

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal),
EPA ICR Number 1158.10, OMB Control Number 2060-0156

1(b) Short Characterization/Abstract

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

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. This standard requires performance test of Method 25 and an annual report of Method 24 results to verify VOC content of water-based sprays. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Monitoring requirements specific to rubber tire manufacturing plants provide information on the operation of the emissions control device and compliance with the VOCs standards. Semiannual reports of excess emissions are required. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

There are approximately 41 rubber tire manufacturing plants are currently subject to the standard. It is estimated that there will be no industry growth over the next three years. Although some plants may conduct operational changes, these changes will not trigger

applicability of this rule. We are also assuming that all plants are now using the water-based sprays that meet the NSPS green tire spray limits without having to use add-on control equipment.

There are approximately 41 rubber tire manufacturing plants in the United States, which are all publicly owned and operated by the rubber tire manufacturing industry. None of the 41 facilities in the United States are owned by either, state, local, tribal or the Federal government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal). The Federal government burden associated with the review of reports submitted by respondent is shown below in Table 2: Average Annual EPA Burden - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal).

The active (previous) Information Collection Requests (ICR) had the following “Terms of Clearance (TOC):

As part of its submission, EPA should verify that the wage rate referenced in sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and Office of Management and Business (OMB) guidelines.

EPA has addressed the TOC. The wage rates referenced in Sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner or

operator subject to any requirement of this Act to:

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

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

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. In addition, the collected information is 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 tests, 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment in compliance with the regulation.

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

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart BBB.

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 (75 FR 30813) on June 2, 2010. 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. Approximately 41 respondents will be subject to the standard over the three-year period covered by this ICR.

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, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAIC Codes

The respondents to the recordkeeping and reporting requirements are rubber tire manufacturing. The United States Standard Industrial Classification (SIC) code for the respondent affected by the standard is 3011, which corresponds to the North American Industry Classification System (NAICS) code 326211 for Tire Manufacturing (except Retreading).

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

A source must make the following reports:

Notifications	
Notification to construct/reconstruct	60.7(a)(1)
Notification of anticipated startup	60.7(a)(2)
Notification of actual startup	60.7(a)(3)
Initial performance test results	60.8(a)

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

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

A source must keep the following records:

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

Electronic Reporting

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.
Install, calibrate, maintain, and operate a temperature monitoring device with a continuous recorder, an organics monitoring device with a continuous recorder to detect the concentration level of organic compounds, or a recovery device, as applicable.
Perform initial performance test, Reference Method 24 test or formulation data analysis for the determination of the VOC content of cements or green tire spray materials. Method 25A for the determination of the VOC concentration if using a control device, Method 2 for the determination of the flow rate at the stack gas, monthly performance test or formulation data analysis of the spray material, and repeat performance test if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**5(a) Agency Activities**

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, 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 two 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 - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 13,323 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

Managerial	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "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) Cost

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ¹	(G) Total O&M, (E X F)
VOC (organics) monitor	\$35,000	0	\$0	\$7,500	0	\$0
Temperature monitors at thermal and catalytic incinerators	\$7,500	0	\$0	\$4,000	4.1	\$16,400
Total			\$0			\$16,400

¹ An estimated 10 percent of respondents use a temperature monitor

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 \$16,400. 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 \$16,400.

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 \$18,823.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 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 - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 41 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 ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	4.1	4.1	36.9	4.1	41
2	4.1	4.1	36.9	4.1	41

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
3	4.1	4.1	36.9	4.1	41
Average	4.1	4.1	36.9	4.1	41

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 41.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of Method 25A test	3	1	0	3
Report of physical/operational changes	4.1	1	0	4.1
Notification of change in spray materials formulation	4.1	1	0	4.1
Semiannual report of excess emissions	13.7	2	0	27.4
Annual report of formulation data/Method 24	41	1	0	41
Total Number of Annual Responses			Total	79.6

The number of Total Annual Responses is 79.6 (rounded up to 80 Total Annual responses for statistical purposes).

The total annual labor costs are \$1,250,076. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 13,323. Details regarding these estimates may be found below in Table1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing

(40 CFR Part 60, Subpart BBB) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 166 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$16,400.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 418 labor hours at a cost of \$18,823. See below Table 2: Average Annual Agency Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal).

6(f) Reasons for Change in Burden

There is no increase in the number of affected facilities, labor hours, or the number of responses compared to the previous ICR.

