SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal), EPA ICR Number 2457.04, OMB Control Number 2060-0682.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) were proposed on March 29, 1995; promulgated on September 12, 1996; and most-recently amended on March 27, 2014. These regulations apply to each new and existing thermoplastic product process units (TPPU) and associated equipment that produce the subset of polymers and resins known as "Group IV Polymers and Resins" that is a major source of organic hazardous air pollutants (HAPs). Group IV polymers and resins include the following source categories: Acrylonitrile Butadiene Styrene (ABS), Methyl Methacrylate Acrylonitrile Butadiene Styrene (MABS), Methyl Methacrylate Butadiene Styrene (MABS), Nitrile Resin, Polyethylene Terephthalate (PET), Polystyrene (PS), and Styrene Acrylonitrile (SAN). The following processes are excluded from this rule: research and development facilities; polymerization processes occurring in a mold; processes which manufacture binder systems containing thermoplastic product for paints, coatings, or adhesives; finishing processes including equipment such as compounding units, spinning units, drawing units, extruding units, and other finishing steps; and solid state polymerization processes. New facilities include those that commenced construction or reconstruction after the date of proposal and meets the new source definitions at §63.1310(i). This information is being collected to assure compliance with 40 CFR Part 63, Subpart JJJ.

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 containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

All the TPPU units in the United States are owned and operated by the thermoplastic resin manufacturing industry (aka the "Affected Public"). None of the facilities in the United

States are owned by either state, local, tribal or the Federal government. They are all privately-owned, commercial businesses. We assume that they will all respond to EPA inquiries. The 'burden' to the "Affected Public" may be found at the end of this document in Table 1: Annual Respondent Burden and Cost - NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal). The Federal Government's 'burden' is attributed entirely to work performed by Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

Based on our consultations with industry representatives, there are an average of 1.1 affected process units at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 27 affected process units (TPPUs) at 24 facilities (i.e., respondents) per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This ICR reflects a decrease in the number of affected respondents from the prior ICR, based on data collected as part of other recent EPA rulemakings.

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

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 TPPUs and associated equipment

that produce Group IV polymers and resins either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart JJJ.

2(b) Practical Utility/Users of the Data

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 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards 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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are 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 JJJ.

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, duplication does not exist.

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* (84 FR 19777) on May 6, 2019. No comments were received on the 'burden' published in the *Federal Register* for this renewal.

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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 24 respondents will be subject to these standards over the three-year period covered by this ICR. The decrease in facilities from the previous ICR is based on data collected as part of other recent EPA rulemakings, including a review of chemical manufacturing facilities identified as subject to Subpart JJJ through review of facility air permits and EPA's ICIS and ECHO databases.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the American Composites Manufacturers Association (ACMA), at (703) 525-0511, and the Plastics Industry Association, at (202) 974-5200. It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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 these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that 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 these 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 either 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 these standards 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 any existing or new TPPUs and associated equipment that produce Group IV polymers and resins that are a major source of HAP emissions. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2821, which corresponds to the North American Industry Classification System (NAICS) 325211 for Plastic Material and Resin Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ).

A source must make the following reports:

Notifications	
Notification of Compliance Status	§63.1331(a)(4), §63.1335(e)(5)
Notification of storage vessel inspection	§63.1335(e)(7)(i)
Notification of performance tests	§63.1333(a)(4)
Requirements for batch process vents in the Notification of Compliance Status	§63.1327(a)
PCCT requirements in Notification of Compliance Status	§63.1329(c)(3)
Notification of alternative test method	§63.7(f)

Notifications	
Notification of special compliance requirements	§63.9(d)

