

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), EPA ICR Number 1976.05, OMB Control Number 2060-0509

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production (40 CFR part 63, subpart WWWW) were proposed on August 2, 2001 (66 FR 40323), promulgated on April 21, 2003 (68 FR 19375), and amended on August 25, 2005 (70 FR 50117). These regulations apply to existing facilities and new facilities with reinforced plastic composites (RPC) production operations and processes. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart WWWW.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/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 U. S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 552 respondents per year will be subject to the standard, and 16 additional respondents per year will become subject to the standard.

The active ICR had the following Terms of Clearance (TOC):

When this ICR is renewed, EPA should review the respondent burden, universe, response number, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC. The respondent burden, universe,

response number, labor rates, and capital cost have been thoroughly checked and all estimates updated.

The “Affected Public” is owners and operators of RPC facilities. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed either by Federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

## **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, hazardous air pollutant (HAP) emissions from RPC production facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart WWWW.

### **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. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual 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 63, subpart WWWW.

#### **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 (76 FR 26900) on May 9, 2011. 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, in compliance with the recordkeeping and reporting provisions in the standard, 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 on 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: 1) the American Composites Manufacturer's Association, at (703) 682-1656; and 2) the University of Delaware Center for Composite Materials, at (302) 831-8149.

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.

### **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 to occur.

### **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 either 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 owners or operators of RPC manufacturing facilities. The U. S. Standard Industrial Classification (SIC) codes for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed below.

Standard (40 CFR Part 63, Subpart WWWW)	SIC Codes	NAICS Codes
Custom Compounding of Purchased Plastics Resins	3087	325991
Plastics Pipe and Pipe Fitting Manufacturing	3084, 3089	326122
Plastics Plumbing Fixture Manufacturing	3088	326191
All Other Plastics Product Manufacturing	3999, 3089	326199
Cut Stone and Stone Product Manufacturing	3281	327991
Motor Vehicle Body Manufacturing	3711, 3713, 3714	336211
Motor Home Manufacturing	3716	336213
Travel Trailer and Camper Manufacturing	3792, 3799	336214

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW).

A source must make the following reports:

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

<b>Notification Reports</b>	
Request for an extension of compliance with relevant standard	63.9(c)

<b>Reports</b>	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(6)(d)
Performance test results	63.10(d)(2), 63.5755
Startup, shutdown and malfunction plan	63.6(e)(3), 63.5758(d)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i), 63.5758
Progress reports for compliance extension (if applicable)	63.6(i)1
Semiannual compliance reports	63.5758(b-c)

A source must keep the following records:

<b>Recordkeeping</b>	
Startup, shutdown and malfunction plan	63.6(e)(3)
All reports and notifications	63.10(b)(1)
Records of startup, shutdown, and malfunction of process equipment	63.10(b)(2)(i), (iv, v)
Records of malfunctions of air pollution control equipment	63.10(b)(2)(ii)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	63.10(b)(3)
Records of maintenance of air pollution control equipment	63.10(b)(2)(iii)
Records of flow monitoring system performance evaluations, malfunctions, calibrations, and adjustments	63.10(b)(2)(vi, vii, viii, ix, x, and xi), 63.10(c)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	63.10(b)(2)(xii)
Documentation of initial notifications	63.10(b)(2)(xiv)
Five-year retention of records	63.10(b)(1), 163.5764(b)

### 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**

<b>Respondent Activities</b>
Read instructions.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide 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.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

**5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS 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/operator for five years.

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

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

The Agency may not conduct or sponsor, and a person is not required to respond to, a

collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 19,312 (Total Labor Hours from Table 1 below). 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	\$121.42 (\$57.82 + 110%)
Technical	\$99.14 (\$47.21 + 110%)
Clerical	\$49.81 (\$23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "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 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 monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent <sup>1</sup>	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Response <sup>2</sup>	(F) Number of Responses	(G) Total O&M, (E X F)
N/A	0	0	0	\$20.13	1,173	23,612

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
					Total	23,612

<sup>1</sup> This ICR assumes all existing sources are in compliance with initial rule requirements and that the monitoring devices are integral parts of the control devices necessary to determine whether these sources are operating properly

<sup>2</sup> We have estimated that file storage and photocopying costs per response cost one hour of clerical labor at \$12.50. First class postage is estimated at \$7.63 per response for mailing to regulatory agencies.

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 \$23,612. 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 \$23,612. These are the recordkeeping costs.

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

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, 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 \$158,749.

