Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR P

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
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. Familiazrization with rule requirements:			
i. Facilities with 4 groups of operations	12	1	12
ii. Facilities with 5 groups of operations	13	1	13
B. Required activities: Sources with add-on controls			
i. Initial performance test [c]	320	1	320
ii. Repeat of performance test	320	1	320
iii. Operation, maintenance, monitoring plan	40	1	40
iv. Startup, shutdown, malfunction plan	20	1	20
v. Monitoring of operating parameters and equipment [d]	See 5E		
C. Gather Existing Information	See 5D, 5E		
D. Write report [a, c]			
i. Notification of compliance status	4	1	4
ii. Notification of construction/ reconstruction [a]	2	1	2
iii. Notification of actual startup	2	1	2
iv. Notification of performance test	2	1	2
v. Reports of performance test results	See 4B		
vii. Report of exceedances [f]	16	2	32
viii. Report of no exceedances	8	2	16
ix. Startup, shutdown, malfunction report [g]	2	1	2
Subtotal for Reporting Requirements			
5. Recordkeeping Requirements			
A. Read instructions	See 4A		
B. Plan activities	See 4B		
C. Implement activities	See 4B		
D. Develop record system (spreadsheets): [h]			
i. System for low HAP resin	4	1	4
ii. System for work practices	1	1	1
iii. System for add-on control devices	2	1	2
E. Time to enter and transmit all information into record system [h]			
i. Enter information on low HAP resin	10	1	10
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
G. Time to train personnel:			
i. Small facilities (less than 100 employees)	2	1	2
	0.4	1	0.4

ii. Medium facilities (100-250 employees)	4	1	4
	0.8	1	0.8
iii. Large facilities (more than 250 employees)	8	1	8
	1.6	1	1.6
H. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (Rounded):			
Capital and O&M Cost (see Section 6(b0(iii)):			
TOTAL COST:			

Assumptions:

[a] There is an average of 584 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW over the three year period of this ICR of which 93 percent (or 14.88) will consist of facilities with 4 groups of operations an 600 total respondents per year over the next 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 p from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2: Civilian Workers, by Occupa rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

[c] New respondents have to comply with the initial rule requirements including notifications and performance tests. We hav and therefore, will be require to conduct an initial performance test. We have assumed that performance tests are repeated b

[d] Monitoring and recordkeeping of operations for respondents with enclosures and add-on control devices include: 1) specifi 2) start-up, shutdown, and malfunctions of equipment, and 3) work practices.

[e] Monitoring and recordkeeping of operations for respondents that comply by limiting the HAP content of their raw material material and the weighted-average HAP content over the past 12 months, and 2) work practices. However, if all the materia to record HAP content and would not need to track monthly consumption or record the computations. For open molding an among thirteen different processes (open molding) and two different processes (centrifugal casting to calculate the monthly centrifugal casting operations).

[f] We have assumed that approximately 80 percent of the 600 (or 480) existing respondents will report no excess emissions t year.

[g] We have assumed that all RPC facilities with add-on controls (18 existing and 2 new each year or an average of 22) will h according to the SSM plan.

[h] New respondents (16) have to develop a record system. In addition, existing RPC facilities have to record operational dat and/or centrifugal casting operations (466 existing and 14 new each year or an average of 480 per year) would have to recor average of 22 RPCs per year) would have to record add-on control devices operating parameters; and 3) all facilities (600) n equipment and standard work practices are already monitored by industry for other purposes, we are not attributing these bu

[i] We have assumed that he amount of time it takes a respondent to train its employees would vary with the number of empl respondents would be identical to that of the existing PRC universe. Therefore, we have assumed that 82 percent of the resp year), 11 percent (i.e. 64.24 existing RPCs and 1.76 new RPCs per year), would be medium business, and 7 percent (i.e., 40 assumed that respondents will be providing full training to new employees only. Therefore, to train existing respondents, it

art 63, Subpart WWWW) (Renewal)

	103.97	129.93	51.79	
(D)	(E)	(F)	(G)	(H)
Respondents per year [a]	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, $ [b]
14.88	178.56	8.93	17.86	$20,649.66
1.12	14.56	0.73	1.46	$1,683.80
2	640	32	64	$74,013.12
0.4	128	6.4	12.8	$14,802.62
2	80	4	8	$9,251.64
2	40	2	4	$4,625.82
16	64	3.2	6.4	$7,401.31
16	32	1.6	3.2	$3,700.66
16	32	1.6	3.2	$3,700.66
2	4	0.2	0.4	$462.58
120	3840	192	384	$444,078.72
480	7680	384	768	$888,157.44
22	44	2.2	4.4	$5,088.40
	14,694			***$1,477,616.43***
14	56	2.8	5.6	$6,476.15
16	16	0.8	1.6	$1,850.33
2	4	0.2	0.4	$462.58
480	4800	240	480	$555,098.40
16	160	8	16	$18,503.28
13.12	26.24	1.312	2.624	$3,034.54
478.88	191.55	9.58	19.16	$22,152.13

