond/molded foam producers for a total of 132 respondents. We have further assumed that about 6 existing respondents a year will be conducting some type of modification at its facility and that there will be no new sources over the period of this ICR. Therefore, the average number of respondents per year is estimated to be 132.

b) This ICR uses the following labor rates: Managerial $62.27 (GS-13, Step 5, $38.92 + 60%); Technical $46.21 (GS-12, Step 1, $28.88 + 60%); and Clerical $25.01 (GS-6, Step 3, $15.63 + 60%). These rates are from the OPM, 2013 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. This ICR assumes that Clerical hours are 10 percent of Technical hours and Managerial hours are 5 percent of Technical hours.

c) We have assumed that all existing sources are in compliance with the initial rule requirements. In addition, we have assumed that facilities seeking to reconstruct will continue to meet compliance requirements while application is under review.
d) We have determined that there will be no sources submitting a special compliance report for this ICR since the compliance date for this rule has passed.
e) Slabstock foam producers (i.e., 59 sources) are required to submit semiannual reports.
f) All respondents (i.e., 132 foam producers) are required to submit annual compliance certifications. However, we have assumed that slabstock sources will be complying with this requirement concurrently when submitting semiannual reports. Molded foam producers would still need to meet this requirement separately.
g) We have assumed that one existing source will be changing its compliance period from monthly rolling to annual.