SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (Renewal), EPA ICR Number 2568.03, OMB Control Number 2060-0719.

1(b) Short Characterization/Abstract

This supporting statement addresses information collection activities that will be imposed by amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Manufacturing of Nutritional Yeast (40 CFR part 63, subpart CCCC), referred to in this document as the Nutritional Yeast NESHAP. In 2001, the U.S. Environmental Protection Agency (EPA) promulgated national emission standards for hazardous air pollutants for both new and existing nutritional yeast production facilities under 40 CFR part 63, subpart CCCC (66 FR 27876, May 21, 2001). Amendments to the NESHAP and a Risk and Technology Review were proposed on December 28, 2016 and promulgated on October 16, 2017. This rule applies to facilities where the total hazardous air pollutants (HAP) emitted are either greater than or equal to 10 tons per year of any single HAP, or where the total HAP emitted are either greater than or equal to 25 tons per year of any combination of HAP. The Nutritional Yeast NESHAP sets emission limits for fermenter operations at nutritional yeast manufacturing facilities. This information is being collected to assure compliance with 40 CFR part 63, subpart CCCC. This ICR renewal reflects changes in burden following implementation of the 2017 final rule amendments, as these standards have been in effect for more than three years.

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

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.

The "Affected Public" are owners or operators of nutritional yeast manufacturing facilities. The "burden" to the Affected Public may be found at the end of this document in Table 1: Annual Estimated Respondent Burden and Cost – National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (Renewal).

The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Annual Estimated EPA Burden and Cost – National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (Renewal). There are approximately 4 nutritional yeast manufacturing facilities. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facilities 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 4 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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 nutritional yeast manufacturing 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 CCCC.

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 these emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times.

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 continuous emission monitors are properly installed and operated, process controls are used on fermentation units, and the emission standards are being met.

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 CCCC.

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 either 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* (85 FR 28003) on May 12, 2020. 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 4 respondents will be subject to these standards over the three-year period covered by this ICR.

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 these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Bakers Association, at (202) 789-0300, and Red Star Yeast, at (800) 558-7279.

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 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 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 either new or existing major source nutritional yeast manufacturing facilities. This includes, but is not limited to, North American Industry Classification System (NAICS) Code 311999, “All Other Miscellaneous Food Manufacturing.”

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the National Emission Standards for Hazardous Air Pollutants: Nutritional Yeast Manufacturing Residual Risk and Technology Review, 40 CFR part 63, subpart CCCC.

A source must make the following reports:

Reporting

Notification of construction and modification	63.5(d)
Initial notification for sources	63.9(b)-(d)
Performance evaluation plan; notification of performance evaluation; and results of performance evaluation (for facilities that use CEMS to monitor emissions)	63.7(c), 63.8(e) & (f)(4) & (f)(6), 63.9(g), 63.2180(d), 63.2181(a)(1)
Performance test plan; notification of performance test; and results of performance test (for facilities that estimate emissions using brew ethanol monitors)	63.7(b), 63.7(g)(1), 63.9(e), 63.2180(c) & (e), 63.2181(a)(1)
Request for alternative monitoring procedures or alternatives to RATA	63.8(f)(4) and (6)
Notification of compliance status	63.9(h), 63.2180(f)
Semiannual compliance report	63.2181(c)

Notifications	
Each notification and report	§§63.10(b)(2)(xiv), 63.2182(a)(1)

A source must keep the following records:

Recordkeeping	
Records of failures to meet a standard	§63.2182(a)(2)
Performance test and performance evaluation records	§§63.10(b)(2)(viii) - (ix), 63.2182(a)(3)
Records of the calculation of brew-to-exhaust correlations	§63.2182(b)
Monitoring records (from CEMS and brew ethanol monitors)	§§63.8(d)(3), 63.10(b)(2)(vi) & (x)-(xi), 63.2182(c)

Recordkeeping	
Continuous compliance data and calculations	§63.2182(d)
Fermentation and batch data	§63.2182(e)
Retention of records	§§63.10(b)(1), 63.2183

Electronic Reporting

The October 16, 2017 final rule amendments to 40 CFR 63, Subpart CCCC require electronic reporting of performance test results. Per 40 CFR 63.2235(b)(1)(i), for data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (*https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert*), respondents must submit the results of the performance test to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX (https://cdx.epa.gov/)).

Additionally, 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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CEMS.
Perform initial performance test 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.

Respondent Activities
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. 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.

