

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Rubber Tire Manufacturing

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Rubber Tire Manufacturing , (40 CFR part 60, subpart BBB) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for rubber tire manufacturing plants were proposed on January 20, 1983, and promulgated on September 15, 1987. Minor revisions to the standards of performance for the rubber tire manufacturing industry were proposed on February 14, 1989 and promulgated on September 19, 1989. These standards apply to undertread cementing operations, sidewall cementing operations, tread end cementing operations, bead cementing operations, green tire spraying operations, Michelin-A operations, Michelin-B operations, and Michelin-C automatic operations, commencing construction, modification or reconstruction after January 20, 1993. This information is being collected to assure compliance with 40 CFR part 60, subpart BBB.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. This standard requires performance test of Method 25 and an annual report of Method 24 results to verify VOC content of water-based sprays. 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. Monitoring requirements specific to rubber tire manufacturing plants provide information on the operation of the emissions control device and compliance with the VOCs standards. Semiannual reports of excess emissions are required. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

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 two 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 41 rubber tire manufacturing plants are currently subject to the standard. It is estimated that there will be no industry growth over the next three years. Although some plants may conduct operational changes, these changes will not trigger applicability of this rule. We are also assuming that all plants are now using the water-based sprays that meet the NSPS green tire spray limits without having to use add-on control equipment. These estimates are based on information gathered from EPA's AIRS Facility Subsystem (AFS) database through

the Online Tracking Information System (OTIS); consultation with the Agency's contact for the development of this rule at the Office of Air Quality Planning and Standards (OAQPS); and the review of information available on the active ICR.

The burden to the "Affected Public" (i.e., rubber tire manufacturing plants which are publicly owned) can be found in Table 1; Annual Respondent Burden and Cost: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB). The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors. The burden to the Federal Government can be found in Table 2: Annual Burden and Cost to the Federal/State Government: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB). None of the rubber tire manufacturing plants are owned by either state, local and tribal agencies or the Federal Government.

In the development of this Information Collection Request (ICR), we reviewed the Office of Management and Budget (OMB) "Terms of Clearance" (TOC) section on the active ICR. There were no comments in the TOC section.

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.

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, volatile organic compound (VOC) emissions from rubber tire manufacturing plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart BBB.

2(b) Practical Utility/Users of the Data

The control of VOC emissions from rubber tire manufacturing requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. VOC emissions from rubber tire manufacturing plants are the result of operation of the following affected facilities: undertread cementing operations, sidewall cementing operations, tread end cementing operations, bead cementing operations, green tire spraying operations, Michelin-A operations, Michelin-B operations, and Michelin-C-automatic operations affected facilities. The subject standards are achieved by the reduction of VOC emissions using thermal incinerators, and catalytic incinerators, carbon absorbers and/or other recovery devices.

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. 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 facilities affected by the NSPS 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 60, subpart BBB.

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 (72 FR 10735) on March 9, 2007. 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 (AIRS Facility Subsystem) 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 41 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. 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 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 1320.5.

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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are rubber tire manufacturing plants that commenced construction, modification, or reconstruction after January 20, 1983. The SIC code for the respondents affected by the standards is U.S. Standard Industrial Classification (SIC) 3011 which corresponds to The North American Industry Classification System (NAICS) 326211 for Tire Manufacturing (except Retreading).

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB).

A source must make the following reports:

Reports	
Notification of construction/reconstruction.	60.7(a)(1)
Notification of anticipated startup.	60.7(a)(2)
Notification of actual startup.	60.7(a)(3)
Initial performance test results.	60.8(a)
Initial compliance report that includes initial performance test, monthly schedule to be used in making compliance determinations, design and equipment specifications and compliance method.	60.8(d), 60.8(a), 60.546(a) through (e)
Demonstration of continuous monitoring system.	60.7(a)(5)
Physical or operational change.	60.7(a)(4)
Periodic startup, shutdown, malfunction reports, and periods where the continuous monitoring system is inoperative.	60.7(b)
Seeking to comply with an alternative method, from use of applicable percent emission reduction requirement to applicable total (uncontrolled) monthly VOC use limit.	60.546(h)

Reports	
Initial and annual formulation data or Method 24 results to verify VOC content of water-based sprays.	60.546(j)
Excess emissions report.	60.546(f) and (g)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Maintain a file of all measurements including, performance test measurements, and all other information required by this part recorded in a permanent file suitable for inspection. The file shall be retained for at least two years.	60.7(f)
Maintain records of operating parameters of monitoring device results for catalytic or thermal incinerator, or carbon absorber.	60.545(a), (b) and (c)
Maintain records of monthly VOCs use, number of days in compliance period, and other information needed to verify results of all monthly tests.	60.545(d) and (e)
Maintain records of formulation data or results of Method 24 analysis of water-based sprays containing less than 1.0 percent of VOC.	60.545(f)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way. 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

Respondent Activities	
Read instructions.	
Install, calibrate, maintain, and operate a temperature monitoring device with a continuous recorder, an organics monitoring device with a continuous recorder to detect the concentration level of organic compounds, or a recovery device, as applicable.	

