

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS/NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS/NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN)

1(b) Short Characterization/Abstract

This Information Collection Request (ICR) includes two Clean Air Act standards for the wool fiberglass manufacturing industry. Both the New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) standards include basic recordkeeping and reporting, including initial notifications, performance testing, semiannual excess emission reports, and occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility. All reports are sent to the delegated state, or local authority. In the event that there is no such authority, the reports are sent directly to the EPA regional office.

The NSPS for the regulations published at 40 CFR part 60, subpart PPP were proposed on February 7, 1984, and promulgated on February 25, 1985. These regulations apply to each rotary spin wool fiberglass insulation manufacturing line, which commenced construction, modification, or reconstruction after February 2, 1984. The purpose of this NSPS is to control the emissions of particulate matter from each rotary spin wool fiberglass insulation manufacturing line. The standards limit particulate emissions to 5.5 kilograms per megagram (11.0 lb./ton) of molten glass used to manufacture the product.

The NESHAP for the regulations published at 40 CFR part 63, subpart NNN were proposed on March 31, 1997, and promulgated on June 14, 1999. These regulations apply to each glass melting furnace located at a wool fiberglass manufacturing plant; each rotary spin (RS) manufacturing line producing building insulation; each new and existing flame attenuation (FA) manufacturing line that produces pipe products; and each new FA manufacturing line that produces heavy density products. Plants that manufacture mineral wool from rock or slag are not subject to the proposed rule, but they are subject to a separate NESHAP standard for mineral wool production. A facility that is determined to be an area source would not be subject to this NESHAP standard. This information is being collected to assure compliance with 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN.

In general, all NSPS and NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected

facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to both the NSPS and NESHAP.

Any owner, or operator subject to the provisions of 40 CFR part 60, subpart PPP shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. Any owner, or operator subject to the provisions of 40 CFR part 63, subpart NNN shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports for both the NSPS and NESHAP are sent to the delegated state, or local authority. In the event that there is no such delegated authority, the reports are sent directly to the appropriate United States Environmental Protection Agency (EPA) regional office.

Approximately 32 sources are currently subject to 40 CFR part 60, subpart PPP. Approximately 29 sources are subject to 40 CFR part 63, subpart NNN. It is estimated that no new sources will become subject to either the NSPS or NESHAP regulation in the next three years. The number of affected sources subject to these regulations was estimated based on information available from the North American Insulation Manufacturing Association (NAIMA).

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

The EPA also 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 (HAPs). 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, or 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, particulate emissions and hazardous air pollutant (HAP) emissions from wool fiberglass manufacturing plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS and NESHAP were promulgated for this source category at 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN, respectively.

2(b) Practical Utility/Users of the Data

The control of emissions of particulates and HAPs from wool fiberglass manufacturing plants requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of particulates from wool fiberglass insulation manufacturing plants are the result of operation of each rotary spin wool fiberglass insulation manufacturing line. Emissions of HAPs from wool fiberglass manufacturing plants are the result of operation of each glass melting furnace and each RS and FA manufacturing line. These standards rely on the capture of particulate and HAPs emissions by control equipment such as a wet scrubbing control device, or an electrostatic precipitator. The notifications required in the applicable regulations 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 and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that plants affected by the NSPS and/or NESHAP continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under both 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated State, or local agency. If a State, or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the State, or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register at 71 FR 35652 on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility System) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 61 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that plants are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and

noncompliance would decrease.

3(e) General Guidelines

None of these reporting, or recordkeeping requirements violates any of the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined not to be confidential. However, 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 (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contains sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements for 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN are wool fiberglass manufacturing plants.¹ The SIC code for the respondents affected by the standards is SIC (United States Standard Industrial Classification) 3296, which corresponds to the NAICS (The North American Industry Classification System) 327993.

