

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal)

**1(b) Short Characterization/Abstract**

The NESHAP regulations published at 40 CFR part 63, subpart DDD were proposed on May 8, 1997, and promulgated on June 1, 1999. These regulations apply to each cupola and/or curing oven located at a mineral wool production facility commencing construction or reconstruction after the date of proposal. This information is being collected to assure compliance with part 63, subpart DDD.

In general, all 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 NESHAP.

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

Approximately 12 sources are currently subject to the regulation, and it is estimated that there will be no additional sources subject to the regulation in the next three years. It is further assumed that there are a total of approximately 18 cupolas operating at these 12 sources. This information was provided by the North American Insulation Manufacturing Association (NAIMA). All but two of the 12 sources are members of NAIMA.

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

There are twelve mineral wool production facilities with approximately eighteen cupolas in the United States, which are all publicly owned and operated by the mineral wool industry. None of the twelve facilities in the United States are owned by either state, local, tribal or the Federal Government.

## **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 (HAPs). These standards are applicable to new or existing sources of HAPs 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, particulates and formaldehyde emissions from the production of mineral wool cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart DDD.

### **2(b) Practical Utility/Users of the Data**

The control of particulates and formaldehyde emissions from mineral wool production facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of particulates and formaldehyde emissions from Mineral Wool Production are the result of operation of the cupola and curing ovens. This standard relies on a fabric filter for particulate emission control for cupolas and a thermal incinerator for formaldehyde control for curing ovens.

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, that leaks are being detected and repaired, and that the regulations are being met. 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 requirement described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP

continue to operate the control equipment in 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 40 CFR part 63, subpart DDD.

#### **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 their 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 (71 FR 58853) on October 5, 2006. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

In estimating the affected number of sources and the growth rate of mineral wool production facilities subject to this standard, EPA contacted Angus Crane of the North American Insulation Manufacturers Association (NAIMA) at (703) 684-0084. All but two of the 12 mineral production facilities subject to this standard are members of NAIMA. Therefore, NAIMA was able to provide us with accurate estimates regarding the number of existing facilities. NAIMA indicated that there are currently 12 mineral wool production plants located in the United States. There is a total approximately 18 affected units (e.g., cupolas<sup>1</sup>) located at these plants. Due to increased competition from the cellulose insulation manufacturing industry, particularly in the mobile home production sector, NAIMA estimates that there will be no growth in the mineral wool production industry over the next three years.

#### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that

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<sup>1</sup> This standard applies to cupolas and curing ovens located at mineral wool production facilities. However, for this ICR it is assumed that no additional equipment is needed to meet the monitoring requirements for the curing ovens. Therefore, capital costs and operation and maintenance (O&M) costs for this ICR are associated only with the cupolas, specifically the capital cost and O&M costs associated with the installation and operation of a baghouse leak detection system.

facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the 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 violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

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.

### **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 contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are mineral wool production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is 3296, which correspond to the North American Industry Classification System (NAICS) code 327993 for mineral wool production facilities.

### **4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

**(i) Data Items**

All data in this ICR that is recorded and/or reported is required by National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production (40 CFR part 63, subpart DDD).

A source must make the following reports:

<b>Reports for 40 CFR part 63, subpart DDD</b>	
Applicability	63.9(a), 63.1191(a)
Construction/reconstruction	63.9(b)(3) and (4), 63.1191(b)
Actual startup	63.9(b)(2) and (4)
Special compliance requirements	63.9(d), 63.1191(c)
Initial performance test	63.9(e), 63.1191(d)
Compliance status	63.9(h), 63.1191(e)
Request for extension of compliance, adjustments to time periods, and changes in information	63.9(c), (i) and (j)
Notification of seal gap measurements	63.697(d)(2)

<b>Reports</b>	
Report of performance test results	63.10(d)(2), 63.1193(a)
Startup, shutdown, and malfunction plans	63.6(c)(3), 63.1193(b)
Startup, shutdown, and malfunction reports	63.6(e)(3), 63.10(d)(5), 63.1191(c)
Operations, maintenance, and monitoring plan	63.6(e)(1)-(e)(2), 63.1193(d)
Semiannual excess emissions report	63.10(e)(3), 63.1193(e)
Semiannual no excess emissions report	63.10(e)(3), 63.1193(f)

A source must keep the following records:

<b>Recordkeeping for 40 CFR part 63, subpart DDD</b>	
Startup, shutdown, malfunctions, including process equipment, air pollution control equipment, maintenance performed, and actions taken outside the cope of existing plans	63.10(b), 63.1192(a)

