

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Reinforced Plastic Composites Production (40 CFR part 63, subpart WWWW) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Reinforced Plastic Composites Production (40 CFR part 63, subpart WWWW) (Renewal), EPA ICR Number 1976.04, OMB Control Number 2060-0509

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites (RPC) Production Operations and Processes were proposed on August 2, 2001 (66 FR 40323), and promulgated on April 21, 2003 (68 FR 19375). These standards regulate fugitive emissions from reinforced plastic composites (RPC) production operations and processes resulting from hazardous air pollutants (HAPs) evaporating from the resins, gel coats, and cleaning solvents. The owner or operator of a RPC manufacturing facility must control HAPs emissions by either limiting the HAP content of materials used and using non-atomized spray application in the manufacturing processes or by using an enclosure and add-on control device. This information is being collected to assure compliance with 40 CFR part 63, subpart WWWW.

Owners and operators of affected sources are subject to the monitoring, recordkeeping and reporting requirements of 40 CFR part 63, subpart A, the General Provisions, unless specified otherwise in the regulation. This rule requires sources to submit initial notifications, conduct performance tests if source is using an add-on control device, and submit periodic compliance reports. In addition, sources are required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation if using an add-on control device; any period during which the monitoring system is inoperative; parametric monitoring data; system maintenance and calibration; and work practices to demonstrate initial and ongoing compliance with the regulation.

We have determined that there is approximately an average of 504 respondents (i.e., 488 existing and 16 new RPC manufacturing facilities) subject to NESHAP, subpart WWWW. In the previous ICR renewal, this information was confirmed with the rule lead addressing this source category at the Office of Air Quality Planning and Standards, information available in the active ICR, and existing background industry information gathered during the development of the rule and on EPA databases.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The Clean Air Act (ACT) provides authority to the Agency to establish standards to control air pollution and to ensure compliance with promulgated regulations through adequate recordkeeping and reporting by the affected industries (i.e., respondents). The regulations include: the New Source Performance Standards (NSPS) under section 111 of the Act; the National Emission Standards for Hazardous Air Pollutants (NESHAP) which includes the original NESHAP standards and the more recent Maximum Achievable Control Technology (MACT) or NESHAP-MACT standards under section 112 of the Act; and the emission guidelines for the designated types of incinerators under section 129 of the Act.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard(s) are used by regulatory agencies, the public and the regulated community for a variety of reasons including the determination of the respondent's compliance status, analytical studies to demonstrate compliance trends, and evaluations regarding the efficacy of the promulgated regulations.

The required recordkeeping and reporting are also used to: 1) certify compliance with the regulations; 2) determine the respondent's compliance with the designated emission limitation(s); 3) notify regulatory agencies when a standard is violated; 4) evaluate continuous compliance through the use of emission or operational parameter monitors; and 5) ensure that plant personnel are following the required procedures and are periodically trained as indicated.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

The standards do not require the duplication in the collection and reporting of information. If the subject standards have not been delegated, the information is sent directly to the appropriate Environmental Protection Agency (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.

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

The estimated number of sources and assumptions for each category were based on a review of the standard, information available in the active ICR, existing industry information gathered during the development of the rule and on EPA databases, and consultation with Keith Barnett, the rule lead addressing this source category at the Office of Air Quality Planning and Standards (OAQPS).

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. In this case, no comments were received. 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 Agency involved RPC manufacturers, including 17 small firms, and their trade association in the development of this NESHAP and the associated recordkeeping and reporting requirements.

3(d) Effects of Less Frequent Collection

The effect of less frequent collection would be a decrease in the margin of assurance that facilities are achieving the emission reductions mandated by the Clean Air Act through the promulgation of the applicable regulations. In addition, the likelihood of detecting the poor operation and maintenance of control equipment decreases and the detection of noncompliance becomes problematic.

3(e) General Guidelines

The reporting and the recordkeeping requirements do not violate the regulations established by Office of Management and Budget (OMB) at 5 CFR part 1320, section 1320.5. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent with the Permit Program at 40 CFR part 70, and the five-year statute of limitations on which the permit program is based.

The retention of records for five years allows EPA to establish the compliance history of the respondent for purposes of determining the appropriate level of enforcement action. Historically, EPA notes that the most flagrant violations have extended beyond a five-year period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting non-compliance.

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

The recordkeeping and reporting requirements do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents SIC and NAICS Codes

Respondents are owners or operators of RPC manufacturing facilities. The following processes and operations constitute RPC manufacturing: closed mold and open mold fiberglass manufacturing; resin and gel coat mixing; resin and gel coat application equipment cleaning; and resin and gel coat storage. The Standard Industrial Classification (SIC) code(s) and corresponding North American Industry Classification System (NAICS) for the respondents are listed below.