4(b) Information Requested

(i) Data Items

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the part 70 permit program and the five year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

¹ 40 CFR part 63, subpart NNN also includes plants that manufacture fiberglass for liquid and air filtration. However, the majority of the plants (~90%) manufacture fiberglass for building insulation.

All data in this ICR that is recorded and/or reported is required by 40 CFR part 60, subpart PPP and/or 40 CFR part 63, subpart NNN. A source subject to 40 CFR part 60, subpart PPP and/or 40 CFR part 63, subpart NNN must comply with the notifications, monitoring and recordkeeping requirements listed in the following exhibits.

Reports for 40 CFR part 60, subpart PPP	
Construction/reconstruction	60.7(a)(1)
Actual startup	60.7(a)(3)
Initial performance test	60.8(d)
Physical or operational change	60.7(a)(4)
Initial performance test results	60.8(a)
Semiannual reports of exceedances of control device operating parameters	60.684(d)

Reports for 40 CFR part 63, subpart NNN	
Applicability	63.9(a), 63.1389(a)(1-3)
Construction/reconstruction	63.9(b)(3) and (4), 63.1389(a)(4)
Actual startup	63.9(b)(2) and (4)
Special compliance requirements	63.9(d), 63.1389(a)(5)
Initial performance test	63.9(e), 63.1389(a)(6)
Continuous monitoring system notifications	63.9(g)
Compliance status	63.9(h), 63.1389(a)(7)
Request for extension of compliance, adjustments to time periods, and changes in information	63.9(c), (i) and (j), 63.43
Operations, maintenance, and monitoring plan	63.6(e)(1)-(e)(2), 63.1383(a)
Report of performance test results	63.10(d)(2), 63.1386(b)
Startup, shutdown, and malfunction plans and reports	63.6(e)(3), 63.10(d)(5), 63.1386(c)
Excess emissions	63.1386(e)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart PPP	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)

Recordkeeping for 40 CFR part 60, subpart PPP	
Records are required to be retained for two years.	60.7(f)
Continuous measurements of control device operating parameters	60.684(d)

Recordkeeping for 40 CFR part 63, subpart NNN	
General recordkeeping requirements (e.g., startups, shutdowns, and malfunctions including process equipment, air pollution control equipment, maintenance performed, and actions taken outside the scope of the existing plans)	63.10(b)(2), 63.1386(d)
Continuous measurements of control device operating parameters: <ul style="list-style-type: none"> - Bag leak detection system alarms - ESP parameter values used to measure performance - Air temperature above the molten glass in a cold top furnace - Uncontrolled glass-melting furnace parameter values to measure performance - The formulation of each binder patch and the LOI and density for each product manufactured - Process parameter levels for RS and FA manufacturing lines that use process modifications to comply with the emission limits - Scrubber pressure drop, scrubbing liquid flow rate, and any chemical additive - Incinerator operating temperature and the results from periodic inspection of incinerator components - Glass pull rate 	63.1386(d)(2)(i-ix)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous monitoring system for 40 CFR part 63, subpart NNN sources. Install, calibrate, maintain, and operate CMS for pressure drop and liquid supply pressure for wet scrubber for 40 CFR part 60, subpart PPP sources.
Perform initial performance test. Methods 1-5, 316 or 318, method for determining LOI, method for determining free-formaldehyde content of resin, and method for the determination of product density are used for 40 CFR part 63, subpart NNN sources. Reference Method 5E for particulates is used 40 CFR part 60, subpart PPP sources. All tests are repeated if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

Respondent Activities
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the Air Facility System (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 100,000 industrial and government-owned plants. EPA uses the AFS 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 40 CFR part 60, subpart PPP must be retained by the owner or operator for two years. The records required by 40 CFR part 63, subpart NNN must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

There are no small businesses affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Average Annual Burden of Reporting and Recordkeeping Requirements, NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP) and Table 2: Average Annual Burden of Reporting and Recordkeeping Requirements, NESHAP for Wool Fiberglass Manufacturing Plants (40 CFR part 63, subpart NNN).

