SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal), EPA ICR Number 1964.06, OMB Control Number 2060-0496.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wet-formed Fiberglass Mat Production were: proposed on May 26, 2000, promulgated on April 11, 2002, and most-recently amended on April 20, 2006. The most recent amendment revises two citations and does not modify any reporting or recordkeeping burden. These regulations apply to new and existing component processes at industrial facilities that manufactured wet-formed fiberglass mat, including: preparation of glass fibers, formation of fibers into a fiberglass mat, saturation with urea-formaldehyde binder solution, curing and drying the binder-coated fiberglass mat, cooling the mat, and trimming, cutting, and packaging. 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 HHHH.

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.

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

Over the next three years, an average of 14 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these standards.

The Office of Management and Budget (OMB) approved the currently active ICR

without any "Terms of Clearance."

The "Affected Public" is owners and operators of wet-formed fiberglass mat production facilities. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal). The Federal Government "burden" is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 component process at industrial facilities manufacturing wet-formed fiberglass mats 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 HHHH.

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 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. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart HHHH.

3(a) Nonduplication

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, duplication does not exist.

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 (79 FR 30117) on May 27, 2014. 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 Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO is EPA's 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 standards as they were being developed. In developing this ICR, we contacted: 1) the Nonwoven Engineers and Technologist (NET), which is a division of the Technical Association of the Pulp and Paper Industry (TAPPI), at (828) 439-3226; and 2) GAF, at (972) 851-0408.

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.

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 with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond 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 these standards 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 facilities that produce wet-formed fiberglass mat, which serves as the substrate for several roofing products. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3329325, a subset of SIC 3329, Pressed and Blown Glass, Not Elsewhere Classified. This code corresponds to the North American Industry Classification System (NAICS) 327212 for Non-woven Fabric Mills.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH).

A source must make the following reports:

Notifications	
Initial notification requirements	63.9(b)(1)
Notification of compliance status when a source becomes subject to the standard	63.9(h), 63.3000(b)
Notification that source is subject to special compliance requirements, if applicable	63.9(d)
Notification of performance test	63.7(b), 63.9(e)
Rescheduled of performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Change in information already provided	63.9(j)
Request for an extension of compliance with relevant standard	63.9(c)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(6)(d)
Performance test results	63.10(d)(2), 63.3000(d)

Reports	
Startup, shutdown and malfunction plan	63.6(e)(3)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i), 63.3000(e)
Progress reports for compliance extension (if applicable)	63.6(i)
Semiannual compliance reports	63.3000(b)

A source must keep the following records:

Recordkeeping	
Startup, shutdown and malfunction plan	63.6(e)(3)
All reports and notifications	63.10(b)(1)
Records of startup, shutdown, and malfunction of process equipment	63.10(b)(2)(i), (iv-v)
Records of malfunctions of air pollution control equipment	63.10(b)(2)(ii)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	63.10(b)(3)
Records of maintenance of air pollution control equipment	63.10(b)(2)(iii)
Records of flow monitoring system performance evaluations, malfunctions, calibrations, and adjustments	63.10(b)(2)(vi-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), 63.2999(a)

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.

(ii) Respondent Activities

Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1, 2, and 316 tests, and repeat performance tests 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.
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
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 Integrated Compliance Information System (ICIS) and ECHO.

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 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. 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 reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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. Two of the 14 existing facilities subject to this NESHAP are classified as small businesses under the Small Business Administration definition (750 or fewer company employees). 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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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. Where appropriate, specific tasks and

major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,839 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$129.93 ($61.87 + 110%)
Technical	$103.97 ($49.51 + 110%)
Clerical	$51.79 ($24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor cost. There are no capital/startup or operation and maintenance 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 $23,000.

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

Managerial	$62.90 (GS-13, Step 5, $39.31 + 60%)
Technical	$46.67 (GS-12, Step 1, $29.17 + 60%)
Clerical	$25.25 (GS-6, Step 3, $15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2015 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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 14 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 14 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New 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	0	14	0	0	14
2	0	14	0	0	14
3	0	14	0	0	14
Average	0	14	0	0	14

[1] New respondents 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 14.

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
Initial notifications	0	5	0	0
Notification of 5-year performance test	2.8	1	0	2.8
Performance test reports	2.8	1	0	2.8
Semiannual compliance reports	14	2	0	28
Startup, shutdown and malfunction reports	2	2	0	4
			Total	37.6

The number of Total Annual Responses is 38.

The total annual labor costs are $285,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,800. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of

information is estimated to average 75 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $0. 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 500 labor hours at a cost of $23,000. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

6(f) Reasons for Change in Burden

There is a small adjustment decrease in burden from the previous ICR because we have modified the calculation methodology associated with the 5-year repeat performance test requirement. The previous ICR assumed all 14 sources will have to conduct the performance test during the ICR renewal period. Since this requirement only occurs once every five years, we have revised the estimates to reflect this frequency: (14 sources) / (5 years) = 2.8 sources per year. This results in a decrease in the respondent burden.

