

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal), ICR 1964.04, OMB Control Number 2060-0496.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wet-formed Fiberglass Mat Production were proposed on May 26, 2000 (65 FR 34251), and promulgated on April 11, 2002 (67 FR 17823). These standards apply to new and existing component processes at industrial facilities that manufactured wet-formed fiberglass mat including preparation of glass fibers, formation of fibers into a fiberglass mat, saturation with urea-formaldehyde binder solution, curing and drying the binder-coated fiberglass mat, cooling the mat, and trimming, cutting, and packaging. This information is being collected to assure compliance with 40 CFR part 63, subpart HHHH.

The monitoring, recordkeeping, and reporting requirements outlined in these rules are similar to those required for other NESHAP regulations. Consistent with the NESHAP General Provisions (40 CFR part 63, subpart A), respondents are required to submit initial notifications, conduct performance tests, and submit semiannual reports. They are also required to maintain records of applicability determinations; performance test results; exceedances; periods of startup, shutdown, or malfunction; monitoring records; and all other information needed to determine compliance with the applicable standard.

An 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. Records and reports must be retained for a total of 5 years, two years on-site. The files may be maintained on microfilm, on a computer or floppy disks, on magnetic tape disks, or on microfiche. 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.

The Agency has determined that there are 14 existing respondents, i.e., formed fiberglass mat production facilities which are major sources of hazardous air pollutants (HAPs) that are currently subject to NESHAP, subpart HHHH, based on data obtained during the development of this rule. In addition, we have determined that there is an average of one production line per facility. Therefore, there are 14 respondents subject to this NESHAP regulation. No net growth

in this industry is expected over the three-year period.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

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 (HAP). These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, metal hazardous air pollutants from component processes at industrial facilities manufacturing wet-formed fiberglass mat cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart HHHH.

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

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations that were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings. Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual compliance certifications are used to determine periods of excess emissions, identify problems at the facility, verify operation and maintenance procedures and for compliance determinations.

### **3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart HHHH.

#### **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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

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

Upon review of the standard, information available on the Agency databases, and consultation with the Office of Air, Quality Planning and Standards, we have determined that the recordkeeping and reporting requirements in the "Active" ICR are fully supported and necessary to fulfill the requirements of the Clean Air Act (CAA). Any pertinent comments received since the last ICR renewal including those submitted in response to the first federal register notice announcing the renewal of this ICR, have been reviewed, and it has been determined that no further consultations with industry are necessary to calculate the burden for this renewal. It should be noted that the respondents, the industry trade associations including the Technical Association of the Pulp and Paper Industry (TAPPI) and the Asphalt Roofing Manufacturers Association (ARMA), and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed.

#### **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 that 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 the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent 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**

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 and NAICS Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of wet-formed fiberglass mat production, which provides the substrate for several roofing products. The Standard Industrial Classification (SIC) Code for wet-formed fiberglass mat production is classified under SIC code 3329325, a subset of SIC code 3329, Pressed and Blown Glass, Not Elsewhere Classified, which under the new North American Industrial Classification System (NAICS) codes would be NAIC code 327212, Non-woven Fabric Mills.

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

**(i) Data Items**

All data in this ICR that are recorded and/or reported are required by NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH).

A source must make the following reports:

<b>Notification Reports</b>	
Initial notification requirements	63.9(b)(1)
Notification of compliance status when a source becomes subject to the standard	63.9(h), 63.3000(b)
Notification that source is subject to special compliance requirements, if applicable	63.9(d)
Notification of performance test	63.7(b), 63.9(e)
Rescheduled of performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Change in information already provided	63.9(j)
Request for an extension of compliance with relevant standard	63.9(c)

<b>Reports</b>	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(6)(d)
Performance test results	63.10(d)(2), 63.3000(d)
Startup, shutdown and malfunction plan	63.6(e)(3)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i), 63.3000(e)
Progress reports for compliance extension (if applicable)	63.6(i)
Semiannual compliance reports	63.3000(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Startup, shutdown and malfunction plan	63.6(e)(3)
All reports and notifications	63.10(b)(1)
Records of startup, shutdown, and malfunction of process equipment	63.10(b)(2)(i), (iv), (v)
Records of malfunctions of air pollution control equipment	63.10(b)(2)(ii)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	63.10(b)(3)
Records of maintenance of air pollution control equipment	63.10(b)(2)(iii)

<b>Recordkeeping</b>	
Records of flow monitoring system performance evaluations, malfunctions, calibrations, and adjustments	63.10(b)(2)(vi), (vii), (viii), (ix), (x), (xi), 63.10(c)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	63.10(b)(2)(xii)
Documentation of initial notifications	63.10(b)(2)(xiv)
Five-year retention of records	63.10(b)(1), 63.2999(a)

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

<b>Respondent Activities</b>
Read instructions.
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.