6. Estimating the Burden and Cost of the Collection

Tables 1 and 2 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subparts 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. Responses to this information collection are mandatory. The Agency may not conduct, or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements for the 40 CFR part 60, subpart PPP is estimated to be 2,288 hours. The average annual burden to industry over the next three years from these recordkeeping and reporting requirements for the 40 CFR part 63, subpart NNN is estimated to be 15,928 hours. The total number of labor hours for both subparts is 18,216. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS and NESHAP programs, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates: \$89.94 per hour for Executive, Administrative, and Managerial labor; \$61.66 per hour for Technical labor, and \$38.39 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September, 2002, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

Managerial	\$89.94	(\$42.83 + 110%)
Technical	\$61.66	(\$29.36 + 110%)
Clerical	\$38.39	(\$18.28 + 110%)

For 40 CFR part 63, subpart NNN, managerial and administrative labor hours were estimated to be approximately 5% and 10% of the estimated technical labors respectively. For 40 CFR part 60, subpart PPP, only technical hours are used to satisfy the recordkeeping and reporting requirements since this standard is older and the ICR is more simplistic.

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

The capital startup costs and operations and maintenance (O&M) costs for 40 CFR part 60, subpart PPP are associated with the particulate matter monitoring equipments. The capital startup costs are one-time costs when the facility becomes subject to the standard. Because no new sources are anticipated for this source category over the next three years, the capital startup costs are zero. The annual O&M costs associated with the particulate monitoring equipment are \$16,500.

The capital and O&M costs for 40 CFR part 63, subpart NNN are associated with baghouse leak detection monitoring, furnace temperature monitoring, and formaldehyde emission monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the standard. Because no new sources are anticipated for this source category over the next three years, the capital startup costs are zero. O&M costs for baghouse leak detection monitoring are estimated at \$500 per year per baghouse. There are no O&M costs associated with furnace temperature monitors or formaldehyde emissions monitoring.

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

NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP)						
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)
Particulate Matter Monitoring	\$15,000	0	\$0	\$16,500	29	\$478,500

NESHAP for Wool Fiberglass Manufacturing Plants (40 CFR part 63, subpart NNN)						
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 ²	(G) Total O&M, (E X F)
Baghouse Leak Detection	\$9,100	0	0	\$500	20	\$10,000
Furnace Temperature Monitoring	\$1,500	0	0	\$0	15	\$0
Formaldehyde Emission Monitoring	\$15,000	0	0	\$0	50	\$0

Because there are no new sources expected over the next three years, there are no capital costs associated with either 40 CFR part 60, subpart PPP, or 40 CFR part 63, subpart NNN.

The total operation and maintenance (O&M) costs for this ICR are \$488,500. This is the sum of the totals of column G in the two tables above.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR are estimated to be \$488,500.

6(c) Estimating Agency Burden and Cost

² In order to calculate O&M costs for 40 CFR part 63, subpart PPP, the estimates provided in column F were not based on the number of respondents but instead on the total number continuous monitoring devices that exist within the industry. For example, we estimate that there are 20 baghouses used within the wool fiberglass manufacturing industry. Some respondents may have more than one baghouse located at their facility.

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR for 40 CFR part 60, subpart PPP is estimated to be \$5,055. The average annual Agency cost during the three years of the ICR for 40 CFR part 63, subpart NNN is estimated to be \$19,523. This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$39.49. These rates are from the Office of Personnel Management (OPM) "2003 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Tables 3: Average Annual EPA Resource Requirement, NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP) and Table 4: NESHAP for Wool Fiberglass Manufacturing Plants (40 CFR part 63, subpart NNN). For 40 CFR part 63, subpart NNN, managerial and administrative labor hours were estimated to be approximately 5% and 10% of the estimated technical labors respectively.

