SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal), EPA ICR Number 2274.03, OMB Control Number 2060-0606

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS)for **Clay Ceramics Manufacturing, Glass Manufacturing and Secondary Nonferrous Metals Processing Area Sources** (40 CFR 63, subparts RRRRRR (Clay Ceramics Manufacturing), SSSSS (Glass Manufacturing), and TTTTTT (Secondary Nonferrous Metals Processing)) were proposed on September 20, 2007, and promulgated on December 26, 2007 (72 FR 73180). This information is being collected to assure compliance with each of these subparts.

In general, all NSPS 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 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 U. S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 51 facilities will be subject to the NESHAP for the Clay Ceramics Manufacturing area source category, 21 facilities subject to the NESHAP for the Glass Manufacturing area source category, and 10 facilities subject to the NESHAP for the Secondary Nonferrous Metals Processing area source category.

You can find the burden to the "Affected Public" listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources. The Federal government burden is attributed entirely to work performed by Federal employees or government contractors, and can be found listed below in Table 2: Annual Burden and Cost to the Agency - NESHAP for Clay

Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

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 hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, HAP emissions from clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for these source category at 40 CFR 63, subparts RRRRRR, SSSSS, and TTTTTT.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which where promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

The notifications required in the standards are used to inform the Agency or delegated

authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the standards are being met. The performance test may also be observed.

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 63, subparts RRRRRR, SSSSS, and TTTTTT.

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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility System) which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 51 respondents will be subject to the NESHAP for the Clay Ceramics Manufacturing area source category; 21 respondents will be subject to the NESHAP for the Glass Manufacturing area source category; and 10 respondents will be subject to the NESHAP for the Secondary Nonferrous Metals Processing area source category 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.

The final rules were developed in consultation with individual companies, state agencies, and trade associations. The non-EPA persons consulted on the information collection activities were:

Contact	Applicable subpart	Organization	Telephone number
Greg Andrews	Subpart RRRRRR	R.T. Vanderbilt Co., Ceramic Manufacturers of America (CerMA)	(203) 853-1400
Eric Astrachan		Tile Council of North America (TCNA)	(864) 646-8453
Todd Barson		Ferro Corp., CerMA	(216) 750-6432
Mike Cassidy		Kohler Co.	(920) 457-4441, ext. 77263
Bob Hurt		Dal-Tile Corp.	(214) 309-4891
Myra Warne		Society of Glass and Ceramic Decorators, CerMA	(740) 588-9882
Steve Wiederwax		American Marazzi Tile, Inc.	(972) 226-0110
John Brown	Subpart SSSSSS	Glass Manufacturing Industry Council (GMIC)	(614) 818-9423
Marshall Bullard		Automotive Components Holdings	
Joe Kane		Corning Inc.	(607) 974-9000
Kurt Kissling		Pepper Hamilton LLP	(313) 393-7313
Patricia Pride		PPG Industries, Inc.	(412) 492-5278
Phil Ross		Glass Packaging Institute (GPI)	(949) 493-7293
Pamela Rygalski		Pilkington NA	(910) 276-5630
Michael Turnbull		Guardian Industries	(248) 340-2227
John Bullock	Subpart TTTTTT	International Precious Metals Institute	(203) 784-3181
Merideth Curren		Pease & Curren, Inc.	(401) 739-6350
Roger Fumey		Atlas Pacific Corporation	(909) 421-1200
Christopher Kiser		Magretech, Inc.	(216) 518-9165
James Mallory		Non-Ferrous Founders' Society	(847) 299-0950
George Phillips		Sipi Metals Corp.	(773) 276-0070
Charles Tatakis		Metalor Technologies USA Refining Corp.	(508) 699-8800, ext. 224

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the 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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent the Part 70 permit program and the five-year statute of limitations on which the permit program is based. 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 five years. In addition, 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are benzene emissions from coke by-product recovery plants. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) codes are found in the following table:

Standard	SIC Codes	NAICS Codes
40 CFR 63, subpart RRRRRR	3253, 3261, 3262, 3263, 3269, 3299, 5719	327111, 327112, 327122
40 CFR 63, subpart SSSSS	3211, 3229, 3221	327211, 327212, 327213
40 CFR 63, subpart TTTTTT	3341, 3399	331492, 331423

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, 40 CFR part 61, subpart V, and 40 CFR part 61, subpart A.