1.76	7.04	0.35	0.70	$814.14
64.24	51.39	2.57	5.14	$5,943.25
1.12	8.96	0.45	0.90	$1,036.18
40.88	65.41	3.27	6.54	$7,564.14
	6,195			***$622,935.13***
	20,900			***2,100,000***
				476,000
				2,580,000

/. We have assumed that there will be an average of 16 new RPC facilities each year
d 7 percent (or 1.12) of facilities with 5 groups of operations. There is an average of

ıer hour for Technical labor, and $51.79 per hour for Clerical labor. These rates are
tional and Industry group." The rates are from column 1: "Total Compensation." The

e assumed that two new respondents per year will install add-on controls equipment
ıy 20 percent of the respondents.

ic operating parameters for each control device established during the performance test,

ls include: 1) monitoring and recording in a spreadsheet the monthly consumption of
ıls in an operation meet the HAP content limit, then each respondent would need only
d centrifugal casting operations, respondents would also have the option of averaging
average of the actual and allowable emissions for the combined open molding and

:wice a year and approximately 20 percent (or 120) will report excess emissions twice a

ıave at least one startup, shutdown or malfunction (SSM) that is not managed

:a. In general, the following monitoring is required: 1) facilities with open molding
d for low HAP resins; 2) facilities with add-on controls (18 existing and 2 new or an
ıeed to keep records of its work practices. Since operating parameters for control
ırdens to the rule.

oyees at its facility. We have also assumed that the distribution in size of the new
ɔondents would be small business (i.e., 478.88 RPCs existing and 13.12 new RPC per
.88 existing RPCs and 1.12 new RPCs) are large business. Furthermore, we have
will take 20 percent of the time it takes to train new employees.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
Notification of applicability [a]	2	1	2
Notification of intent to construct a major source and review application	12	1	12
Notification of start of construction	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test and test plan	12	1.2	14.4
Report of performance test results including operating parameters	12	1.2	14.4
Notification of compliance status	2	1	2
Review reports of excess emissions [c]	4	2	8
Review reports of no excess emissions [c]	2	2	4
Review of startup, shutdown, malfunction report [d]	4	1	4
TOTAL ANNUAL BURDEN AND COST (rounded)			

Assumptions:

[a] There is an average of 584 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpar the three year period of this ICR. Therefore, there is an average of 600 total respondents per year over the next th business, 11 percent are medium size facilities and 7 percent are large facilities. Furthermore, we have assumed t percent will consist of five groups of operations.

[b] This cost is based on the following labor rates: Managerial rate of $62.90 (GS-13, Step 5, $39.31 + 60%), Tech + 60%). These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which exclud packages available to government employees.

[c] We have assumed that approximately 80 percent (or 480) of the respondents will report no excess emissions tw

[d] We have assumed that all RPC facilities with add-on controls (18 existing and 2 new each year or an average o according to the plan.

s Production (40 CFR Part 63, Subpart WWWW) (Renewal)

		46.67	62.9	25.25
(D)	(E)	(F)	(G)	(H)
Respondents per year [a]	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, $ [b]
2	4	0.1	0.4	$203.07
16	192	0.8	19.2	$9,495.76
16	32	0.8	3.2	$1,624.56
16	32	0.8	3.2	$1,624.56
2	28.8	0.1	2.88	$1,423.11
2	28.8	0.1	2.88	$1,423.11
16	32	0.8	3.2	$1,624.56
120	960	6	96	$47,604.60
480	1920	24	192	$95,964.00
22	88	1.1	8.8	$4,398.35
	3,680			**$165,000**

rt WWWW. We have assumed that there will be an average of 16 new RPC facilities each year over
ıree year period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small
hat 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7

ınical rate of $46.67 (GS-12, Step 1, $29.17 + 60%), and Clerical rate of $25.25 (GS-6, Step 3, $15.78
ɗes locality rates of pay. The rates have been increased by 60 percent to account for the benefit

ice a year and approximately 20 percent (or 120) will report excess emissions twice a year.

ɔf 22) will have at least one startup, shutdown, or malfunction occurrence that is not managed