Regulatory agencies, to the extent possible, are relying more on automated techniques such as electronic submissions of reports, and are improving their tracking systems and database systems to enhance the use of these techniques. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

## **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.

<b>Agency Activities</b>
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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The report of annual compliance tests is 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 headquarters and EPA regional offices. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

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

Two of the 14 existing facilities subject to this NESHAP are classified as small businesses under the Small Business Administration definition (750 or fewer company employees). However, the impact on small businesses was accounted for in the regulation development. Because most of the monitoring and recordkeeping requirements in the final rule are necessary to insure proper operation of emission control equipment, plants will need to collect the information for their own records to show compliance with the emission standards. Thus, EPA does not expect that any affected source, including small businesses, will experience adverse impacts due to the reporting and recordkeeping requirements of this rule.

### **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: NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal).

## **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 1,966 hours. 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:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only types of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. This is based on the assumptions that all existing sources are in compliance with initial rule requirements and there will be no new lines constructed over the three-year period of this ICR. The annual operation and maintenance costs are the ongoing costs to maintain the continuous emission monitors and other costs such as photocopying and postage. We are not attributing to industry any O&M costs as a result of this rule because the use of flow and temperature monitors at thermal oxidizers are necessary to determine whether these are operating properly.

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



There are no average annual costs to industry for capital/startup and operation and maintenance associated with continuous monitoring equipment over the next three years of the ICR due to the assumptions discussed above.

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

The only costs to the Agency are labor costs associated with analysis of the reported information. Respondents will bear the cost through permit fees, for daily performance tests conducted at the plant by a certified observer provided by the State enforcement agency. 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 \$20,270 (rounded). This cost is based on the average hourly labor rate as follows:

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Burden and Cost to the Federal/State Government: NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal).

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

Based on our research for this ICR, we have determined that there are approximately 14 respondents subject to the regulation. We have further assumed that there will be no new lines constructed in the next three years; therefore, there will be no new respondents.

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

<b>Number of Respondents</b>					
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>		
<b>Year</b>	<b>(A) Number of New Respondents <sup>1</sup></b>	<b>(B) Number of Existing Respondents</b>	<b>(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports</b>	<b>(D) Number of Existing Respondents That Are Also New Respondents</b>	<b>(E) Number of Respondents (E=A+B+C-D)</b>
1	0	14	0	0	14
2	0	14	0	0	14
3	0	14	0	0	14
Average	0	14	0	0	14

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

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 14.

The number of Total Annual Responses is 32, as described below.

<b>Total Annual Responses</b>				
<b>(A) Information Collection Activity</b>	<b>(B) Number of Respondents</b>	<b>(C) Number of Responses</b>	<b>(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>	<b>(E) Total Annual Responses E=(BxC)+D</b>
Initial Notifications	0	5	0	0
Performance test reports	0	1	0	0
Semiannual compliance reports	14	2	0	28
Startup, shutdown and malfunction reports	2	2	0	4
Total				32

The Total Hours are 1,966. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal), attached.

There are no annualized capital/startup and O&M costs to the regulated entities subject to the regulation. The cost calculations are detailed in Section 6(b) (iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 501 labor hours at a cost of \$20,270 (rounded). See Table 2. Annual Agency Burden and Cost:

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal).

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor costs are \$158,672. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal), attached.

There are no annualized capital/startup and O&M costs to the regulated entities. The cost calculations are detailed in Section 6(b) (iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 501 labor hours at a cost of \$20,270. See Table 2. Annual Agency Burden and Cost: NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal), attached.