Category	SIC code	NAICS code	Examples of regulated entities
Industry	3087 3084 3089 3088 3089 3999 3281 3713 3716 3792	325991 326122 326191 326199 327991 336211 336213 336214	Reinforced plastic composites production facilities that manufacture and/or repair intermediate and/or final products using HAP containing thermoset resins and gel coats.
Federal Government			Federally owned facilities that manufacture and/or repair intermediate and/or final products using HAP containing thermoset resins and gel coats.

This table is not meant to be exhaustive, but rather provides a guide for readers regarding the entities likely to be regulated by this standard. To determine whether the standard applies to a particular entity, review the applicability provisions in the standard.

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 WWWW).

A source must make the following reports:

Notification Reports	
Initial notification requirements	63.9(b)(1)
Notification of compliance status when a source becomes subject to the standard	63.9(h), 63.5755(a)
Notification that source is subject to special compliance requirements, if applicable	63.9(d)
Notification of performance test	63.7(b), 63.5755(a)
Rescheduled of performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g), 63.5755(a)
Change in information already provided	63.9(j)
Request for an extension of compliance with relevant standard	63.9(c)

Reports	
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), 63.5755
Startup, shutdown and malfunction plan	63.6(e)(3), 63.5758(d)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i), 63.5758
Progress reports for compliance extension (if applicable)	63.6(i)
Semiannual compliance reports	63.5758(b-c)

A source must keep the following records:

Recordkeeping	
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)
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)

Recordkeeping	
Five-year retention of records	63.10(b)(1), 63.5764(b)

Electronic Reporting

At the present, many respondents to Clean Air Act standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. 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.

(ii) Respondent Activities

Respondent Activities
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 one or more of 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 AIRS Facility Subsystem (AFS).

5(b) Collection Methodology and Management

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or through an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the Agency or delegated authority.

The results of these evaluations are entered into the AIRS Facility Subsystem (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. The EPA and its delegated authorities can retrieve and analyze the data.

5(c) Small Entity Flexibility

The majority of the 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 development of the regulation. In the final rule, EPA has provided the maximum degree of flexibility to minimize impacts on small businesses by providing several different compliance options, several of which require a minimum amount of recordkeeping and reporting requirements. Small entities that would be subject to the regulation would not be systematically impacted more than larger entities. Although the recordkeeping requirements are the same for small and large businesses, EPA considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses. 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. In the Economic Impact Analysis of the Final Reinforced Plastics NESHAP¹, 78 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 78 percent of the 504 facilities affected by this ICR, or 393 facilities, are small entities.

¹ Economic Analysis of the Final Reinforced Plastics NESHAP, U.S. EPA, August 2002, EPA-452/R-02-007

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 Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), attached.

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. 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 respondent burden is shown in Table 1. The labor hours in Table 1 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% to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activity required by the subject standard are operating and maintenance and labor costs. There are no capital/startup costs. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. This is based on the assumption that all existing sources are in compliance

with initial rule requirements and the assumption that the monitoring devices are integral parts of the control devices necessary to determine whether these are operating properly. The annual operation and maintenance (O&M) costs are the ongoing costs to maintain the continuous emission monitors and other costs such as file storage, photocopying and postage.

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

The total annualized operation and maintenance cost to industry over the three-year period of this ICR is \$22,000 (rounded). Based on the assumptions discussed above, the only costs to industry result from other types of operation and maintenance costs, not related to operation of the monitoring equipment, which include file storage, photocopying and postage. We have estimated that file storage and photocopying costs per response are estimated at \$12.50 per hour of clerical labor. First class postage is estimated at \$7.63 per response for mailing to regulatory agencies. The estimated operation, maintenance, and purchase of services costs averaged over the first 3 years are expected to be \$22,000 (rounded) based on 1,077 responses and an average of one hour of clerical work per response for storage and photocopying.

6(c) Estimating Agency Burden and Costs

The only costs to the Agency are those 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 and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$125,414 (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 Government: NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), attached.

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

The 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 Respondents¹	(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	16	488	0	0	488
2	16	504	0	0	504
3	16	520	0	0	520
Average	16	504	0	0	504

¹ 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 504.

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
Notification of compliance status	16	1	0	16
Notification/application of construction	16	1	0	16
Notification of actual startup	16	1	0	16
Notification of performance test and test plan	2	1.2	0	2.4
Report of performance test results	2	1.2	0	2.4
Report of exceedances	100.8	2	0	201.6
Report of no exceedances	403.2	2	0	806.4
Report of startup, shutdown, malfunction	16	1	0	16
Total				1,076.8

The number of Total Annual Responses, 1,077 (rounded), is shown in column E.