<b>Recordkeeping for 40 CFR part 63, subpart DDD</b>	
Maintain records of the following information: <ul style="list-style-type: none"> <li>- Cupola production (melt) rate [(Mg/hr) or (tons/hr)]</li> <li>- All bag leak detection system alarms</li> <li>- Free-formaldehyde content of each resin lost and binder formulation</li> <li>- Incinerator operating temperature and results of incinerator inspections</li> </ul>	63.1192(b)
Retain records for five years	63.1192(c)
Retain records on microfilm, on computer, on disks, magnetic take disks, or on microfiche	63.1192(d)
Report information on paper or on a labeled computer disk using available computer software	63.1192(e)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., leaks and spills of mercury. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Write the notifications and reports listed above.
Transmit, or otherwise disclose the information.
Train personnel to able to respond to a collection of information.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Perform initial performance test, Reference Method 1, 2, 3 or 3A, 4, 5, 10, and 318 test, and repeat performance tests if necessary.
Enter information required to be recorded above.
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.

<b>Respondent Activities</b>
All monitoring systems and equipment must be installed, operational, and properly calibrated before the performance test.
Adjust existing ways to comply with any previously applicable instructions and requirements.

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., baghouse leak detection. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

### **5(a) Agency Activities**

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

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, 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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and 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 entered into the 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 facilities. 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 this regulation must be retained by the owner or operator for five

years.

### **5(c) Small Entity Flexibility**

A majority of the affected facilities are primarily small entities (e.g., small businesses). However, the impact on small entities was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the type of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,018 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates: \$93.09 per hour for Executive, Administrative and Managerial labor; \$64.13 per hour for Technical labor, and \$39.65 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, ATable 10. Private industry, by occupational and industry group. The rates are from column 1, ATotal compensation. The rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.



Managerial	\$93.09	(\$44.33 + 110%)
Technical	\$64.13	(\$30.54 + 110%)
Clerical	\$39.65	(\$18.88 + 110%)

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

The types of industry costs associated with the information collection activities in the subject standard 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 monitor 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 <sup>2</sup>	(G) Total O&M, (E X F)
Baghouse Leak Detection	\$14,900	0	\$0	\$500	18	\$9,000

<sup>2</sup> For this table, the number of respondents is the number of cupolas that are required to have leak detection systems instead of their baghouses. It is estimated that there are 18 cupolas located at 12 facilities.

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 \$9,000. 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 \$9,000.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$27,211. This ICR uses the following labor rates:

Managerial	\$53.22	(GS-13, Step 5, \$33.26 x 1.6)
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Technical	\$39.49	(GS-12, Step 1, \$24.68 x 1.6)
Clerical	\$21.38	(GS-6, Step 3, \$13.36 x 1.6)

These rates are from the Office of Personnel Management (OPM) A2003 General Schedule@ which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden and Cost - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD), below.

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

Based on our research for this ICR, there are approximately 12 existing sources currently subject to the standard. It is estimated that no additional sources per year will become subject to the regulation in the next three years.

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

Number of Respondents					
Year	(A) Number of New Respondents	(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	12	0	0	12
2	0	12	0	0	12
3	0	12	0	0	12
Average	0	12	0	0	12

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 12.

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

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)+(Cx D) +F
40 CFR part 63, subpart DDD	0	0	12	2	0	24

The number of total respondents is 12.

The number of Total Annual Responses is 24. This is the number in column E of the Respondent Universe and Number of Responses per Year table above.

The total annual labor costs are \$190,906. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD), below.

#### **6(e) Bottom Line Burden Hours 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, respectively, and summarized below.

#### **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. Second, the growth rate for the industry is very 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 126 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-2006-0721, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Enforcement and Compliance Docket and

Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., N.W., 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1927. An electronic version of the public docket is available online at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0721 and OMB Control Number 2060-0362 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 Mineral Wool Production (40 CFR Part 63, Subpart DDD)**

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions <sup>c</sup>	4	1	4	0	0	0	0	\$0
B. Required activities								
Initial performance test <sup>d</sup>	525	1	525	0	0	0	0	\$0
Repeat performance test <sup>d,e</sup>	525	0.2	105	0	0	0	0	\$0
Operations, maintenance, monitoring plan <sup>f</sup>	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction plan <sup>g</sup>	40	1	40	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write reports								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Excess emissions report <sup>h</sup>	16	2	32	2.4	76.8	3.8	7.7	\$5,584.04
Report of no excess emissions <sup>i</sup>	8	2	16	9.6	153.6	7.7	15.4	\$11,177.39
Quality improvement plan <sup>j</sup>	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction report	8	2	16	0	0	0	0	\$0