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 are no small entities (i.e., small businesses) affected by this regulation.

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 Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for both 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 1,410 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, 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	$148.45 ($70.69 + 110%)
Technical	$121.46 ($57.84 + 110%)

Clerical $60.23 ($28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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 these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) 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)
VOC CEMS[a]	$86,700	0	$0	$186,860	4	$747,440
CEMS RATA[b]	$0	0	$0	$21,216	1.33	$28,217
Brew Ethanol Correlation[c]	$0	0	$0	$19,500	$0	$0
Total			$0			$776,000

[a] Assumes all facilities have installed CEMS to comply with the rule. Annual costs include operation, maintenance, and repair of CEMS.
[b] Assumes an annual O&M cost of $3,624 to conduct RATA per CEMS and an average of 6.5 CEMs per facility. Assumes 4 respondents will complete over 12 quarters or 3 years for average of 1.33 respondents/year.
[c] Assumes no facilities will conduct brew ethanol correlation.
Note: 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 $776,000. 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 $776,000. These are the 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 $2,080.

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

Managerial	$68.37 (GS-13, Step 5, $42.73 + 60%)
Technical	$50.72 (GS-12, Step 1, $31.70 + 60%)
Clerical	$27.46 (GS-6, Step 3, $17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 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 Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (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 4 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 4 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		
	(A)	(B)	(C)	(D)	(E)

Number of Respondents					
Year	Number of New Respondents [1]	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	0	4	0	0	4
2	0	4	0	0	4
3	0	4	0	0	4
Average					4

[1] 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 4.

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 Performance Evaluation	4	1	N/A	4
Performance Evaluation Report	4	1	N/A	4
Notification of Performance Test	4	1	N/A	4
Notification of Compliance Status	4	1	N/A	4
Semiannual Report	4	2	N/A	8
			Total	24

The number of Total Annual Responses is 24.

The total annual labor costs are $165,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,410 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (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 59 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $776,000. 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 42 labor hours at a cost of $2,080; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Nutritional Yeast Manufacturing Residual Risk and Technology Review (40 CFR part 63, subpart CCCC) (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 an increase in burden from the most-recently approved ICR due to an adjustment. The change in the burden and cost estimates occurred because these standards have been in effect for more than three years and the requirements are different during initial

compliance as compared to on-going compliance. The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities following the October 1, 2017, final rule amendments. This includes purchasing monitoring equipment, conducting performance tests, and establishing recordkeeping systems. This ICR removes costs associated with initial compliance, including capital costs. This ICR instead reflects the on-going burden and costs for existing facilities. The adjustment increase in 'burden' is due to an adjustment to the number of facilities conducting performance evaluations to reflect an annual average basis. This ICR reflects the burden for four facilities to conduct a performance evaluation at least once every twelve calendar quarters or three years. There is an additional increase in the labor burden in this ICR, compared to the previous ICR, due to the increase in labor costs over the past three years. Finally, this ICR more accurately reflects the average hours per response, based on the total burden hours divided by the total number of responses submitted by respondents. The previous ICR incorrectly allocated the total burden hours divided by the total number of respondents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 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-2020-0212. 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-2020-0212 and OMB Control Number 2060-0719 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 Manufacturing of Nutritional Yeast (40 CFR Part 63, CCCC) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Non-Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Technical Hours per Respondent Per Year (A x C)	(E) Number of Respondents Per Year	(F) Technical Hours per Year (D x E)	(G) Clerical Hours per Year (F x 0.1)	(H) Management Hours per Year (F x .05)	(I) Total Labor Costs Per Year [b]
1. Applications	NA								
2. Surveys and Studies	NA								
3. Reporting Requirements									
A. Familiarization with the regulatory requirements [a]	15	$0	1	15	4	60	6	3	$8,094
B. Required Activities									
1. VOC CEMS [c]									
a. Capital Cost	0	$86,770	1	0	0	0	0	0	$0
b. Annualized Cost [d]	0	$186,860	1	0	4	0	0	0	$0
2. Performance evaluation [e]	8	$0	1	8	1.33	10.64	1	1	$1,435
a. CEMS RATA [f]	0	$3,264	6.5	0	1.33	0	0	0	$0
3. Brew Ethanol Correlation	10	$6,500	3	30	0	0	0	0	$0
C. Create Information	Inc. in 3B								
D. Gather Information	Inc. in 3E								
E. Report Preparation									
1. Develop Performance Evaluation Plan	15	$0	1	15	0	0	0	0	$0
2. Notification of Performance Evaluation	2	$0	1	2	1.33	2.66	0	0	$359
3. Performance Evaluation Report	2	$0	1	2	1.33	2.66	0	0	$359
4. Notification of Performance Test	2	$0	1	2	0	0	0	0	$0
5. Notification of Compliance Status	4	$0	1	4	0	0	0	0	$0
6. Semiannual Compliance Report	4	$0	2	8	4	32	3	2	$4,317
Subtotal for Reporting Requirements						124			$14,564