The total annual labor hours are 17,740 (rounded). The total annual labor cost may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Reinforced Plastic

Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), attached.

The average annual Agency burden and cost over next three years is shown in Table 2: Annual Burden and Cost to the Federal/State Government: NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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.

(i) Respondent Tally

The total annual labor costs are \$1,432,143 (rounded). Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Cost.

(ii) The Agency Tally

The average annual Agency burden hours and cost over next three years is shown in Table 2: Annual Burden and Cost to the Federal/State Government: NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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 16 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2008-0432. 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-2008-0432 and OMB Control Number 2060-0509 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 Reinforced Plastic Composites Production
(40 CFR Part 63, Subpart WWWW) (Renewal)**

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 ^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
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	/A							
4. Reporting Requirements								
A. Read instructions:								
i. Facilities with 4 groups of operations	12	1	12	14.9	178.8	8.94	17.9	\$16,600.29
ii. Facilities with 5 groups of operations	13	1	13	1.1	14.3	0.72	1.43	1,328.05
B. Required activities:								
Sources with add-on controls								
i. Initial performance test ^c	320	1	320	2	640.0	32.0	64.0	59,416.32
ii. Repeat of performance test	320	1	320	0.4	128.0	6.4	12.8	11,883.26
iii. Operation, maintenance,	40	1	40	2	80.0	4.0	8.0	7,427.04

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 ^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
monitoring plan								
iv. Startup, shutdown, malfunction plan	20	1	20	2	40.0	2.0	4.0	\$3,713.52
v. Monitoring of operating parameters and equipment: ^d	Included in 5E							
C. Gather Existing Information	Included in 5D, 5E							
D. Write report ^{a,c}								
i. Notification of compliance status	4	1	4	16	64.0	3.2	6.4	\$5,941.63
ii. Notification of construction/ reconstruction ^a	2	1	2	16	32.0	1.6	3.2	\$2,970.82
iii. Notification of actual startup	2	1	2	16	32.0	1.6	3.2	\$2,970.82
iv. Notification of performance test	2	1	2	2	4	0.2	0.4	\$371.35
v. Reports of performance test results	Included in 4B							
vii. Report of exceedances ^f	16	2	32	100.8	3,225.6	161.3	322.6	\$299,461.90
viii. Report of no exceedances	8	2	16	403.2	6,451.2	322.6	645.1	\$598,919.55

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 ^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
ix. Startup, shutdown, malfunction report ^g	2	1	2	16	32.0	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 (spreadsheets): ^h								
i. System for low HAP resin	4	1	4	14	56.0	2.8	5.6	\$5,198.93
ii. System for work practices	1	1	1	16	16.0	0.8	1.6	\$1,485.41
iii. System for add-on control devices	2	1	2	2	4.0	0.2	0.4	\$371.35
E. Time to enter and transmit all information into record system ^h								
i. Enter information on low HAP resin	10	1	10	396	3,960	198.0	396.0	\$367,638.48
ii. Enter information on work practices and operating	N/A							

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 ^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
parameters								
F. Develop operator training course and keep records of operators taken it	10	1	10	16	160	8.0	16.0	\$14,854.08
G. Time to train personnel:								
i. Small facilities (less than 100 employees)	2	1	2	13.1	26.2	1.3	2.6	\$2,430.53
	0.4	1	0.4	413.3	165.3	8.3	16.6	\$15,348.26
ii. Medium facilities (100-250 employees)	4	1	4	1.8	7.2	0.4	0.7	\$671.48
	0.8	1	0.8	55.4	44.32	2.2	4.4	\$4,109.98
iii. Large facilities (more than 250 employees)	8	1	8	1.1	8.8	0.4	0.8	\$813.93
	1.6	1	1.6	35.3	56.5	2.8	5.7	\$5,245.04
H. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST					15,426.2	771.3	1,542.6	\$1,432,142.83
TOTAL LABOR HOURS (Rounded)					17,740			\$1,432,143

Assumptions:

^a There is an average of 488 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be an average of 16 new RPC facilities each year over the three year period of this ICR of which 93 percent (or 14.9) will consist of facilities with 4 groups of

operations and 7 percent of facilities with 5 groups of operations. There is an average of 504 existing respondents per year over the next three year period of this ICR.

^b 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.

^c New respondents have to comply with the initial rule requirements including notifications and performance tests. We have assumed that two new respondents per year will install add-on controls equipment and therefore, will be require to conduct an initial performance test. We have assumed that performance tests are repeated by 20 percent of the respondents.