Respondent Activities
Perform initial performance test, Reference Method 24 test or formulation data analysis for the determination of the VOC content of cements or green tire spray materials, Method 25A for the determination of the VOC concentration if using a control device, Method 2 for the determination of the flow rate at the stack gas, monthly performance test or formulation data analysis of the spray material, and repeat performance test 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 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 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 data for approximately 125,000 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 two years.

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB).

6. Estimating the Burden and Cost of the Collection

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

The Agency may 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 13,323 (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 NSPS 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	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2003, Table 10. Private industry, 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 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(s) and other costs such as photocopying and postage.

Two types of monitoring devices are used to collection information: the gas stream monitoring device and the VOC monitoring device. The gas stream temperature monitoring device has a continuous recorder to measure the temperature before and after the emission reduction at the control device. The VOC monitoring device has a continuous analyzer to measure the outlet gas concentration when a VOC recovery device is used.

(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/Star tup 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 (organics) monitor	\$35,000	0	\$0	\$7,500	0	\$0

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/Star tup 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)
Temperatur e monitors at thermal and catalytic incinerators	\$7,500	0	\$0	\$4,000	4.1 ¹	\$16,400
Total Cost						\$16,400

¹ An estimated 10 percent of the respondents use a temperature monitor.

There are no total capital/startup costs for this ICR because we have assumed that none of the existing tire manufacturing plants that are not currently subject to the rule or any new plants built will conduct an operational change that triggers rule applicability. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$16,000 (rounded). This is the total of column G in the above table. The total respondent costs over the next three years, which is calculated as the addition of the capital/startup costs and the annual operation and maintenance costs, is estimated to be \$16,000.

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 \$12,520.

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

Managerial	\$54.66	(GS-13, Step 5, \$34.16 x 1.6)
Technical	\$40.56	(GS-12, Step 1, \$25.35 x 1.6)
Clerical	\$21.95	(GS-6, Step 3, \$13.72 x 1.6)

These rates are from the Office of Personnel Management (OPM) 2004 General Schedule which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Burden and Cost for the Federal Government: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB), below.

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

Based on our research for this ICR, approximately 41 existing sources are currently

subject to the standard. It is estimated that no new sources per year will become subject to the standard in the next three years.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(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	4.1	4.1	36.9	4.1	41
2	4.1	4.1	36.9	4.1	41
3	4.1	4.1	36.9	4.1	41
Average	4.1	4.1	36.9	4.1	41

¹ New respondents include sources with constructed, reconstructed and modified affected facilities (10% x 41 = 4.1). The remainder must keep records (90% x 41 = 36.9).

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 41.

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
Method 25A	3	1	0	3
Annual Report of Formulation Data/Method 24	41	1	0	41
Semiannual Report of Excess Emissions	13.7	2	0	27.4
Report of Operational Change	4.1	1	0	4.1
Notification of Change in Spray Materials Formulation	4.1	1	0	4.1
TOTAL			0	79.6

The number of Total Annual Responses is 80 (rounded), as describe above. The total annual labor costs are \$850,093. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB).

Note that the total annual capital and O&M costs to the regulated entity are \$16,000. 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 are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 167 hours per response.

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 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 167 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-2007-0125. 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), 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-2007-0125 and OMB Control Number 2060-0156 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Burden Item	(A) Technical 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^a	(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,\$^b
i. Notification of actual startup ^c	2	1	2	0	0	0	0	\$0.00
ii. Notification of initial performance test ^{a, b}	2	1	2	0	0	0	0	\$0.00
iii. Initial performance test results ^{a, b}	2	1	2	0	0	0	0	\$0.00
iv. Notification of Method 25A test ^f	4	1	4	3	12.0	0.6	1.2	\$880.50
v. Notification of construction or reconstruction ^{a, b}	2	1	2	0	0	0	0	\$0.00
vi. Report of physical/operational changes ^g	4	2	8	4.1	32.8	1.64	3.28	\$2,406.70
vii. Report of spray materials/ formulation change ^h	4	2	8	4.1	32.8	1.64	3.28	\$2,406.70
viii. Semiannual reports ⁱ	10	2	20	13.7	274.0	13.7	27.4	\$20,104.75
ix. Annual report of formulation data/Method 24 results ^j	4	1	4	41	164.0	8.2	16.4	\$12,033.50
5. Recordkeeping Requirements								
A. Read Instructions	Included in 4A							
B. Plan Activities	Included in 4B							

Burden Item	(A) Technical 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 ^a	(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,\$ ^b
C. Implement Activities	Included in 4B							
D. Develop Record System	N/A							
E. Time to Enter and Transmit Information: ^k								
i. Records of startup, shutdowns and malfunction ¹	0.5	36	18	41	738.0	36.9	73.8	\$54,150.75
ii. Records of monthly performance test	Included in 4B							
iii. Records of emissions and operations	Included in 4B							
F. Time to Train Personnel	N/A							
G. Time for Audits	N/A							
Subtotal Labor Burden					11,585.6	579.28	1,158.56	\$850,093.40
TOTAL LABOR BURDEN AND COST (Rounded)					13,323			\$850,093

Assumptions:

^a We have assumed that there are 41 existing rubber tire manufacturing plants subject to this standard, one of which mixes only rubber compound. Also, we have assumed that no new tire manufacturing plants will become subject to the standard in the next three years. In addition, we have not included the reporting requirements burden for affected facilities exemptions under 40 CFR '60.676(d) in the table because their occurrence is very rare in practice.