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
4. Recordkeeping requirements								
A. Read instructions	4	1	4	4.3	17.2	0.4	1.7	\$1,207.66
B. Plan activities	See 3E							
C. Implement activities	See 3E							
D. Develop record system	See 3E							
E. Time to enter information								
Record of operating parameters and <sup>k</sup> emissions	3.8	52	197.6	12	2,371.2	118.6	237.1	\$172,500.62
F. Time to transmit or disclose information	0.25	2	0.5	12	6.0	0.3	0.6	\$436.48
G. Train personnel	N/A							
H. Time for audits	N/A							
Subtotals Labor Burden and cost					2,624.8	130.8	262.5	\$190,906.19
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						3,018		\$190,906

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be the twelve existing respondents. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$93.04 per hour for Executive, Administrative, and Managerial labor; \$64.13 per hour for Technical labor, and \$39.65 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June, 2003, ATable 2. Civilian Workers, by occupational and industry group. © The rates are from column 1, ATotal compensation. © The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that it will take 4 hours to read instructions.

<sup>d</sup> We have assumed that it will take 525 hours for each respondent to complete performance test based on the following: (2.5 sources per plant x 130 hours per source + 200 hours for calibration, retesting, sample analysis, etc.), for a total of 525 hours.

<sup>e</sup> We have assumed that 20 percent of respondents will have to repeat performance test due to failure.

<sup>f</sup> We have assumed that each respondent will take 40 hours to prepare the operation, maintenance, and monitoring plan.

<sup>g</sup> We have assumed that each respondent will take 40 hours to prepare the startup, shutdown, and malfunction plan.

- <sup>h</sup> We have assumed that 20 percent of respondents will take sixteen hours to write excess emissions report.
- <sup>i</sup> We have assumed that 80 percent of respondents will take eight hours to complete the report for no excess emissions.
- <sup>j</sup> We have assumed that 10 percent of facilities are required to prepare a quality improvement plan.
- <sup>k</sup> We have assumed that each respondent will 3.8 hours to record information, based on the following: (2.5 sources x 1.5 hours per source) for a total of 3.8 hours, 52 times per year.
- <sup>l</sup> We have assumed that it will take each respondent 0.25 hours two times per year to transmit or disclose information.

**Table 2: Average Annual EPA Burden - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Initial performance tests								
New or modified facility	40	1	40	0	0	0	0	\$0
Repeat performance test								
New or modified facility <sup>c</sup>	40	0.2	8	0	0	0	0	\$0
Report Review								
New or modified facility								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	1	1	1	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0	0	0	\$0
Quality improvement plan <sup>d</sup>	40	1	40	0	0	0	0	\$0
Operations, maintenance and monitoring plan	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction <sup>e</sup>	40	1	40	0	0	0	0	\$0
Report of performance test	40	1	40	0	0	0	0	\$0
Excess emissions reports <sup>f</sup>	20	2	80	2.4	96	4.8	9.6	\$4,251.74
Report of no excess emissions <sup>g</sup>	2	2	4	9.6	38.4	1.9	3.8	\$1,700.70
Startup, shutdown, and malfunction <sup>h</sup>	20	2	40	12	480	24	48	\$21,258.72



Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Subtotals Labor Burden and cost					614.4	30.7	61.4	\$27,211.16
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						706.5		\$27,211

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be the twelve existing respondents. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$53.22 (GS-13, Step 5, \$33.26 x 1.6), Technical rate of \$39.49 (GS-12, Step 1, \$24.68 x 1.6), and Clerical rate of \$21.38 (GS-6, Step 3, \$13.36 x 1.6). These rates are from the Office of Personnel Management (OPM) A2003 General Schedule@ which excludes locality rates of pay.

<sup>c</sup> We have assumed that 20 percent of respondents will fail the performance test.

<sup>d</sup> We have assumed that it will take 40 hours for each respondent to review quality improvement plan report.

<sup>e</sup> We have assumed that it will take 40 hours for each respondent to review the startup, shutdown, malfunction plan.

<sup>f</sup> We have assumed that 20 percent of respondents will take twenty hours to review excess emissions report.

<sup>g</sup> We have assumed that 80 percent of respondents will take two hours to it will take each respondent 10 hours to review the plan.

<sup>h</sup> We have assumed that each respondent will take 20 hours to review the startup, shutdown, malfunction report.