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), 2011 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 and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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 520 existing respondents will be subject to the standard. It is estimated that an additional 16 respondents per year will become subject. The overall average number of respondents, as shown in the table below is 552 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	16	520	0	0	536
2	16	536	0	0	552
3	16	552	0	0	568
Average	16	536	0	0	552

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

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 552.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC) +D
Notification of compliance status	16	1	0	16
Notification/application of construction	16	1	0	16
Notification of actual startup	16	1	0	16
Notification of performance test and test plan	2	1.2	0	2.4
Report of performance test results	2	1.2	0	2.4
Report of exceedances	110.4	2	0	220.8
Report of no exceedances	441.6	2	0	883.2
Report of startup, shutdown, malfunction	16	1	0	16
<b>Total</b>				<b>1,172.8</b>

The number of Total Annual Responses is 1,173 (rounded).

The total annual labor costs are \$1,850,478. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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

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

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

The total annual labor hours are 19,312 at a cost of \$1,850,478. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$23,612. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

The average annual Agency burden and cost over next three years is estimated to be 3,523 labor hours at a cost of \$158,749. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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

There is an increase in burden hours to the both the respondents and the Agency as compared to the most recently approved ICR. The increase is due to industry growth in the past three years, resulting in additional number of respondents that are subject to this standard. The growth in respondent universe also results in an increase in the total O&M costs.

In addition, there is an increase in burden costs to both the respondent and the Agency due to an adjustment in labor rates. This ICR uses the most recent labor rates from the Bureau of Labor Statistics in calculating the labor costs.

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

The annual public reporting and recordkeeping burden for this collection of information

is estimated to average 16 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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-2011-0257. 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-2011-0257 and OMB Control Number 2060-0509 in any correspondence.

### **Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions:								
i. Facilities with 4 groups of operations	12	1	12	14.88	178.56	8.93	17.86	\$19,675.88
ii. Facilities with 5 groups of operations	13	1	13	1.12	14.56	0.73	1.46	\$1,604.40
B. Required activities: Sources with add-on controls								
i. Initial performance test <sup>c</sup>	320	1	320	2	640	32	64	\$70,522.88
ii. Repeat of performance test	320	1	320	0.40	128	6.4	12.8	\$14,104.58
iii. Operation, maintenance, monitoring plan	40	1	40	2	80	4	8	\$8,815.36
iv. Startup, shutdown, malfunction plan	20	1	20	2	40	2	4	\$4,407.68
v. Monitoring of operating parameters and equipment <sup>d</sup>	Included in 5E							
C. Gather Existing Information	Included in 5D, 5E							
D. Write report <sup>a, c</sup>								
i. Notification of compliance status	4	1	4	16	64	3.2	6.4	\$7,052.29
ii. Notification of construction/ reconstruction <sup>a</sup>	2	1	2	16	32	1.6	3.2	\$3,526.14
iii. Notification of actual startup	2	1	2	16	32	1.6	3.2	\$3,526.14
iv. Notification of performance test	2	1	2	2	4	0.2	0.4	\$440.77

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 <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
v. Reports of performance test results	Included in 4B							
vii. Report of exceedances <sup>f</sup>	16	2	32	110.40	3,532.80	176.64	353.28	\$389,286.30
viii. Report of no exceedances	8	2	16	441.60	7,065.6	353.28	706.56	\$778,572.60
ix. Startup, shutdown, malfunction report <sup>g</sup>	2	1	2	16	32	1.6	3.2	\$3,526.14
Reporting Subtotal						13,620.05		\$1,305,061.16
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system (spreadsheets): <sup>h</sup>								
i. System for low HAP resin	4	1	4	14	56	2.8	5.6	\$6,170.75
ii. System for work practices	1	1	1	16	16	0.8	1.6	\$1,763.07
iii. System for add-on control devices	2	1	2	2	4	0.2	0.4	\$440.77
E. Time to enter and transmit all information into record system <sup>h</sup>								
i. Enter information on low HAP resin	10	1	10	438	4,380	219	438	\$482,640.96
ii. Enter information on work practices and operating parameters	N/A							
F. Develop operator training course and keep records of operators taken it	10	1	10	16	160	8	16	\$17,630.72
G. Time to train personnel:								
i. Small facilities (less than 100 employees)	2	1	2	13.12	26.24	1.31	2.62	\$2,891.44
	0.4	1	0.4	452.64	181.06	9.05	18.11	\$19,950.92
ii. Medium facilities (100-250 employees)	4	1	4	1.76	7.04	0.35	0.70	\$775.75
	0.8	1	0.8	60.72	48.58	2.43	4.86	\$5,352.69