(i) Data Items

In this ICR, all the data that is recorded or reported is required by 40 CFR 63, subparts RRRRRR, SSSSS, and TTTTTT

A source for clay ceramics manufacturing must meet the following requirements:

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Monitoring			
Kiln peak temperature	§63.11440(a)	§63.11440(a)	NA
APCD parameter check	NA	§63.11440(b)(1)	NA
Visible emissions test	NA	§63.11440(b)(2)	NA
APCD inspection	§63.11440(c)(1)	NA	NA
Alternative monitoring technique	Table 1 to subpart RRRRRR / §63.11440(c)(2)	Table 1 to subpart RRRRRR / §63.11440(b)(3)	40 CFR 63.8(f)
Notifications			
Notification of applicability	Table 1 to subpart RRRRRR / §63.11442(a)	Table 1 to subpart RRRRRR / §63.11442(a)	40 CFR 63.9(a)(2)
Notification of construction/reconstruction	NA	NA	40 CFR 63.9(b)(5)
Notification of special compliance requirements	Table 1 to subpart RRRRRR	Table 1 to subpart RRRRRR	40 CFR 63.9(d)
Notification of performance test	NA	NA	40 CFR 63.9(e)
Notification of opacity/VE observations	NA	NA	40 CFR 63.9(f)

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Additional CMS notifications	NA	NA	40 CFR 63.9(g)
Notification of compliance status	Table 1 to subpart RRRRRR / §63.11442(b)	Table 1 to subpart RRRRRR / §63.11442(b)	40 CFR 63.9(h)
Notification of changes in information	Table 1 to subpart RRRRRR	Table 1 to subpart RRRRRR	40 CFR 63.9(j)
Plans			
SSM plan	NA	NA	40 CFR 63.6(e)(3)
Performance test plan	NA	NA	40 CFR 63.7(c)(2)
CMS quality control plan	NA	NA	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	NA	40 CFR 63.8(e)(3)
Records			
Records of notifications	Table 1 to subpart RRRRRR / 63.11443(a)(1)	Table 1 to subpart RRRRRR / 63.11443(a)(1)	40 CFR 63.10
Monitoring/inspection information	Table 1 to subpart RRRRRR / 63.11443(a)(2)	Table 1 to subpart RRRRRR / 63.11443(a)(2)	40 CFR 63.10
Reports			
Reports of deviation	NA	NA	NA
Semiannual monitoring reports	NA	NA	NA
Initial/repeat performance tests	NA	NA	40 CFR 63.7(e)(1)/40 CFR 63.6(h)(7)
Quality assurance test plan	NA	NA	40 CFR 63.7(c)
CMS performance evaluation/report	NA	NA	40 CFR 63.8(e)(5)
SSM reports	NA	NA	40 CFR 63.6(e)(3)
Excess emissions reports	NA	NA	40 CFR 63.10(e)(3)

A source for glass manufacturing must meet the following requirements:

Requirement	Citation for existing sources	Citation for new sources	Part 63 General Provisions citation
Monitoring			
Furnace ESP secondary voltage and current	§63.11454(b)	§63.11454(d)	N/A
Furnace fabric filter inlet temperature	§63.11454(c)	§63.11454(e)	N/A
Notifications			
Notification of applicability	§63.11456(a)	§63.11456(a)	40 CFR 63.9(b)
Notification of construction/reconstruction	N/A	N/A	40 CFR 63.9(b)(5)
Notification of special compliance requirements	N/A	N/A	40 CFR 63.9(d)
Notification of performance test	N/A	N/A	40 CFR 63.9(e)
Notification of opacity/VE observations	N/A	N/A	40 CFR 63.9(f)
Additional CMS notifications	N/A	N/A	40 CFR 63.9(g)
Notification of compliance status	§63.11456(b)	§63.11456(b)	40 CFR 63.9(h)
Notification of changes in information	N/A	N/A	40 CFR 63.9(j)
Plans			
SSM plan	N/A	N/A	40 CFR 63.6(e)(3)
Performance test plan	N/A	N/A	40 CFR 63.7(c)(2)
CMS quality control plan	N/A	N/A	40 CFR 63.8(d)
CMS performance evaluation test plan	N/A	N/A	40 CFR 63.8(e)(3)
Records			
Records of notifications	§63.11457(a)(1)	§63.11457(a)(1)	40 CFR 63.10
Records of startups, shutdowns and malfunctions	N/A	N/A	40 CFR 63.10
Records that demonstrate continuous compliance	§63.11457(a)(3)	§63.11457(a)(3)	40 CFR 63.10
Records of glass production	§63.11457(a)(4)	§63.11457(a)(4)	40 CFR 63.10
Monitoring/inspection information	§63.11457(a)(5) - (8), §63.11457(c)	§63.11457(a)(5) - (8), §63.11457(c)	40 CFR 63.10
Reports			
Reports of deviation	N/A	N/A	N/A
Semiannual monitoring reports	N/A	N/A	N/A
Initial/repeat performance tests	N/A	N/A	40 CFR 63.7(e)(1) / 40 CFR 63.6(h)(7)

Requirement	Citation for existing sources	Citation for new sources	Part 63 General Provisions citation
Quality assurance test plan	N/A	N/A	40 CFR 63.7(c)
CMS performance evaluation/report	N/A	N/A	40 CFR 63.8(e)(5)
SSM reports	N/A	N/A	40 CFR 63.6(e)(3)
Excess emissions reports	N/A	N/A	40 CFR 63.10(e)(3)

A source for secondary nonferrous metals processing must meet the following requirements:

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Monitoring			
Visual inspection of capture device	§63.11466(a)	§63.11466(a)	NA
Visible emissions check	§63.11466(b)	NA	NA
Visual bag inspection	§63.11466(b)	NA	NA
Bag leak detection system	NA	§63.11466(c)	NA
Notifications			
Notification of applicability	Table 1 to subpart TTTTTT / §63.11469(a)	Table 1 to subpart TTTTTT / §63.11469(a)	40 CFR 63.9(a)(2)
Notification of construction/reconstruction	NA	NA	40 CFR 63.9(b)(5)
Notification of special compliance requirements	Table 1 to subpart TTTTTT	Table 1 to subpart TTTTTT	40 CFR 63.9(d)
Notification of performance test	NA	NA	40 CFR 63.9(e)
Notification of opacity/VE observations	NA	NA	40 CFR 63.9(f)
Additional CMS notifications	NA	NA	40 CFR 63.9(g)
Notification of compliance status	Table 1 to subpart TTTTTT / §63.11469(b)	Table 1 to subpart TTTTTT / §63.11469(b)	40 CFR 63.9(h)
Notification of changes in information	Table 1 to subpart TTTTTT	Table 1 to subpart TTTTTT	40 CFR 63.9(j)
Plans			
SSM plan	NA	NA	40 CFR 63.6(e)(3)
Performance test plan	NA	NA	40 CFR 63.7(c)(2)
CMS quality control plan	NA	NA	40 CFR 63.8(d)

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
CMS performance evaluation test plan	NA	NA	40 CFR 63.8(e)(3)
Records			
Records of notifications	Table 1 to subpart TTTTTT / §63.11470(a)(1)	Table 1 to subpart TTTTTT / §63.11470(a)(1)	40 CFR 63.10
Monitoring/inspection information	Table 1 to subpart TTTTTT / §63.11470(a)(2)	Table 1 to subpart TTTTTT / §63.11470(a)(2)	40 CFR 63.10
Reports			
Reports of deviation	NA	NA	NA
Semiannual monitoring reports	NA	NA	NA
Initial/repeat performance tests	NA	NA	40 CFR 63.7(e)(1)/40 CFR 63.6(h)(7)
Quality assurance test plan	NA	NA	40 CFR 63.7(c)
CMS performance evaluation/report	NA	NA	40 CFR 63.8(e)(5)
SSM reports	NA	NA	40 CFR 63.6(e)(3)
Excess emissions reports	NA	NA	40 CFR 63.10(e)(3)