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

Approximately 32 and 29 sources currently are subject to 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN, respectively. We estimate that no additional sources per year will become subject to either regulation in the next three years.

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(CxD)+F
40 CFR part 60, subpart PPP	0	5	32	2	0	64
40 CFR part 63, subpart NNN	0	8	29	4	0	116

The number of total respondents for 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN is 61. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses for both 40 CFR part 60, subpart PPP and 40 CFR part 63, subpart NNN is 180. This is the number in column E of the Respondent Universe and Number of Responses Per Year table above.

The total annual labor costs for 40 CFR part 60, subpart PPP is \$141,078. The total annual labor costs for 40 CFR part 63, subpart NNN is \$969,473. The total annual labor costs for both standards are equal to \$1,110,551. Details upon which this estimate is based appear in Table 1: Annual Respondent Burden and Cost, NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR part 60, subpart PPP) and Table 2: Annual Respondent Burden and Cost, NESHAP for Wool Fiberglass Manufacturing Plants (40 CFR part 63, subpart NNN).

Note that the total annual capital and O&M costs to the regulated entity are \$488,500. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents appear in the attached tables 1 thru 4. A summary of the bottom line burden hours and cost appears below.

	Industry Burden		Agency Burden		Capital Costs	O&M Costs
	Hours	Dollars	Hours	Dollars	Dollars	Dollars
40 CFR Part 60, Subpart PPP	2,288	141,078	128	5,055	0	478,500
40 CFR Part 63, Subpart NNN	15,928	969,473	507	19,523	0	10,000
Total	18,216	1,110,551	635	24,578	0	488,500

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 101 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to, or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and

verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit, or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2006-0420. 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 also are available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0420 and OMB Control Number 2060-0114 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 BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS NSPS FOR WOOL FIBERGLASS INSULATION MANUFACTURING (40 CFR PART 60, SUBPART PPP)

REPORTING/RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/ Year (B)	Hours/Year (C=A*B) (C)	Respondents/ Year (D)	Hours/ (E=C*(D)) (E)
1. APPLICATIONS	N/A	N/A	N/A	N/A	
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	
3. REPORTING REQUIREMENTS					
a. Read Instructions	1	1	1	0	
b. Required Activities					
Initial Performance Tests	72	1	72	0	
Repeat of Performance Tests	72	0.2	14.4	0	
c. Create Information		-----Included in 3b-----			
d. Gather Existing Information		-----Included in 3b-----			
e. Write Report					
Notification of Construction/Reconstruction	2	1	2	0	
Notification of Actual Startup	2	1	2	0	
Notification of Physical or Operational Change	2	1	2	0	
Notification of Initial Performance Test	2	1	2	0	
Report of Performance Test		-----Included in 3b-----			
Semiannual Exceedance Report	4	2	8	32	
4. RECORDKEEPING REQUIREMENTS					
a. Read Instructions		-----Included in 3a-----			
b. Plan Activities		-----Included in 3b-----			
c. Implement Activities		-----Included in 3b-----			
d. Develop Record System	N/A	N/A	N/A	N/A	

e. Time to Enter Information					
Record of Operating Parameters and Emissions	0.25	250	62.5	32	
Records of Startups, Shutdowns, Malfunctions	1	1	1	32	
f. Train Personnel	N/A	N/A	N/A	N/A	
g. Audits	N/A	N/A	N/A	N/A	
TOTAL ANNUAL BURDEN					

Assumptions	
Number of affected facilities	32
Number of new facilities (per year)	0
Time required to read instructions (hours)	1
Time required to complete performance test (hours)	72
Rate of failed performance tests	20%
Time required to prepare semiannual report (hours)	4
Time required to record operating parameters (hours)	0.25
Number of days operating per year	250
Time required to record startups, shutdowns, malfunctions etc. (hours)	1
Number of startups, shutdowns, malfunctions, etc. (per year)	1
Time required for notification preparation (hours)	2
Technical labor rate	\$61.66

