

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal),
EPA ICR Number 1799.05, OMB Control Number 2060-0362

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutant (NESHAP) regulations for Mineral Wool Production, published at 40 CFR part 63, subpart DDD, were proposed on May 8, 1997, and promulgated on June 1, 1999. These regulations apply to each cupola and/or curing oven located at a mineral wool production facility commencing construction or reconstruction after the date of proposal. This standard applies to owners or operators located at a plant site that is a major source of hazardous air pollutant (HAP) emissions. This signifies that the plant emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAPs at a rate of 22.68 megagrams (25 tons) or more per year. This information is being collected to assure compliance with 40 CFR part 63, subpart DDD.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP. Semiannual reports are also required.

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

Based on our consultations with industry representatives, there is an average of 1.5 affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

We have determined that there are an estimated six respondents currently subject to this rule. It is estimated that no additional sources will become subject to the standard over the next three years.

All of the mineral wool production facilities in the United States are owned and operated

by the mineral wool production industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the “Affected Public” is listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal).

In the development of this Information Collection Request (ICR), we addressed the Office of Management and Budget (OMB) “Terms of Clearance” (TOC) on the active ICR which states:

The cost of labor assumptions underlying the respondent and agency burden cost calculations should be updated in the next renewal.

EPA has addressed the items of concern in the TOC as instructed by OMB in the active ICR. See below Tables 1 and 2, respectively.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

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

In the Administrator's judgment, particulates and formaldehyde emissions from the production of mineral wool either 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 DDD.

2(b) Practical Utility/Users of the Data

The information will be used by the delegated authority (state agency or Regional Administrator if there is no delegated state agency) to ensure that the emissions limits and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which plants, records, or processes may need inspection.

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

3(a) Non-Duplication

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

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (74 FR 32580) on July 8, 2009. 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 is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based, in part with our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the North American Insulation Manufacturers Association (NAIMA) at: (703) 684-0084.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

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 with the Part 70 permit program 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 a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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/NAIC Codes

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

4(b) Information Requested

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

(i) Data Items

In this ICR, all the data recorded or reported is required by the NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD).

A source must make the following reports:

Notifications	
Applicability	63.9(a), 63.1191(a)
Construction/reconstruction	63.9(b)(3-4), 63.1191(b)
Actual startup	63.9(b) (2) and (4)
Special compliance requirements	63.9(d), 63.1191(c)
Initial performance test	63.9(e), 63.1191(d)
Compliance status	63.9(h), 63.1191(e)
Request for extension of compliance, adjustments to time periods, and changes in information	63.9(c), (i-j)

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

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, including process equipment, air pollution control equipment, maintenance performed, and actions taken outside the scope of existing plans	63.10(b), 63.1192(a)

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

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Write the notifications and reports listed above.
Perform initial performance test, Reference Method 1, 2, 3, or 3A, 4, 5, 10, and 318 tests, and repeat performance tests if necessary.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Enter information required to be recorded above.
All monitoring systems and equipment must be installed, operational, and properly calibrated before the performance test.
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 existing ways to comply with any previously applicable instructions and requirements.

Respondent Activities
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

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

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

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., 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 to be the minimum requirements 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 below in Table 1: Annual Respondent Burden and Cost - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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 1,581 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$114.77 (\$54.65 + 110%)
Technical	\$97.59 (\$46.47 + 110%)
Clerical	\$48.26 (\$22.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "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 type of industry costs associated with the information collection activities in the subject standard are labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent ¹	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent ¹	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Baghouse Leak Detection	\$22,350	0	\$0	\$750	6	\$4,500
Total			\$0			\$4,500

¹ It is estimated that each respondent has an average of 1.5 cupolas. Therefore, the capital/startup and O&M costs per respond are \$22,350 (\$14,900x1.5) and \$750 (\$500x1.5)

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$4,500. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$4,500.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$22,976 (rounded).

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

Managerial \$61.36 (GS-13, Step 5, \$38.35 + 60%)

Technical	\$45.52 (GS-12, Step 1, \$28.45 + 60%)
Clerical	\$24.64 (GS-6, Step 3, \$15.40 + 60%)

These rates are from the Office of Personnel Management (OPM) “2009 General Schedule”, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately six existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR.

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

Number of Respondents					
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	6	0	0	6
2	0	6	0	0	6
3	0	6	0	0	6
Average	0	6	0	0	6

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 six.

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 applicability	0	1	0	0

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 $E=(B \times C)+D$
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Excess emissions report	1.2	2	0	2.4
Report of no excess emissions	4.8	2	0	9.6
Quality improvement plan	0	1	0	0
Startup, shutdown, and malfunction report	0	1	0	0
Total Number of Annual Responses			Total	12

The number of Total Annual Responses is 12.

The total annual labor costs are \$148,669 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,581. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 132 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$4,500.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 408

labor hours at a cost of \$22,976. See below Table 2: Average Annual EPA Burden – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal).

6(f) Reasons for Change in Burden

There is a change in this ICR as compared to the previous one. Based on our discussions with the mineral wool production industry representative, the decrease is due to the closures of a number of facilities that the industry has been experiencing. There is no growth anticipated in the mineral wool production industry over the next three years.