Reports	
Reports of malfunctions	§63.1335(b)(1)(ii)
Pre-compliance report for requesting an extension of compliance; requesting approval to use alternative monitoring parameters, alternative continuous monitoring and recordkeeping or alternative controls; requesting approval to use engineering assessment to estimate emissions from a batch emissions episode; or wishing to establish parameter monitoring levels according to the procedures in §63.1334(c) or (d)	§63.9(c), §63.1335(e)(3)
Progress report for affected sources that receiving an extension of compliance	§63.10(d)(4)
Emissions averaging plan	§63.1335(e)(4)
Semiannual or quarterly periodic reports	§63.1335(e)(6)
Request of approval for a nominal control efficiency for use in calculating credits for an emissions average	§63.1335(e)(7)(ii)
Report of changes to the primary product for a TPPU or process unit as required by §§63.1310(f)(3)(iii), 63.1310(f)(9), or 63.1310(f)(10)(iii)(C)	§63.1335(e)(7)(iii)
Report of newly constructed/reconstructed sources subject to §63.1310(i)(1) or (i)(2) including a description of the process change or addition, planned start-up date and appropriate compliance date, and identification of the group status of emission points (except equipment leak components subject to §63.1331).	§63.1335(e)(7)(iv)
Operating permit application	§63.1335(e)(8)
PRD requirements in Periodic reports	§63.1335(e)(6)(xiii)
Equipment leak requirements in Periodic reports	§63.1331(a)(5), §63.182(a)(3), §63.182(d)
Equipment leak requirements in Periodic reports for “multiple-end-finisher” subcategory	§63.1331(c)(4)
PCCT requirements in Periodic reports for “multiple-end-finisher” subcategory	§63.1329(c)
Reports for PET and polystyrene affected sources using a control or recovery device to comply with §63.1316	§63.1315(a), §63.1320(a)
Report for PET affected sources using a dimethyl terephthalate process	§63.1320(b)
Reports for batch process vents	§§63.1327(b)-(g)

Reports	

A source must keep the following records:

Recordkeeping	
Records must be maintained for 5 years.	§63.1335(a)
Record of information, data, and analyses used to document the basis for the determination that the TPPU does not use or manufacture any organic HAP	§63.1310(b)
Record of malfunctions	§63.1335(b)(1)(i)
Record of data values measured by monitoring system	§63.1335(d)(1)
Record of measured data value or block average values for 1 hour or shorter periods calculated from all measured data values during each period	§63.1335(d)(2)
Record of daily average (or batch cycle daily average) values of each continuously monitored parameter	§63.1335(d)(3)
Record of all recorded values for a given monitored parameter during an operating day are within the limits established in the Notice of Compliance Status or operating permit	§63.1335(d)(6)
Record of times and durations of breakdowns, repairs, calibration checks, zero (low-level) and high-level adjustments, or periods of non-operation	§63.1335(d)(7)
Record of CMS calibration checks and maintenance	§63.1335(d)(8)
Record required as a condition of a waiver of recordkeeping or reporting requirements	§63.1335(d)(9)
List of identification numbers for PRDs equipped with closed-vent system and control device, subject to provisions in §63.1331(a)(9)(iv)	§63.1335(d)(10)(i)
List of identification numbers for PRDs subject to provisions in §63.1331(a)(9)(i)	§63.1335(d)(10)(ii)
List of identification numbers for PRDs equipped with rupture disks, subject to provisions in §63.1331(a)(9)(ii)(B)	§63.1335(d)(10)(iii)
Record of the dates and results of the Method 21 of 40 CFR Part 60, Appendix A, monitoring following a pressure release for each PRD subject to provisions in §63.1331(a)(9)(i) and (ii).	§63.1335(d)(10)(iv)
Record of pressure release to the atmosphere for PRDs in organic HAP service subject to §63.1331(a)(9)(iii)	§63.1335(d)(10)(v)

Recordkeeping	
Records for PET and polystyrene affected sources using a control or recovery device to comply with §63.1316	§63.1315(a), §63.1319(a)
Record for demonstrating compliance with the applicability determination procedure for PET affected sources using a dimethyl terephthalate process	§63.1319(b)
Record for PET and polystyrene affected sources demonstrating compliance with temperature limits for final condensers	§63.1319(b)
Group determination records for batch process vents	§63.1326(a)
Compliance demonstration records for batch process vents or aggregate batch vent stream	§63.1326(b)
Establishment of parameter monitoring level records for batch process vents	§63.1326(c)
Group 2 batch process vent continuous compliance records	§63.1326(d)
Controlled batch process vent continuous compliance records	§63.1326(e)
Aggregate batch vent stream continuous compliance records	§63.1326(f)
Documentation supporting the establishment of the batch mass input limitation for batch process vents	§63.1326(g)

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. This rule requires that respondents submit electronic copies of required performance test reports through CDX using the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The CDX is the EPA's portal for submittal of electronic data using the EPA-provided ERT to generate electronic reports of performance tests and evaluations. The ERT generates an electronic report package that will be submitted using the CEDRI. The submitted report package will be stored in the CDX archive (the official copy of record) and the EPA's public database called WebFIRE.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature, pH, scrubber liquid flow rates and pressure, pressure drop, gas flow rates, and specific gravity of the absorbing liquid for control devices.