^b This ICR uses the following labor rates: \$95.32 for Managerial labor, \$64.60 for Technical labor, and \$40.09 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, ATable 10. Private industry, by occupational and industry group. © The rates are from column 1, ATotal compensation. © The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that the rubber tire manufacturing plants will not construct or reconstruct an affected facility, however, they will conduct operational changes on 10 percent of the affected operations.

- ^d A new plant typically would have about five new affected facilities. However, we are assuming that no new plants will become subject to this rule.
- ^e Sources are required to monitor and record monthly performance tests, VOC use, the number of days in each compliance period, control device efficiency, formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray, monitoring device data and other operational data such as the number of tires processed. We have assumed sources will operate approximately 252 days per year or 36 weeks. We have further assumed that the burden incurred to record these items is one hour per occurrence since much of the required information would be currently recorded by the industry with or without regulation.
- ^f We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine the VOC concentration in each stack (source using a capture system) both entering and leaving the control device.
- ^g We have assumed that ten percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/operational change due adding a green tire spray booth or a new line.
- ^h A source is required to do Method 24 or formulation data analysis if the operational change involves spray materials formulation changes and results should be reported within 30 days.
- ⁱ We have assumed that one-third of the sources report will submit exceedance reports for each six month period.
- ^j We have assumed that all existing sources, will submit an annual Method 24 report or an annual formulation data report to verify the VOC content of each tread end cement and green tire spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources will continue to use HAP materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing add on control devices. The remaining plants use only water-based sprays and are not required to do monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence per source due to the nature of the control equipment used and its intermittent use.
- ^k We have assumed two occurrences of startup, shutdown and/or malfunction per source per month which yields an average of 18 occurrences per source per respondent(36 weeks).

Table 2. Annual Burden and Cost for the Federal Government: NSPS for Rubber Tire Manufacturing (40 CFR part 60, subpart BBB)

Burden Item	(A) Technical Person hours per occurrence	(B) Number of occurrences per plant per year	(C) Person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technica l hours per year (E=CxD)	(F) Management hours per year (F=0.05xE)	(G) Clerical- person hours per year (G=0.1xE)	(H) Cost, \$ ^b
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0.00
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0.00
Report of performance test results ^c	2	1	2	0	0	0	0	\$0.00
Notification of construction or reconstruction ^c	2	1	2	0	0	0	0	\$0.00
Notification of Method 25A Test ^d	8	1	8	3	24	1.2	2.4	\$1,091.71
Notification of change in spray materials formulation ^e	2	1	2	4.1	8.2	0.41	0.82	\$373.00
Semiannual reports ^f	4	2	8	13.7	109.6	5.48	10.96	\$984.65
Annual report of formulation data/Method 24 results ^g	5	1	5	41	205	10.25	20.50	\$9,325.05
Report of physical/operational changes ^h	4	1	4	4.1	16.4	0.82	1.64	746.00
Subtotal					363.2	18.16	36.32	\$12,520.41
TOTAL LABOR BURDEN	418							

Burden Item	(A) Technical Person hours per occurrence	(B) Number of occurrences per plant per year	(C) Person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technica l hours per year (E=CxD)	(F) Management hours per year (F=0.05xE)	(G) Clerical- person hours per year (G=0.1xE)	(H) Cost, \$ ^b
AND COST (rounded)	\$12,520							

Assumptions:

^a We have assumed that there are 41 existing rubber tire manufacturing plants subject to this standard, one of which mixes only rubber compound. Also, we have assumed that no new tire manufacturing plants will become subject to the standard in the next three years.

^b We have assumed the following labor rates of \$55.66 for Managerial labor, \$40.56 for Technical labor, and \$21.95 for Clerical labor. These rates are from the Office of Personnel Management (OPM) A2004 General Schedule@ which excludes locality rates of pay.

^c The regulatory agency will have no burden associated with initial requirements since there will be no new sources.

^d We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine the VOC concentration in each stack (source using a capture system) both entering and leaving the control device.

^e A source is required to do Method 24 or formulation data analysis if the operational change involves spray materials formulation changes and results should be reported within 30 days.

^f We have assumed that one-third of sources will submit exceedance reports for each six month period.

^g We have assumed that all existing sources, will submit an annual Method 24 report or an annual formulation data report to verify the VOC content of each tread end cement and green tire spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources will continue to use HAP materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing add on control devices. The remaining plants use only water-based sprays and are not required to do monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence per source due to the nature of the control equipment used and its intermittent use.

^h We have assumed that ten percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/operational change due adding a green tire spray booth or a new line.