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 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.
Initial notification of applicability.
Notification of compliance status.
Create information on compliance status.
Gather existing information on compliance status.
Write report for notification of compliance status.
Plan recordkeeping activities.
Implement recordkeeping activities.
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
Review notifications and reports, including performance test reports, initial notification of applicability, and notification of compliance status.
Attend performance tests.

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

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

5(c) Small Entity Flexibility

The Small Business Administration defines a small entity as a firm having no more than 500 to 750 employees for Clay Ceramics Manufacturing, less than 750 to 1,000 employees for Glass Manufacturing, and less than 750 employees for Secondary Nonferrous Metals Processing depending on the size definition for the affected NAICS code. There will not be adverse impacts on any small entities in the Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing area source categories. The final Clay Ceramics Manufacturing rule does not create any new requirements or burdens for existing sources other than minimal notification requirements. The final Glass Manufacturing rule will require additional costs for 21 glass manufacturing facilities, but only three of those facilities will be expected to install control devices and incur costs beyond those associated with annual inspections of control devices; only one of these facilities is a small business. The final Secondary Nonferrous Metals Processing rule does not create any new requirements or burdens for existing sources other than minimal notification requirements.

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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 industries for the subparts 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.

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

We combined the three burdens from the previous ICR into one burden estimate. The average annual burden to industry over the next three years from these recordkeeping and

reporting requirements is estimated to be 1,763 hours for clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources combined. Glass manufacturing is expect to contribute all of the burden while the other two industries are not expected to experience any additional burden from the current requirements. The recordkeeping hours shown below in Table 1 are 1,763. There are no reporting hours for activities shown in 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	$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

For clay ceramics manufacturing and secondary nonferrous metals processing, the only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs. For glass manufacturing, the type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

For clay ceramics manufacturing and secondary nonferrous metals processing, the only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

For glass manufacturing, the capital/startup and operation and maintenance costs are summarized in the following table:

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Cost Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B×C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E×F)
Performance Tests	$8,740	0	$0	$2,130	1	$2,130
Monitoring Equipment	$5,603	0	$0	$800	1	$800
File Cabinets	$235	0	$0	$25.71	7	$180
Other O&M	-	-	-	-	-	$9,854
TOTAL	$14,578		$0	$2,955.71		$12,964

There are no capital/startup costs for the three years covered by this ICR.

The total operation and maintenance (O&M) costs for this ICR are $12,964. 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 $12,964.

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.

We combined the three agency burdens from the previous ICR into one burden estimate The average annual Agency cost during the three years of the ICR is estimated to be $1,329 for clay ceramics manufacturing, glass manufacturing area sources, and secondary nonferrous metals processing. Glass manufacturing is expect to contribute all of the burden while the other two industries are not expected to contribute any burden to the agency from the current requirements.

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. These rates can be obtained from the OPM web site, http//www.opm.gov/oca/payrates/index/htm. Details upon which this estimate is based appear below in Table 2: Annual Burden and Cost to the Agency - NESHAP for Clay

Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 51 existing respondents will be subject to the clay ceramics manufacturing area source standard; 21 existing respondents will be subject to the glass manufacturing area source standard; and 10 existing respondents will be subject to the secondary nonferrous metals processing area source standard. It is estimated that no additional respondents will become subject for either of the standards. The overall average number of respondents, as shown in the table below is 51 for clay ceramics manufacturing area sources, 21 for glass manufacturing area sources, and 10 for secondary nonferrous metals processing area sources.

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

Number of Respondents for Clay Ceramics Manufacturing Area Sources

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [a]	(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	51	0	0	51
2	0	51	0	0	51
3	0	51	0	0	51
Average	0	51	0	0	51

Assumptions:

[a] New respondents include sources with constructed, reconstructed, and modified affected facilities. In this standard, existing respondents submit initial notifications.