### **6(f) Reasons for Change in Burden**

There is no change in burden from the most recently approved ICR.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 61 (rounded) 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-2008-0431. 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0431 and OMB Control Number 2060-0496 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 Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal)**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person-hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person-hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person-hours per year (Ex0.1)</b>	<b>(H) Cost, \$ <sup>b</sup></b>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	1	1	1	0	0.0	0.0	0.0	\$0.00
B. Required activities:								
i. Initial Performance tests: <sup>c</sup>	200	1	200	0	0.0	0.0	0.0	\$0.00
ii. Repeat of performance test	200	1	200	0	0.0	0.0	0.0	\$0.00
iii. Monitoring of operations and equipment: <sup>d</sup>	Included in 5E							
iv. Operation, maintenance, monitoring plan	40	1	40	0	0.0	0.0	0.0	\$0.00
v. Startup, shutdown,	40	1	40	0	0.0	0.0	0.0	\$0.00



<b>Burden item</b>	<b>(A) Person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person- hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person- hours per year (Ex0.1)</b>	<b>(H) Cost, \$ <sup>b</sup></b>
ix. Startup, shutdown, malfunction report <sup>f</sup>	8	2	16	2	32	1.6	3.2	\$2,970.82
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	N/A							
E. Time to enter and transmit all information required by the rule <sup>g</sup>	1.75	52	91	14	1,274	63.7	127.4	\$118,275.61
F. Time to train personnel	N/A							
G. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST					1,709.2	85.5	170.9	\$158,671.85
TOTAL LABOR HOURS (Rounded)					1,966			\$158,672

**Assumptions:**

<sup>a</sup> There are an estimated 14 respondents (i.e., wet-formed fiberglass mat production facilities), 13 with one production line and one with two lines, which are subject to this standard. We have assumed that there will be no new lines constructed over the three year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2.Civilian Workers, 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.

<sup>c</sup> We have assumed that all sources are in compliance with initial rule requirements including the initial performance test. The rule requires a performance test every five years since the initial test was conducted; however, this requirement would not be applicable for this ICR renewal. We have estimated that each performance test will take approximately 21 hours to complete it since sources will be using EPA Method 316 to measure formaldehyde and applicable test methods specified in the NESHAP to determine resin free-formaldehyde content and the loss-on-ignition of the fiberglass mat. In addition, we have assumed that it will take approximately 200 hours to conduct the pretest survey, equipment calibration, and sample analysis and report preparation for a total of 221 hours per performance test. We have further assumed that 20 percent of the performance tests fail and will have to be repeated.

<sup>d</sup> Monitoring of operations include: 1) monitoring operating parameters for control equipment (i.e., thermal oxidizer or other control equipment); 2) urea-formaldehyde (UF) resin solids application rate; 3) resin-free formaldehyde content; 4) loss-on-ignition; 5) UF-to-latex ratio in the binder; 6) weight of the final mat product per roofing square; and 7) average nonwoven wet-formed fiberglass mat production rate (roofing square per hour).

<sup>e</sup> We have assumed that approximately 80 percent of the 14 respondents (or 11.2) will report no excess emissions twice a year and approximately 20 percent (or 2.8) will report no excess emissions twice a year.

<sup>f</sup> We have assumed that 2 of the 14 facilities will have a startup, shutdown or malfunction (SSM) that is not managed according to the SSM plan.

<sup>g</sup> We have assumed it takes each source approximately 1.75 hours per week to record and transmit the information and that a year will consist of 52 weeks.



**Table 2. Annual Agency Burden and Cost:  
NESHAP for Wet-formed Fiberglass Mat Production (40 CFR part 63, subpart HHHH) (Renewal)**

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 Notifications: applicability, performance test, compliance status <sup>a</sup>	2	3	6	0	0	0	0	\$0.00
Review reports of excess emissions <sup>c</sup>	16	2	32	11.2	358.4	17.9	35.8	\$16,692.84
Review reports of no excess emissions <sup>c</sup>	8	2	16	2.8	44.8	2.24	4.5	\$2,086.61
Review of startup, shutdown, malfunction report <sup>d</sup>	8	2	16	2i	32	1.60	3.2	\$1,490.43
Subtotal Burden and Cost					435.2	21.8	43.5	\$20,269.88
TOTAL ANNUAL BURDEN AND COST (rounded)					501			\$20,270

**Assumptions:**

<sup>a</sup> There are an estimated 14 respondents (i.e., wet-formed fiberglass mat production facilities), 13 with one production line and one with two lines, which are subject to this standard. We have assumed that all sources are in compliance with initial rule requirements and that there will be no new lines constructed 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 \$56.02 (GS-13, Step 5, \$35.01 x 1.6), Technical rate of \$41.57 (GS-12, Step 1, \$25.98 x 1.6), and Clerical rate of \$22.50 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that approximately 80 percent of the 14 respondents (or 11.2) will report no excess emissions twice a year and approximately 20 percent (or 2.8) will report no excess emissions twice a year.

<sup>d</sup> We have assumed that two of 14 respondents per year will have a startup, shutdown, or malfunction occurrence that is not managed according to the plan.