records of operating parameters and calculations/record of conversion factors

The following is a breakdown of burden used in the ICR. The estimated burden is calculated as two hours for respondents to write the reports for; notification of construction or reconstruction, notification of physical or operation changes, notification of anticipated startup, notification of actual startup, notification of initial performance test, notification of demonstration of CMS. The ICR uses 300 burden hours for the initial performance test. It is assumed that 20% of all affected facilities will have to repeat performance tests. The ICR uses four hours for performing the Reference Method 9 Test. It is estimated that performance of Reference Method 9 Test will occur 1.2 times per facility a year. The ICR uses 40 hours to write an excess emission reports—it is assumed this will take place twice a year.

The recordkeeping burden is estimated to be 0.25 hours to enter information regarding records of operating parameters. It is assumed this will take place 350 times a year per facility. The burden to enter information regarding calculation/record of conversion factors is 0.5 hours. It is assumed this will take place 1,050 times a year per facility.

NSPS Subpart VV Supplementary Information

Affected entities: Entities potentially affected by this action are those which are subject to Subpart VV, VOC Equipment Leaks in the Synthetic Organic Chemicals Manufacturing Industry with the exceptions listed in 40 CFR Part 60.480(d).

*Title:* NSPS Subpart VV, VOC Equipment Leaks in the SOCMI, OMB number 2060–0012, expires May 31, 1996.

Abstract: This ICR contains recordkeeping and reporting requirements that are mandatory for compliance with 40 CFR Part 60.480, Subpart VV, VOC Equipment Leaks in the SOCMI. This information is used by the Agency to identify sources subject to the standards and to insure that the best demonstrated technology is being properly applied. The standards require periodic recordkeeping to document process information relating to the sources ability to identify and eliminate leaking equipment. The standards apply to specific pieces of equipment contained within a process unit in the SOCMI, including pumps in light liquid service, compressors, pressure relief devices in gas/vapor, light or heavy liquid service, sampling connection

systems, open-ended valves or lines, valves in gas/vapor and light liquid service, pumps and valves in heavy liquid service, and flanges and other connectors.

In the Administrator's judgement, VOC emissions from equipment leaks in the SOCMI cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, New Source Performance Standards have been promulgated for this source category as required under section 11 of the Clean Air Act.

The owners or operators of the affected facilities described must make the following one time only reports: notification of the date of construction or reconstruction, notification of the anticipated and actual date of startup, notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which the standard applies (in this case, VOC), notification of the initial performance test, and the results of the performance test. The only regular report required by this Subpart is a semiannual excess emissions summary.

Owners or operator 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 malfunctions of the air pollution control device. These notifications, reports and records are required, in general, of all sources subject to the NSPS.

Recordkeeping requirements specific to equipment leaks in the SOCMI support the facility's leak detection and repair program and include identification of leaking equipment; a log of leaking equipment; a log of information relating to the closed vent systems and control devices; a log identifying all equipment subject to the standards; a log of valves designated as difficult-to-monitor or unsafe-tomonitor; a log of valves complying with skip period leak detection and repair alternative standard; a log of criterion established which indicates a failure of the seal system, barrier system, or both for each barrier fluid system; dates of compliance tests and results; and for determining exemptions, an analysis of design capacity of affected sources or demonstration that the equipment is not in VOC service and a statement listing the feed or raw materials and products.

Reporting requirements specific to equipment leaks in the SOCMI consist of an initial semiannual report including process unit identification and number of valves, pumps and compressors subject to the standards.

All semiannual reports are to include process unit identification, number of components leaking and not repaired, dates of process unit shutdowns, and revisions to items submitted in initial semiannual report. The source is also required to notify the Administrator of the election to use an alternative standard for valves ninety days before implementing the provision.

An 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. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9.

The EPA would like to solicit comments to:

- (i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
- (ii) evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- (iii) enhance the quality, utility, and clarity of the information to be collected; and
- (iv) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Burden Statement: The Agency computed the burden for each of the recordkeeping and reporting requirements applicable to the industry for the currently approved ICR. Where appropriate, the Agency identified specific tasks and made assumptions, while being consistent with the concept of burden under the Paperwork Reduction Act.

The estimate was based on the assumption that there would be 166 new affected facilities each year and that there would be an annual average of 1909 affected facilities over each of the next three years covered by the ICR. For the new sources, it was estimated that it would take: 166 person hours to read the instructions, 9562 person hours to conduct the initial performance tests (assuming that 20% of the tests must be repeated), and 1394 person hours to gather the information and write the initial reports. For all sources, it was estimated that it would take: 15,272 person hours to fill out semiannual reports and 152,720 person hours to