TABLE**2:**

**ANNUAL BURDEN OF REPORTING AND RECORDKEEPING REQUIREMENTS
 NESHP FOR WOOL FIBERGLASS MANUFACTURING PLANTS (40 CFR PART 63, SUBPART NNN)**

REPORTING/RECORDKEEPING REQUIREMENTS	Hours/ Occurrence (A)	Occurrences/Year (B)	Hours/Yr (C=A*B) (C)	Resppts/Year (D)	Te Ho
1. APPLICATIONS	N/A	N/A	N/A	N/A	
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	
3. REPORTING REQUIREMENTS					
a. Read Instructions	1	1	1	0	
b. Required Activities					
Initial Performance Tests	980	1	980	0	
Repeat of Performance Tests	980	0.2	196	0	
Operations, Maintenance, Monitoring Plan	40	1	40	0	
Startup, Shutdown, and Malfunction Plan	40	1	40	0	
c. Create Information		-----Included in 3b-----			
d. Gather Existing Information		-----Included in 3b-----			
e. Write Report					
Notification of Applicability	2	1	2	0	
Notification of Construction/Reconstruction	2	1	2	0	
Notification of Actual Startup	2	1	2	0	
Notification of Special Compliance Requirements	2	1	2	0	
Notification of Initial Performance Test	2	1	2	0	
Notification of Compliance Status	2	1	2	0	
Request for Extension of Compliance, Adjustments to Time Periods, and Changes in Information	2	1	2	0	
Report of Performance Test		-----Included in 3b-----			
Excess Emissions Report	16	2	32	5.8	
Report of No Excess Emissions	1	2	2	23.2	
Quality Improvement Plan	40	1	40	0	
Startup, Shutdown, and Malfunction Report	8	2	16	2.9	
4. RECORDKEEPING REQUIREMENTS					

a. Read Instructions		-----Included in 3a-----			
b. Plan Activities		-----Included in 3b-----			
c. Implement Activities		-----Included in 3b-----			
d. Develop Record System	N/A		N/A	N/A	N/A

REPORTING/RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/Year (B)	Hours/ Year (C=A*B) (C)	Respondents/ Year (D)	Te Ho
e. Time to Enter Information					
Record of Operating Parameters and Emissions	9	52	468	29	
f. Train Personnel	N/A	N/A	N/A	N/A	
g. Audits	N/A	N/A	N/A	N/A	
TOTAL ANNUAL BURDEN					

Assumptions	
Number of affected plants	29
Number of new plants (per year)	0
Time required to read instructions (hours)	1
Time required to complete performance test (hours)	980
Rate of failed performance tests	20%
Time required to prepare the Operation, Maintain, Monitoring Plan (hours)	40
Time required to prepare the Startup, Shutdown, and Malfunction Plan (hours)	40
Time required to prepare the Quality Improvement Plan (hours)	40
Time required to record info required by standard (hours/week)	9

Percent of plants required to submit startup, shutdown, malfunction reports (per year)	10%
Time required to prepare the Excess Emission Reports (hours)	16
Percent of plants preparing Excess Emissions Reports	20%
Time required to prepare No Excess Emissions Reports (hours)	1
Percent of plants preparing No Excess Emissions Reports	80%
Time required for Startup, Shutdown, and Malfunction Reports	8
Estimated number of requests for extension/adjustments to time periods/changes in info (hours)	1
Time required for notification preparation/requests for extensions/adjustments to time periods/changes in info(hours)	2
Management labor rate	\$89.94
Technical labor rate	\$61.66
Administrative labor rate	\$38.39