There is also an increase of 6 responses due to a correction. The previous ICR did not account for the 5-year performance test notifications and reports in calculating the number of responses.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 75 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-2014-0079. 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), WJC 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-2014-0079 and OMB Control Number 2060-0496 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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) No. Of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	1	1	1	0	0	0	0	$0
B. Required activities:								
i. Initial performance tests: [c]	200	1	200	0	0	0	0	$0
ii. 5-year performance test [c]	221	1	221	2.8	618.8	30.94	61.88	$71,561.44
iii. Repeat of performance test [c]	221	1	221	0.56	123.76	6.19	12.38	$14,312.29
iv. Monitoring of operations and equipment: [d]	See 5E							
v. Operation, maintenance, monitoring plan	40	1	40	0	0	0	0	$0
vi. Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	$0
D. Gather Existing Information	See 4B, and 5E							
E. Write report [a, c]								
i. Notification of compliance status	2	1	2	0	0	0	0	$0
ii. Notification of actual startup	2	1	2	0	0	0	0	$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	$0
iv. Notification of performance test	2	1	2	2.8	5.6	0.28	0.56	$647.61

Burden item	(A) Person-hours per occurrence	(B) No. Of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
v. Notification of actual startup	2	1	2	0	0	0	0	$0
vi. Reports of performance test	4	1	4	2.8	11.2	0.56	1.12	$1,295.23
vii. Report of monitoring exceedances [e]	16	2	32	11.2	358.4	17.92	35.84	$41,447.35
viii. Report of no excess emission [e]	8	2	16	2.8	44.8	2.24	4.48	$5,180.92
ix. Startup, shutdown, malfunction report [f]	8	2	16	2	32	1.6	3.2	$3,700.66
Subtotal for Reporting Requirements						***1,374***		***$138,145.49***
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system	N/A							
E. Time to enter and transmit all information required by the rule [g]	1.75	52	91	14	1,274	63.7	127.4	$147,332.37
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						***1,465***		***$147,332.37***
TOTAL LABOR BURDEN AND COSTS (Rounded) h&i						2,838.8 **2,839**		$285,477.86 **$285,478**
Capital and O&M Cost (see Section 6(b)(iii)):								**$0.00**
TOTAL COST:								**$285,478**

Assumptions:

[a] There are an estimated 14 respondents (i.e., wet-formed fiberglass mat production facilities), 13 with one production line and one with two lines, which are subject to this standard. We have assumed that there will be no new lines constructed over the three year period of this ICR.

[b] This ICR uses the following labor rates: $129.93 per hour for Executive, Administrative, and Managerial labor; $103.97 per hour for Technical labor, and $51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2.Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation". The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

[c] We have assumed that all sources are in compliance with initial rule requirements including the initial performance test. The rule requires a performance test every five years since the initial test was conducted. We have estimated that each performance test will take approximately 21 hours to complete it since sources will be using EPA Method 316 to measure formaldehyde and applicable test methods specified in the NESHAP to determine resin free-formaldehyde content and the loss-on-ignition of the fiberglass mat. In addition, we have assumed that it will take approximately 200 hours to conduct the pretest survey, equipment calibration, and sample analysis and report preparation for a total of 221 hours per performance test. We have further assumed that 20 percent of the performance tests fail and will have to be repeated. There are an estimated 14 respondents. On average each year, the number of respondents conducting the performance test is 2.8 (14 / 5 = 2.8).

[d] Monitoring of operations include: 1) monitoring operating parameters for control equipment (i.e., thermal oxidizer or other control equipment); 2) urea-formaldehyde (UF) resin solids application rate; 3) resin-free formaldehyde content; 4) loss-on-ignition; 5) UF-to-latex ratio in the binder; 6) weight of the final mat product per roofing square; and 7) average nonwoven wet-formed fiberglass mat production rate (roofing square per hour).

[e] We have assumed that approximately 80 percent of the 14 respondents (or 11.2) will report no excess emissions twice a year and approximately 20 percent (or 2.8) will report no excess emissions twice a year.

[f] We have assumed that 2 of the 14 facilities will have a startup, shutdown or malfunction (SSM) that is not managed according to the SSM plan.

[g] We have assumed it takes each source approximately 1.75 hours per week to record and transmit the information and that a year will consist of 52 weeks.

h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

i The numbers used in the text for the final totals should be rounded values.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 (Ex0.10)	(H) Cost, $ [b]
Initial Notifications: applicability, performance test, compliance status [a]	2	3	6	0	0	0	0	$0
Notifications: 5-year performance test, compliance status [b]	2	1	2	2.8	5.6	0.28	0.56	$293.10
Review reports of excess emissions [c]	16	2	32	11.2	358.4	17.92	35.84	$18,758.66
Review reports of no excess emissions [c]	8	2	16	2.8	44.8	2.24	4.48	$2,344.83
Review of startup, shutdown, malfunction report [d, e]	8	2	16	2	32	1.6	3.2	$1,674.88
TOTAL ANNUAL BURDEN AND COST						506.9		$23,071.47
(rounded) f, g						**507**		**$23,071**

Assumptions:

[a] There are an estimated 14 respondents (i.e., wet-formed fiberglass mat production facilities), 13 with one production line and one with two lines, which are subject to this standard. We have assumed that all sources are in compliance with initial rule requirements and that there will be no new lines constructed over the three year period of this ICR.

[b] The rule requires a performance test every five years since the initial test was conducted, which is applicable for this ICR renewal. The number of respondents that will conduct the performance test, averaged over the 3-year period of this ICR, is 4.67 (14 / 3 = 4.67).

[c] We have assumed that approximately 80 percent of the 14 respondents (or 11.2) will report no excess emissions twice a year and approximately 20 percent (or 2.8) will report no excess emissions twice a year.

[d] We have assumed that two of 14 respondents per year will have a startup, shutdown, or malfunction occurrence that is not managed according to the plan.

[e] 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 $62.90 (GS-13, Step 5, $39.31 + 60%), Technical rate of $46.67 (GS-12, Step 1, $29.17 + 60%), and Clerical rate of $25.25 (GS-6, Step 3, $15.78 + 60%). These rates are from the Office of Personnel Management (OPM) "2015 General Schedule" which excludes locality rates of pay.

f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

g The numbers used in the text for the final totals should be rounded values.