Respondent Activities
Perform initial performance test, Reference Methods 1 or 1A, 2, 2A, 2C, or 2D, 18, 21, 25A, 26 or 26A, and 301 tests, and repeat performance tests if necessary.
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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

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

Agency Activities
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.

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. Performance test reports are used by the Agency to discern a source's initial capability to comply with these emission standards and to 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. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The 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

The majority 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 these regulations. 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 to be the minimum requirements 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 141,000 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.

Several burden items use estimates directly from the Hazardous Organic NESHAPs (HON) (40 CFR Part 63, Subparts F, G, H and I) because this Subpart specifically references parts of the HON for the heat exchanger, storage vessel, continuous process vents, wastewater, and equipment leak requirements of this rule.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$141.06 ($67.17+ 110%)
Technical	$120.27 ($57.27 + 110%)
Clerical	$58.67 ($27.94 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "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 costs associated with the information collection activities in the subject standards 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 monitors 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 Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Electronic indicators for PRD [a]	$15,930	0	$0	$0	0	$0
Monitoring equipment for process vents and wastewater [b]	$25,000	0	$0	$275,000	27	$7,425,000
Monitoring equipment for equipment leaks [b]	$1,400	0	$0	$0	0	$0
Total (rounded) [c]			**$0**			**$7,430,000**

[a] Based on costs from the 2014 final rule, the total capital cost for the electronic indicators for PRDs across all facilities is estimated to be $3,814,120 (see ICR No. 2457.02). This cost has been annualized by multiplying the

capital recovery factor by the capital cost. The capital recovery factor is based on an interest rate of 7 percent and an assumed equipment life of 10 years. (Capital cost per monitoring system = $3,814,120 x 0.142 / 34 monitoring system = $15,930/monitoring system. The operation and maintenance (O&M) costs expected from operating the electronic indicators is assumed to be minimal.

[b] Capital and O&M costs for process vents, wastewater, and equipment leaks are based on estimates for similar requirements in the HON (Subparts F, G, H and I). The HON uses the following assumptions:

1. Subpart G

   -Total Capital/Startup Cost of Monitoring Equipment: The cost to purchase monitoring equipment is approximately $20-30K for process vents and wastewater operations, or an average of $25K with a 10-year life expectancy and a 7 percent depreciation rate, or $2,225 per year. There are no associated costs for transfer racks and storage tanks. Only new sources need to buy monitoring equipment.
   -Total Cost of Operation and Maintenance of Monitoring Equipment: The cost to industry associated with the operation and maintenance (O&M) is approximately $100-500K per year (capital/startup depreciation not included) for reactor process vents and wastewater operations. The cost associated with the operation and maintenance is $50-100K per year (capital/startup depreciation not included) for distillation unit process vents. There are no associated costs for transfer racks and storage tanks. The average O&M cost is assumed to be the average of the two ranges, or $275,000 per year. Operation and maintenance incur for both new and existing sources.

2. Subpart H

   -Total Capital/Startup Cost of Monitoring Equipment: Only new sources will buy an organic volatile analyzer. Estimate the average cost of a monitor is $7,000 with a 5-year expected life. The equipment is not capitalized, so no discount rate applies. The average annual cost is, therefore, $7,000/5, or $1,400/yr.
   -Total Cost of Operation and Maintenance of Monitoring Equipment: The operation of the monitors is included in the monitoring equipment costs. Maintenance costs on these units is incidental; therefore, no maintenance or operation costs are incurred.

3. The HON does not estimate any capital or O&M costs for Subparts F and I.

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

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $7,430,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $7,430,000. These are recordkeeping costs.

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 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 average annual Agency cost during the three years of the ICR is estimated to be $39,100.

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

Managerial	$66.62 (GS-13, Step 5, $41.64 + 60%)
Technical	$49.44 (GS-12, Step 1, $30.90 + 60%)
Clerical	$26.75 (GS-6, Step 3, $16.72 + 60%)

These rates are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (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 24 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 24 per year.