Number of Respondents for Glass Manufacturing Area Sources

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [a]	(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	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21

Assumptions:

[a] New respondents include sources with constructed, reconstructed, and modified affected facilities. In this standard existing respondents submit initial notifications.

Number of Respondents for Secondary Nonferrous Metals Processing Area Sources					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [a]	(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	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

Assumptions:

[a] New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 51 for clay ceramic manufacturing area sources, 21 for glass manufacturing area sources, and 10 for secondary nonferrous metals processing area sources.

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

Total Annual Responses for Clay Ceramics Manufacturing Area Sources				
(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
Keeps records	0	0	n/a[a]	0
			Total (rounded)	0

[a] No responses are required for this activity after the first three years.

Total Annual Responses for Glass Manufacturing Area Sources				
(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
Keeps records	0	0	14	14
			Total (rounded)	14

Total Annual Responses for Secondary Nonferrous Metals Processing Area Sources				
(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
Keeps records	0	0	n/a[a]	0
			Total (rounded)	0

[a] No responses are required for this activity after the first three years.

The number of Total Annual Responses is 14, and attributable to glass manufacturing area sources. No responses are required from ceramics manufacturing and nonferrous metals manufacturing area sources.

The total annual labor costs are $165,416 for clay ceramic manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources. All labor costs for this ICR are attributable to impact on the glass manufacturing area sources. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 summarized below.

(i) Respondent Tally

The total annual labor costs are $165,416 for clay ceramic manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources. All labor costs for this ICR are attributable to impact on the glass manufacturing area sources. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 126 hours per response for clay ceramic manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources. All burden for this ICR is attributable to impact the glass manufacturing area sources.

The total annual capital/startup and O&M cost to the regulated entities for glass manufacturing area sources are $12,964. There are no capital/startup or O&M costs to the clay ceramics manufacturing and the secondary nonferrous metals processing area sources.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years for clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources is estimated to be 18 labor hours at a cost of $1,329. All burden and costs are attributable to impact on the glass manufacturing area sources. See below Table 2: Annual Burden and Cost to the Agency - NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated labor hour burden as currently identified in the OMB Inventory of Approved ICR Burdens because the rule is now fully implemented. This increase is not due to any program changes.

The previous ICR covered the initial phase of standard implementation which occurred over a three-year period. Hence, the average number of respondents during the initial phase is less than the number of respondents when the standard is fully implemented. This ICR shows the labor hour and cost burden after full implementation.

The increase in cost to Respondents and the Agency is due to full implementation of the rule and use of current labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 126 hours per response for clay ceramic manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources. All burden is expected to be attributable to impact on the glass manufacturing area sources. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA 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–2010–0352. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft

collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA–HQ–OECA–2010–0352 and OMB Control Number 2060-0606 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 CLAY CERAMICS MANUFACTURING, GLASS MANUFACTURING, AND SECONDARY NONFERROUS METALS PROCESSING AREA SOURCES (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal).

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A×B)	(D) Respondents per year	E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost, $ [a]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquis., Install., and Util. of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions [b]	2	1	2	0	0	0	0	$0
B. Required activities								
Initial notification of applicability [c]	2	1	2	0	0	0	0	$0
Notification of compliance status [d]	4	1	4	0	0	0	0	$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Subtotal Reporting						*0*		*$0*
5. Recordkeeping Requirements								
A. Read instructions [e]	2	1	2	0				$0
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Record data [f, m]	0.1	1,095	109.5	14	1,533	76.7	153.3	$165,415.73
E. Time to transmit or disclose information [g,m]	0.25	3.3	0.8	0	0	0	0	$0
F. Time to train personnel [h,m]	12	1	12	0	0	0	0	$0
G. Time for audits[m]	N/A							
Subtotal Recordkeeping						*1,763*		*$165,416*
TOTAL LABOR BURDEN AND COST						1,763		$165,416
TOTAL NUMBER OF ANNUAL RESPONSES [i]				14				
ANNUAL CAPITAL COSTS[j]								$0
ANNUALIZED CAPITAL COSTS [k]								
Performance tests (5 yr life, 7% interest; CRF =0.2439)								$2,130
Monitoring equipment (10 yr life, 7% interest; CRF =0.1424)								$800