^d Monitoring and recordkeeping of operations for respondents with enclosures and add-on control devices include: 1) specific operating parameters for each control device established during the performance test, 2) start-up, shutdown, and malfunctions of equipment, and 3) work practices.

^e Monitoring and recordkeeping of operations for respondents that comply by limiting the HAP content of their raw materials include: 1) monitoring and recording in a spreadsheet the monthly consumption of material and the weighted-average HAP content over the past 12 months, and 2) work practices. However, if all the materials in an operation meet the HAP content limit, then each respondent would need only to record HAP content and would not need to track monthly consumption or record the computations. For open molding and centrifugal casting operations, respondents would also have the option of averaging among thirteen different processes (open molding) and two different processes (centrifugal casting to calculate the monthly average of the actual and allowable emissions for the combined open molding and centrifugal casting operations.

^f We have assumed that approximately 80 percent of the 504 existing respondents (403.2) will report no excess emissions twice a year and approximately 20 percent (100.8) will report no excess emissions twice a year.

^g We have assumed that all RPC facilities with add-on controls (12 existing and 2 new each year or an average of 16) will have at least one startup, shutdown or malfunction (SSM) that is not managed according to the SSM plan.

^h New respondents (16) have to develop a record system. In addition, existing RPC facilities have to record operational data. In general, the following monitoring is required: 1) facilities with open molding and/or centrifugal casting operations (354 existing and 14 new each year or an average of 396 per year) would have to record for low HAP resins; 2) facilities with add-on controls (12 existing and 2 new or an average of 16 RPCs per year) would have to record add-on control devices operating parameters; and 3) all facilities (504) need to keep records of its work practices. Since operating parameters for control equipment and standard work practices are already monitored by industry for other purposes, we are not attributing these burdens to the rule.

ⁱ We have assumed that the amount of time it takes a respondent to train its employees would vary with the number of employees at its facility. We have also assumed that the distribution in size of the new respondents would be identical to that of the existing PRC universe. Therefore, we have assumed that 82 percent of the respondents would be small business (i.e., 413.3 RPCs existing and 13.1 new RPC per year), 11 percent (i.e. 55.4 existing RPCs and 1.8 new RPCs per year), would be medium business, and 7 percent (i.e., 35.3 existing RPCs and 1.1 new RPCs) are large business. Furthermore, we have assumed that respondents will be providing full training to new employees only. Therefore, it will take existing respondents to train its new employees 20 percent of the time it takes new respondents to train all employees, assuming the same size business.

Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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 ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Notification of applicability ^a	2	1	2	2	4.0	0.2	0.4	\$186.48
Notification of intent to construct a major source and review application	12	1	12	16	32.0	10.2	3.2	\$2,300.04
Notification of start of construction	2	1	2	16	32.0	1.6	3.2	\$1,491.87
Notification of actual startup	2	1	2	16	32.0	1.6	3.2	\$1,491.87
Notification of initial performance test and test plan	12	1.2	14.4	2	28.8	1.4	2.8	\$1,343.14
Report of performance test results including operating parameters	12	1.2	14.4	2	28.8	1.4	2.8	\$1,343.14
Notification of compliance status	2	1	2	16	32.0	1.6	3.2	\$1,491.87
Review reports of excess emissions ^c	4	2	8	100.8	806.4	40.3	80.6	\$37,593.15
Review reports of no excess emissions ^c	2	2	4	403.2	1,612.8	80.6	161.3	\$75,188.56
Review of startup, shutdown, malfunction report ^d	4	1	4	16.0	64.0	3.2	6.4	\$2,983.74
Subtotal Burden and Cost					2,672.8	133.64	267.3	\$125,413.86
TOTAL ANNUAL BURDEN AND						3,082		\$125,414

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 ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
COST (rounded)								

Assumptions:

^a There is an average of 488 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be an average of 16 new RPC facilities each year over the three year period of this ICR. Therefore, there is an average of 504 existing respondents per year over the next three year period of this ICR. We have assumed that 82 percent (or 413.3) of the existing RPC facilities are small business, 11 percent (or 55.4) are medium size facilities and 7 percent (or 35.3) are large facilities. Furthermore, we have assumed that 93 percent (or 14.9) of the new RPC facilities will consist of an average of four groups of operations and 7 percent (or 1.1) will consist of five groups of operations.

^b 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.

^c We have assumed that approximately 80 percent of the 505 respondents (or 404) will report no excess emissions twice a year and approximately 20 percent (or 101) will report no excess emissions twice a year.

^d We have assumed that all RPC facilities with add-on controls (12 existing and 2 new each year or an average of 16) will have at least one startup, shutdown, or malfunction occurrence that is not managed according to the plan.