There is a decrease in the capital/startup and operations and maintenance (O&M) costs from the previous ICR which is also due to the decrease in the number of facilities.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 132 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-2009-0395. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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 Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention:

Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0395 and OMB Control Number 2060-0362 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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) Total Cost Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Read instructions ^c	4	1	4	0	0	0	0	\$0
b. Required activities								
Initial performance test ^d	421	1	421	0	0	0	0	\$0
Repeat performance test ^{d,e}	421	0.2	84.2	0	0	0	0	\$0
Operations, maintenance, monitoring plan ^f	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction plan ^g	40	1	40	0	0	0	0	\$0
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write report								
Notification of applicability ^h	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^h	2	1	2	0	0	0	0	\$0
Notification of actual startup ^h	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements ^h	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^h	2	1	2	0	0	0	0	\$0
Notification of compliance status ^h	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustment to time periods, and changes in Information ^h	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Excess emissions report ⁱ	16	2	32	1.2	38.4	1.92	3.84	\$4,153.14
Report of no excess emissions ^j	8	2	16	4.8	76.8	3.84	7.68	\$8,306.27
Quality improvement plan ^k	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction report ^l	8	2	16	0	0	0	0	\$0
Subtotal for Reporting Requirements						132.48		\$12,459.41

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) Total Cost Per year ^b
4 Recordkeeping requirements								
a. Read instructions ^m	4	1	4	2.1	8.4	0.42	0.84	\$908.50
b. Plan activities	See 3E							
c. Implement activities	See 3E							
d. Develop record system	See 3E							
e. Time to enter information								
Records of operating parameters and Emissions ⁿ	4	52	208	6	1,248	62.4	124.8	\$134,976.82
f. Time to transmit or disclose information ^o	0.25	2	0.5	6	3	0.15	0.3	\$324.47
g. Time to train personnel	N/A							
h. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,448.31		
					1,374.6	68.73	137.46	\$148,669.20
TOTAL LABOR BURDEN AND COST (rounded)						1,580.79 1,581 (rounded)		\$148,669

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is six. There will be no additional new sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$114.77 per hour for Executive, Administrative, and Managerial labor; \$97.59 per hour for Technical labor, and \$48.26 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "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.

^c We have assumed that it will take each respondent 4 hours to read instructions.

^d We have assumed that it will take 421 hours for each respondent to complete performance test based on the following: (1.7 sources per plant x 130 hours per source + 200 hours for calibration, retesting, sample analysis, etc) for a total of 421 hours.

^e We have assumed that 20 percent of respondents will have to repeat performance test due to failure.

^f We have assumed that each of the respondents will take 40 hours to prepare the operation, maintenance, and monitoring plan.

^g We have assumed that each of the respondents will take 40 hours to prepare the startup, shutdown, and malfunction plan.

^h We have assumed that each respondent will take two hours to write reports.

ⁱ We have assumed that 20 percent of respondents will each take sixteen hours two times per year to write excess emission report.

- ^j We have assumed that 80 percent of respondents will take eight hours two times per year to complete the report for no excess emissions.
- ^k We have assumed that 10 percent of facilities are required to prepare a quality improvement plan each year.
- ^l We have assumed that each respondent will take 8 hours two times per year to complete a startup, shutdown, and malfunction report.
- ^m We have assumed that 35 percent of respondents will each take 4 hours to read instructions.
- ⁿ We have assumed that each respondent will take 4 hours 52 times per year to enter information.
- ^o We have assumed that it will take each respondent 15 minutes (0.25 hours) two times per year to transmit or disclose information.

Table 2: Average Annual EPA Burden - NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Initial performance tests								
New or modified facility	40	1	40	0	0	0	0	\$0
Repeat performance test								
New or modified facility ^c	40	0.2	8	0	0	0	0	\$0
Report review								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	1	1	1	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0	0	0	\$0
Quality improvement plan ^d	40	1	40	0	0	0	0	\$0
Operations, maintenance and monitoring plan	40	1	40	0	0	0	0	\$0
Startup, shutdown, and malfunction plan ^e	40	1	40	0	0	0	0	\$0
Report of performance test	40	1	40	0	0	0	0	\$0
Excess emissions reports ^f	20	2	80	1.2	96	4.8	9.6	\$6,345.60
Report of no excess emissions ^g	2	2	4	4.8	19.2	0.96	1.92	\$1,269.12
Startup, shutdown, and malfunction report ^h	20	2	40	6	240	12	24	\$15,361.46
Subtotals Labor Burden and cost					355.2	17.76	35.52	\$22,976.18
TOTAL ANNUAL BURDEN AND COST (rounded)						408.48 408 (rounded)		\$22,976

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is six. There will be no additional new sources over the three-year period of

this ICR.

- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$61.36 Managerial rate (GS-13, Step 5, \$38.35 x 1.6), \$45.52 Technical rate (GS-12, Step 1, \$28.45 x 1.6), and \$24.64 Clerical rate (GS-6, Step 3, \$15.40 x 1.6). These rates are from the Office of Personnel Management (OPM) “2009 General Schedule”, which excludes locality rates of pay.
- ^c We have assumed that 20 percent of respondents will fail the performance test.
- ^d We have assumed that it will take 40 hours for each respondent to review quality improvement plan report.
- ^e We have assumed that it will take 40 hours for each respondent to review the startup, shutdown, malfunction plan.
- ^f We have assumed that 20 percent of respondents will take twenty hours to review excess emissions report.
- ^g We have assumed that 80 percent of respondents will take two hours to it will take each respondent 10 hours to review the plan.
- ^h We have assumed that each respondent will take 20 hours to review the startup, shutdown, malfunction report.