The number of respondents is calculated using the following table that 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 [a]	(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	24	0	0	24
2	0	24	0	0	24
3	0	24	0	0	24
Average	0	24	0	0	24

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

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 24.

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

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of compliance status	0	1	0	0
Notification of storage vessel inspection	24	6	0	144
Notification of performance tests	0	1	0	0
Notification of alternative test method	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Pre-compliance report	0	1	0	0
Progress reports for affected sources receiving an extension of compliance	0	2	0	0
Emissions averaging plans	0	1	0	0
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging	0	1	0	0
Updates to emissions averaging plan	1	1	0	1
Report of changes to the primary product for a TPPU or process unit	3	1	0	3
Report of newly constructed/reconstructed source	0	1	0	0
Operating permit application	0	1	0	0
Report for batch process vents	3	1	0	3
Report for PET sources using a dimethyl terephthalate process	2	1	0	2
Malfunction Reports	3	1	0	3
Semiannual reports [a]	23	2	0	46
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting	4	4	0	16
Total (rounded) [b]				**218**

[a] There are 27 affected sources (PRD) monitored at 24 facilities. For the 23 sources qualifying for semiannual reports, this information will be included in the required periodic report and is not considered a separate response. For the 4 sources required to submit quarterly reports, we assume this information will be submitted quarterly as a separate report.

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

The number of Total Annual Responses is 218.

The total annual labor costs are $16,300,000. Details regarding these estimates may be

found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 141,000 hours. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

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.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 647 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $7,430,000. 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 810 labor hours at a cost of $39,100; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal).

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.

6(f) Reasons for Change in Burden

There is a decrease in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The decrease in burden is due to a decrease in the number of respondents. This decrease was determined based on data collected as part of other recent EPA rulemakings, including a review of chemical manufacturing facilities identified as subject to Subpart JJJ through review of facility air permits and EPA's ICIS and ECHO databases. Due to the decrease in the number of identified facilities, we assume there is zero or negative industry growth over the next three

years. Therefore, the total respondent labor burden and operation and maintenance (O&M) costs have decreased in this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 647 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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-2016-0009. 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), WJC 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-2016-0009 and OMB Control Number 2060-0682 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 Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hours per respondent (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours (E=CxD)	(F) Management person-hours (F=Ex0.05)	(G) Clerical person-hours (G=Ex0.1)	(H) Total Cost [b] ($)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	N/A							
4. Reporting Requirements								
A. Familiarize with regulatory requirements [c]	40	1	40	24	960	48	96	$127,862.40
B. Required activities [d]	6.08	13	79	27	2,134	107	213	$284,238.12
C. Create information [d]	17.85	99	1,767	27	47,713	2,386	4,771	$6,354,901.13
D. Gather existing information [d]	2.5	677	1,693	27	45,698	2,285	4,570	$6,086,450.03
E. Write report								$0
Notification of compliance status	20	1	20	0	0	0	0	$0
Notification of storage vessel inspection [e]	5	6	30	24	720	36	72	$95,896.80
Notification of performance tests	10	1	10	0	0	0	0	$0
Notification of alternative test method [f]	5	1	5	0	0	0	0	$0
Notification of special compliance requirements [g]	5	1	5	0	0	0	0	$0
Report of newly constructed/reconstructed source	2	1	2	0	0	0	0	$0
Operating permit application	40	1	40	0	0	0	0	$0
Precompliance report [h]	40	1	40	0	0	0	0	$0
Progress reports for affected sources receiving an extension of compliance [i]	4	2	8	0	0	0	0	$0