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 <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
iii. Large facilities (more than 250 employees)	8	1	8	1.12	8.96	0.45	0.90	\$987.32
	1.6	1	1.6	38.64	61.82	3.09	6.18	\$6,812.51
H. Time for audits	N/A							
Recordkeeping Subtotal						5,692.15		\$545,416.90
<b>TOTAL LABOR BURDEN AND COST (Rounded)</b>						<b>19,312</b>		<b>1,850,478</b>

**Assumptions:**

<sup>a</sup> There is an average of 536 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be an average of 16 new RPC facilities each year over the three year period of this ICR of which 93 percent (or 14.9) will consist of facilities with 4 groups of operations and 7 percent of facilities with 5 groups of operations. There is an average of 552 existing respondents per year over the next three year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$121.42 per hour for Executive, Administrative, and Managerial labor; \$99.14 per hour for Technical labor, and \$49.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1: "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> 1New respondents have to comply with the initial rule requirements including notifications and performance tests. We have assumed that two new respondents per year will install add-on controls equipment and therefore, will be require to conduct an initial performance test. We have assumed that performance tests are repeated by 20 percent of the respondents.

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

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

<sup>f</sup> We have assumed that approximately 80 percent of the 552 existing respondents will report no excess emissions twice a year and approximately 20 percent will report no excess emissions twice a year.

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

<sup>h</sup> New respondents (16) have to develop a record system. In addition, existing RPC facilities have to record operational data. In general, the following monitoring is required: 1) facilities with open molding and/or centrifugal casting operations (396 existing and 14 new each year or an average of 438 per year) would have to record for low HAP resins; 2) facilities with add-on controls (12 existing and 2 new or an average of 16 RPCs per year) would have to record add-on control devices operating parameters; and 3) all facilities (552) need to keep records of its work practices. Since operating parameters for control equipment and standard work practices are already monitored by industry for other purposes, we are not attributing these burdens to the rule.

<sup>i</sup> We have assumed that the amount of time it takes a respondent to train its employees would vary with the number of employees at its facility. We have also assumed that the distribution in size of the new respondents would be identical to that of the existing PRC universe. Therefore, we have assumed that 82 percent of the respondents would be small business (i.e., 452.6 RPCs existing and 13.1 new RPC per year), 11 percent (i.e. 60.7 existing RPCs and 1.8 new RPCs per year), would be medium business, and 7 percent (i.e., 38.6 existing RPCs and 1.1 new RPCs) are large business. Furthermore, we have assumed that respondents will be providing full training to new employees only. Therefore, it will take existing respondents to train its new employees 20 percent of the time it takes new respondents to train all employees, assuming the same size business .

Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)

Burden item	(A) Person hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Notification of applicability <sup>a</sup>	2	1	2	2	4	0.2	0.4	\$207.30
Notification of intent to construct a major source and review application	12	1	12	16	192	9.6	19.2	\$9,950.30
Notification of start of construction	2	1	2	16	32	1.6	3.2	\$1,658.38
Notification of actual startup	2	1	2	16	32	1.6	3.2	\$1,658.38
Notification of initial performance test and test plan	12	1.2	14.4	2	28.8	1.44	2.88	\$1,492.55
Report of performance test results including operating parameters	12	1.2	14.4	2	28.8	1.44	2.88	\$1,492.55
Notification of compliance status	2	1	2	16	32	1.6	3.2	\$1,658.38
Review reports of excess emissions <sup>c</sup>	4	2	8	110.4	883.2	44.16	88.32	\$45,771.40
Review reports of no excess emissions <sup>c</sup>	2	2	4	441.6	1,766.4	88.32	176.64	\$91,542.80
Review of startup, shutdown, malfunction report <sup>d</sup>	4	1	4	16	64	3.2	6.4	\$3,316.77
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>3,523</b>		<b>\$158,749</b>

Assumptions:

<sup>a</sup> There is an average of 536 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be an average of 16 new RPC facilities each year over the three year period of this ICR. Therefore, there is an average of 552 existing respondents per year over the next three year period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small business, 11 percent are medium size facilities and 7 percent are large facilities. Furthermore, we have assumed that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of five groups of operations.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.27 (GS-13, Step 5, \$35.01 x 1.6), Technical rate of \$46.21 (GS-12, Step 1, \$25.98 x 1.6), and Clerical rate of \$25.01 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2011 General Schedule", which excludes locality rates of pay.

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

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