TABLE 3: AVERAGE ANNUAL EPA RESOURCE REQUIREMENT NSPS FOR WOOL FIBERGLASS INSULATION MANUFACTURING (40 CFR PART 60, SUBPART PPP)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (A)	Occurrences/Plant/Year (B)	EPA Hours/Year (C=A*B) (C)	Plants/Year (D)	EPA Hours/Year (E=C*D) (E)
INITIAL PERFORMANCE TESTS					
New or Modified Facility	24	1	24	0	0
REPEAT PERFORMANCE TEST					
New or Modified Facility	24	0.2	4.8	0	0
REPORT REVIEW					

New or Modified Facility					
Notification of Construction/Reconstruction	2	1	2	0	0
Notification of Actual Startup	1	1	1	0	0
Notification of Physical or Operational Change	2	1	2	0	0
Notification of Initial Performance Test	1	1.2	1.2	0	0
Review Performance Test Results	8	1.2	9.6	0	0
Review Semiannual Exceedance/No Exceedance Reports	2	2	4	32	128
TOTAL ANNUAL HOURS					128
TOTAL ANNUAL BURDEN	\$5,055				

(rounded)

Assumptions	
Number of new plants	0
Number of existing plants	32
Rate of failed performance tests	20%
Time required to participate with performance test (per plant)	24
Time required to review construction notification (hours)	2
Time required to review startup and initial test notifications (hours)	1
Time required to review performance test results (hours)	8
Time required to review existing plant emission reports (hours)	2
EPA labor rate	\$39.49
Percentage of new plant visits	100%

TABLE 4:

**AVERAGE ANNUAL EPA RESOURCE
REQUIREMENT**

NESHAP FOR WOOL FIBERGLASS MANUFACTURING PLANTS (40 CFR PART 63, SUBPART NNN)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/ Occurrence (A)	Occurrences / Plant/Year (B)	EPA Hours/ Year (C=A*B) (C)	Plants/ Year (D)	Technical Hours/Year (E)	Management Hours/Year (E*0.05)
INITIAL PERFORMANCE TESTS						
New or Modified Facility	40	1	40	0	0	0
REPEAT PERFORMANCE TEST						
New or Modified Facility	40	0.2	8	0	0	0
REPORT REVIEW						
New or Modified Facility						
Notification of Applicability	2	1	2	0	0	0
Notification of Construction/Reconstruction	2	1	2	0	0	0
Notification of Actual Startup	2	1	2	0	0	0
Notification of Special Compliance Requirements	1	1	1	0	0	0
Notification of Initial Performance Test	2	1	2	0	0	0
Notification of Compliance Status	2	1	2	0	0	0
Request for Extension of Compliance, Adjustments to Time Periods, and Changes in Information	2	1	2	0	0	0
Quality Improvement Plan	40	1	40	0	0	0
Operations Maintenance and Monitoring Plan	40	1	40	0	0	0
Startup, Shutdown, and Malfunction Plan	40	1	40	0	0	0
Report of Performance Test	40	1	40	0	0	0
Excess Emissions Reports	20	2	40	5.8	232	11.6
Report of No Excess Emissions	2	2	4	23.2	92.8	4.64
Startup, Shutdown, and Malfunction Reports	20	2	40	2.9	116	5.8
TOTAL ANNUAL HOURS					440.8	22.04
TOTAL ANNUAL BURDEN						
	\$19,523	(rounded)				

Assumptions	
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Number of new plants	0
Number of existing plants	29
Rate of failed performance tests	20%
Time required to participate with performance test (per plant)	40
Time require to review notifications (hours)	2
Time required to review plans (hours)	40
Time required to review performance test results (hours)	40
Time required to review reports (e.g., excess emissions, startup, shutdown, and malfunctions) (hours)	20
Percent of plants required to submit startup, shutdown, and malfunction reports (per year)	10%
Percent of facilities required to prepare excess emissions reports	20%
Percent of facilities required to prepare no excess emissions reports	80%
Estimated number of extensions, adjustments to time periods, etc. (per year)	1
EPA management labor rate	\$53.22
EPA technical labor rate	\$39.49
EPA administrative labor rate	\$21.38