Emissions averaging plans [j]	120	1	120	0	0	0	0	$0
Request for approval for a nominal control efficiency for use in calculating credits for emission averaging [j]	2	1	2	0	0	0	0	$0
Updates to emissions averaging plan [k]	20	1	20	1	20	1	2	$2,663.80
Semiannual periodic reports [l]	80	2	160	23	3,680	184	368	$490,139.20
Quarterly periodic reports for facilities using emission averaging and where a respondent did not qualify for semiannual reporting [l]	80	4	320	4	1,280	64	128	$170,483.20
Semiannual periodic reports (PRD monitoring)	5.5	2	11	27	297	15	30	$39,557.43
Semiannual periodic reports (Equip. leaks)	3	2	6	1	6	0.3	0.6	$799.14
Semiannual periodic reports (PCCT)	1	2	2	1	2	0.1	0.2	$266.38
Report of changes to the primary product for a TPPU or process unit [m]	2	1	2	3	6	0.3	0.6	$799.14
Report for batch process vents [n]	2	1	2	3	6	0.3	0.6	$799.14
Report for PET sources using a dimethyl terephthalate process [o]	2	1	2	2	4	0.2	0.4	$532.76
Malfunction Reports [p]	8	1	8	3	24	1.2	2.4	$3,196.56
Affirmative defense	30	-	-	0	0	0	0	$0
Subtotal for Reporting Requirements					***117,932***			***$13,658,585***
5. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 4A							
B. Plan activities [d]	See 4B							
C. Implement activities [d]	See 4B							
D. Develop record system	40	1	40	0	0	0	0	$0
E. Time to enter information [d]								
Plan Activities	See 4B							
Create, Test, Research, Develop	See 4C							
Gather information, Monitor, Inspect	See 4D							

Process, Compile, Review	20	1	20	27	540	27	54	$71,922.60
F. Time to train personnel [d]	5.25	4	21	27	567	28	57	$75,518.73
G. Time to Record and disclose information [d]	17.46	26	454	27	12,258	613	1,226	$1,632,643.02
H. Store, file and maintain records [d]	6.77	35	237	27	6,399	320	640	$852,282.81
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***22,729***			***$2,632,367***
TOTAL LABOR BURDEN AND COST (rounded) [q]					**141,000**			**$16,300,000**
TOTAL CAPITAL AND O&M COST (rounded) [q]								**$7,430,000**
GRAND TOTAL (rounded) [q]								**$23,700,000**

Assumptions:

[a] We assume there are an average of 27 sources (TPPUs) at 24 facilities subject to the rule and no additional sources per year will become subject to the rule during the three-year period of this ICR.

[b] This ICR uses the following labor rates for privately-owned sources: $141.06 for managerial, $120.27 for technical, and $58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "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.

[c] This ICR assumes all existing sources will have to familiarize with the regulatory requirements each year.

[d] Since the activities within each burden category (i.e., process vents, equipment leaks, wastewater, heat exchangers, and equipment leaks) can vary significantly, it is too inaccurate to assume an average activity time (Column A) to calculate hours per facility (Column C). Therefore, we estimated the total hours per facility and the number activities per year (Column B) to back-calculate the person-hrs per occurrence value in Column A. The burden for these activities are based on the approach used in the HON (Subparts F, G, H, and I). Since so much variability exists, it is important to note that this is an estimate and is only used to back-calculate Column A.

[e] This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

[f] This ICR assumes that 5% of new sources will use alternative test methods.

[g] This ICR assumes that 5% of new sources will use special compliance requirements.

[h] This ICR assumes that 10% of new sources will have to submit precompliance reports.

[i] This ICR assumes that all existing sources are already in compliance; new sources cannot receive compliance extensions.

[j] This ICR assumes 10% of existing facilities will elect to use emission averaging and that all existing respondents were expected to be in compliance as of the 2014 final rule. New facilities cannot use emissions averaging. This ICR also assumes no existing facilities will elect to use nominal control after submitting the initial emissions averaging plan.

[k] This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan.

[l] This ICR assumes that 5% of the 27 sources (TPPUs) will not qualify for semiannual reports and will be required to submit quarterly reports. (27 TPPUs x 0.05 = 1.35) In addition, 10% of the 24 facilities using emissions averaging are required to submit quarterly reports. (24 respondents x (0.10) = 2.4). Therefore we estimate quarterly reports will be submitted for 4 sources (1.35 + 2.4 = 3.75, rounded to 4). The remaining 23 sources will all submit semiannual reports.