4. Recordkeeping Requirements									
A. Read Instructions	Inc. in 3.A								
B. Implement Activities	NA								
C. Develop Record System	NA								
1. Compliance Calculation Tracking	20	$0	1	20	0	0	0	0	$0
D. Record information									
1. Performance Evaluations	2	$0	1	2	1.33	2.66	0	0	$359
2. CEMS Measurements	0.5	$0	350	175	4	700	70	35	$94,434
3. Compliance Calculation	4	$0	12	48	4	192	19	10	$25,902
4. CEMS Calibration and Maintenance	Inc. in 3.B.1.b								
5. Store, File, and Maintain Records	12	$0	1	12	4	48	5	2	$6,475
6. Retrieve Records/Reports	20	$0	1	20	4	80	8	4	$10,792
E. Personnel Training									
1. Acquisition, Installation, & Training	20	$0	1	20	4	80	8	4	$10,792
2. CEMS Inspection and Monitoring	4	$0	1	4	4	16	2	1	$2,158
F. Time for Audits	NA								
Subtotal for Recordkeeping Requirements						1,286			$137,962
TOTAL LABOR BURDEN AND COSTS (rounded) [g]						1,410			$165,000
TOTAL CAPITAL AND O&M COST (rounded) [g]									$776,000
GRAND TOTAL (rounded) [g]									$941,000

Assumptions:

[a] We have assumed that all of the respondents will familiarize with the regulatory requirements each year.

[b] This ICR uses the following labor rates: $148.45 per hour for Executive, Administrative, and Managerial labor; $121.46 per hour for Technical labor, and $60.23 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, 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] All facilities must use VOC CEMS.

[d] Annualized cost equals the average of all facility annualized costs (based on number of fermenters). Includes operation, maintenance, and repairs of CEMS.

[e] Labor hours to conduct performance evaluation of CEMS. Assumes 4 respondents will complete over 12 quarters or 3 years for average of 1.33/year.
[f] Line item for annual non-labor cost to conduct RATA. Number of occurrences per respondent equals the average number of CEMS (i.e., fermenters) per facility. Assumes 4 sources will complete over 12 quarters or 3 years for average of 1.33/year.
[g] 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 Manufacturing of Nutritional Yeast (40 CFR Part 63, CCCC) (Renewal)

Burden Item	(A) Number of Occurrences Per Year [a]	(B) Technical Hours Per Occurrence	(C) Tech Hours Per Year (C=A x B)	(D) Management Hours Per Year (D = C x 0.05)	(E) Clerical Hours Per Year (E = C x 0.1)	(F) Total Hours Per Year (C+D+E)	(G) Total Cost Per Year [c]
1. Applications	not applicable						
2. Familiarization with the regulatory requirements	0	20	0	0	0	0	$0
3. Required Activities							
A. Observe stack tests	0	16	0	0	0	0	$0
B. Excess emissions -- Enforcement Activities [b]	0	24	0	0	0	0	$0
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1. Review performance evaluation plans	0	10	0	0	0	0	$0
2. Review performance evaluation reports	1.33	5	7	0	1	8	$378
3. Review performance test reports	0	5	0	0	0	0	$0
4. Review compliance reports	4	5	20	1	2	23	$1,138
F. Prepare annual summary report	1	10	10	1	1	12	$569
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * $75 per diem) + ($600 per round trip) =				$0	per trip		$0
TOTAL (rounded) [d]						**42**	**$2,080**

Assumptions:

[a] Number of occurrences is the number of states where affected sources will exist and each EPA Region (3 states + 3 EPA regions = 6 respondents).

[b] Assume 1 of the facilities will exceed emissions in year 2.

[c] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $68.37 for Managerial (GS-13, Step 5, $42.73 x 1.6), $50.72 for Technical (GS-12, Step 1, $31.70 x 1.6), and $27.46 for Clerical (GS-6, Step 3, $17.16 x 1.6). These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

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