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A×B)	(D) Respondents per year	E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost, $ [a]
File cabinets (15 yr life, 7% interest; CRF =0.1098)								$180
Total annualized capital								$3,110
TOTAL ANNUAL COSTS (O&M) [l]								$9,854
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$12,964**

Assumptions:

N/A = Not applicable.

[a] This ICR uses the following labor rates: $116.05 for managerial labor, $97.21 for technical labor, and $48.87 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.

[b] There are an estimated 21 existing glass manufacturing facilities, 51 clay manufacturing facilities, and 10 secondary nonferrous metals processing facilities that use HAP metals. Only existing facilities are expected to Read Instruction and no new facilities are expected in either industry..

[c] After full implementation, existing facilities are not longer required to submit an Initial Notification.

[d] After full implementation, existing facilities are not longer required to submit Notifications of Compliance Status.

[e] After full implementation, existing facilities are not longer required to keep records of the notifications and other records.

[f] It is assumed that 13 of the 27 affected furnaces can meet the emission limit without installation of a control device. It is assumed that each of the remaining 14 affected furnaces have automatic monitoring and recording systems.

[g] Since Initial Notification and Notifications of Compliance Status are not expected for existing facilities after full implementation, transmittal of these items is not expected.

[h] After full implementation, training is not expected to occur at existing facilities.

[i] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 4E.

[j] No new sources are expected and all existing sources have fully implemented capital costs to comply with the current standards. Therefore, no additional capital/start-up costs are expected.

[k] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. CRF=(i)×(1+i)^t/((1+i)^t-1) where i = interest rate (%) and t = equipment life (years).

[l] Costs of annual inspections of emission control systems, assuming 8 hr per inspection for each of the 14 affected furnaces with a control device.

[m] Because the data are already collected by respondents as required by the existing permit requirements, no costs or burden are associated with these information collection activities for clay ceramics manufacturing and secondary nonferrous metals processing.

TABLE 2.: ANNUAL BURDEN AND COST TO THE AGENCY--NESHAP FOR CLAY CERAMICS MANUFACTURING, GLASS MANUFACTURING, AND SECONDARY NONFERROUS METALS PROCESSING AREA SOURCES (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal).

Burden item	(A) Person-hours per occurrence	(B) Occurrences per respondent	(C) EPA person-hours/year (C=A×B)	(D) Facilities per year	(E) Technical person-hours/year (E=C×D)	(F) Management person-hours/year (F=0.05×E)	(G) Clerical person-hours/year (G=0.1×E)	(H) Cost, $ [a]
Attend performance test [b]	16	1	16	1	16	0.8	1.6	$829
Report Review:								
Initial notification of applicability [c]	2	1	2	0	0	0	0	$0
Notification of performance test [d]								
Notification of compliance status [e]	4	1	4	0	0	0	0	$0
TOTAL BURDEN AND COST (SALARY)					16	0.8	1.6	$829
Travel expenses for tests attended[f]								$500
TOTAL BURDEN AND COST					18			$1,329

Assumptions:

[a] This ICR uses the following average hourly labor rates: $62.27 for managerial (GS-13, Step 5, $38.92×1.6), $46.21 (GS-12, Step 1, $28.88×1.6) for technical and $25.01 (GS-6, Step 3, $15.63×1.6) for clerical. 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.

[b] Assumes Agency personnel will attend the performance test for one affected source per year. This only applies for glass manufacturing area sources.

[c] After full implementation, existing facilities are not required to submit Initial Notifications..

[d] Not required

[e] After full implementation, existing facilities are not required to submit Notifications of Compliance Status.

[f] Assumes Agency personnel (1 person) will spend 2 days per plant, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.