[m] This ICR assumes that 10% of sources will have changes to their primary product. (27 sources x 0.10 = 2.7, rounded to 3)

[n] This ICR assumes that 10% of sources will makes changes to batch process vents. (27 sources x 0.10 = 2.7, rounded to 3)

[o] This ICR assumes that 10% of PET sources will make changes to a dimethyl terephthalate process. There is a total of 15 PET facilities subject to the rule. (15 facilities x 1.1 sources/facility x 10% = 1.65 sources, rounded to 2)

[p] This ICR assumes that 10% of sources will have to submit malfunction reports. (27 sources x 0.10 = 2.7, rounded to 3)

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) Number of occurrences per year	(C) EPA Person-hours per plant (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours (E=CxD)	(F) Management person-hours (F=Ex0.05)	(G) Clerical person-hours (G=Ex0.1)	(H) Total Cost [b] ($)
Activity								
1. Performance Tests: Initial	40	1	40	0	0	0	0	$0
2. Performance Tests: Repeat [c]	40	1	40	0	0	0	0	$0
Reports Review:								
1. Initial [d]	2	1	2	0	0	0	0	$0
2. Implementation plan, pre-compliance report or permit [d]	20	1	20	0	0	0	0	$0
3. Compliance status [d]	40	1	40	0	0	0	0	$0
4. Review equipment leak monitoring [d]	7	1	7	27	189	9	19	$10,479.29
5. Report of construction/reconstruction [d]	2	1	2	0	0	0	0	$0
6. Notification of performance test [d]	2	1	2	0	0	0	0	$0
7. Notification of storage vessel inspection [e]	2	6	12	24	288	14	29	$15,968.45
8. Review updates to emission averaging plan [f]	5	1	5	1	5	0.25	0.5	$277.23
9. Review report of changes to the primary product for a TPPU or process unit [g]	2	1	2	3	6	0.3	0.6	$332.68
10. Review report for batch process vents [h]	2	1	2	3	6	0.3	0.6	$332.68
11. Review report for PET sources using dimethyl terephthalate process [i]	2	1	2	2	4	0.2	0.4	$221.78
12. Review of test results [d]	8	1	8	0	0	0	0	$0
13. Review malfunction reports [j]	2	1	2	3	6	0.3	0.6	$332.68
14. Review semiannual periodic reports [d, k]	3	2	6	23	138	6.9	14	$7,651.55

15. Review of quarterly periodic reports [d, k]	4	4	16	4	64	3	6	$3,548.54
TOTAL (rounded) [e]					**810**			**$39,100**

Assumptions:

[a] We assume there are an average of 27 sources at 24 facilities subject to the rule and no additional sources per year will become subject to the rule during the three-year period of this ICR.

[b] This ICR uses the following labor rates: $66.62 for managerial, $49.44 for technical, and $26.75 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2019 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] This ICR assumes 20% of sources will have to repeat performance tests.

[d] The burden for these activities are based on similar requirements in the HON (Subparts F, G, H, and I). The HON describes these activities as follows:

1. Initial represents the EPA review of all initial reports received.
2. Implementation plan or permit represents the EPA review of all implementation plans, or permit applications if submitted in lieu of an implementation plan.
3. Compliance status represents compliance status verification by the EPA for the portions of the standard which a source must comply with before the compliance date.
4. Review equipment leak monitoring represents the review and screening of periodic reports received as a result of the equipment leaks standard.
5. Report of construction/reconstruction represents the EPA review of this notification from new sources.
6. Notification of performance test represents the EPA review of this notification from new sources.
7. Review of test results represents the EPA review of performance test results for new sources.
8. Review periodic reports represents the EPA review of periodic reports.

[e] This ICR assumes that each facility will refill storage vessels that have been emptied and degassed 6 times per year.

[f] This ICR assumes 1 facility per year using an emissions averaging plan will make changes requiring an update to the emissions averaging plan. This activity may also include review of front-end or back-end operations limits.

[g] This ICR assumes that 10% of sources will have changes to their primary product.

[h] This ICR assumes that 10% of sources will makes changes to batch process vents.

[i] This ICR assumes that 10% of PET sources will make changes to a dimethyl terephthalate process. There is a total of 15 PET facilities subject to the rule. (15 facilities x 1.1 sources/facility x 10% = 1.65 sources, rounded to 2)

[j] This ICR assumes that 10% of sources will have to submit malfunction reports.

[k] This ICR assumes that 5% of the 27 sources (TPPUs) will not qualify for semiannual reports and will be required to submit quarterly reports. (27 TPPUs x 0.05 = 1.35) In addition, 10% of the 24 facilities using emissions averaging are required to submit quarterly reports. (24 respondents x (0.10) = 2.4). Therefore we estimate quarterly reports will be submitted for 4 sources (1.35 + 2.4 = 3.75, rounded to 4). The remaining 23 sources will all submit semiannual reports.

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