There is however, an increase in the estimated labor burden cost as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program change. The change in the labor burden cost estimates has occurred because we updated the labor rates, which resulted in an increase in labor costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 166 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-2010-0366. 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-2010-0366 and OMB Control Number 2060-0156 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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	1	1	1	0	0	0	0	\$0
B. Required activities ^c								
Initial performance test ^d	240	5	1,200	0	0	0	0	\$0
Repeat initial performance test ^d	240	1	240	0	0	0	0	\$0
^e Monitoring of VOC emissions and operations	1	252	252	41	10,332	516.6	1,033.2	\$1,114,817.63
Monthly performance tests ^{e,j}	2	12	24	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Initial performance test results	2	1	2	0	0	0	0	\$0
Notification of Method 25A test ^f	4	1	4	3	12	0.6	1.2	\$1,294.79
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Report of physical operational changes ^g	4	2	8	4.1	32.8	1.64	3.28	\$3,538.91
^h Report of spray materials/formulation change	4	2	8	4.1	32.8	1.64	3.28	\$3,538.91
Semiannual reports ⁱ	10	2	20	13.7	274	13.7	27.4	\$29,564.46
Annual report of formulation data/Method 24 Results ^j	4	1	4	41	164	8.2	16.4	\$17,695.52
Subtotal for Reporting Requirements					12,474.74			
4. Recordkeeping requirements								
A Read instructions	See 3A							
B Plan activities	See 3B							

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
C Implement activities	See 3B							
D Develop record system	N/A							
E Time to enter and transmit information ^k								
Record of startup, shutdown, and malfunction	0.5	36	18	41	738	36.9	73.8	\$79,625.40
Records of monthly performance test	See 3B							
Records of emissions and operations	See 3B							
F Time to train personnel	N/A							
G Time for audits	N/A							
Subtotal for Recordkeeping Requirements						848.7		
					11,585.6	579.28	1,158.56	\$1,250,075.62
TOTAL LABOR BURDEN AND COST (rounded)						13,323.44 13,323 (rounded)		\$1,250,076

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources one of which mixes only rubber compound. There will be no additional sources over the three-year period of this ICR. In addition, we have not included the reporting requirements burden for affected facilities exemptions under 40 CFR '60.676(d) in the table because their occurrence is very rare in practice.

^b This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2010, 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 the rubber tire manufacturing plants will not construct or reconstruct an affected facility, however, they will conduct operational changes on 10 percent of the affected operations.

^d We have assumed that there will be no new sources expected over the three-year period of this ICR.

^e Sources are required to monitor and record monthly performance tests, VOC use, the number of days in each compliance period, control device efficiency, formulation data or the results of Method 24 test analysis conducted to verify the VOC content of the spray, monitoring device data and other operational data such as the number of tires processed. We have assumed that sources will operate approximately 252 days per year or 36 weeks. We have further assumed that the burden incurred to record these items is one hour per occurrence since much of the required information would be currently recorded by the industry with or without regulation.

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

^g We have assumed that 10 percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/operational change by adding a green tire spray booth or a new line.

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

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

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

^k We have assumed that there will be two occurrences of startup, shutdown, and/or malfunction per source per month which will yield an average of 18 occurrences per source per respondent (36 weeks).

Table 2: Average Annual EPA Burden - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Report of performance test results ^c	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of Method 25A test ^d	8	1	8	3	24	1.2	2.4	\$1,243.78
Notification of change in spray materials formulation ^e	2	1	2	4.1	8.2	0.41	0.82	\$424.96
Semiannual reports ^f	4	2	8	13.7	109.6	5.48	10.96	\$5,679.97
Annual report of formulation data/Method 24 test results ^g	5	1	5	41	205	10.25	20.5	\$10,624.02
Report of physical/operational changes ^h	4	1	4	4.1	16.4	0.82	1.64	\$849.92
Subtotals Labor Burden and cost					363.2	18.16	36.32	\$18,822.65
TOTAL LABOR BURDEN AND COST (rounded)						418		\$18,823

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources one of which mixes only rubber compound. There will be no additional 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: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

^c We have assumed that there will be no new sources expected over the three-year period of this ICR

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

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

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

^g We have assumed that all existing sources will submit an annual Method 24 test report or an annual formulation data report to verify the VOC content of each tread end cement and green tire spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources will continue to use HAP materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing any add on control devices. The remaining

plants use only water-based sprays and are not required to do monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence per source due to the nature of the control equipment used and its intermittent use.

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