

**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, Subpart RRRRRR, SSSSSS and TTTTTT) (Renewal), EPA ICR Number 2274.05, OMB Control Number 2060-0606.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS and TTTTTT) were proposed on September 20, 2007, and promulgated on December 26, 2007. These regulations apply to the following existing and new facilities: 1) clay ceramics manufacturing facilities that process more than 50 tons per year (tpy) of wet clay and are an area sources of hazardous air pollutants (HAP); 2) glass manufacturing facilities that do not have the potential to emit any single HAP at a rate of 10 tpy or more (or any combination of HAP at a rate 25 tpy or more), and use continuous furnaces to produce glass that contains HAP as raw materials; and 3) secondary nonferrous metals processing facilities that are area sources of HAP. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subparts RRRRRR, SSSSSS and TTTTTT.

Clay ceramics manufacturing facilities include facilities that manufacture pressed tile, sanitaryware, dinnerware, or pottery with an atomized glaze spray booth or kiln that fires glazed ceramic ware. Glass manufacturing facilities include facilities that manufacture flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials, to produce molten glass and form the molten glass into sheets, containers, or other shapes. Secondary nonferrous metals processing facilities means brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plants that use furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders.

In general, all NESHAP standards require initial notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such 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.

The “Affected Public” are owners and operators of clay ceramics manufacturing facilities, glass manufacturing facilities and secondary nonferrous metals processing facilities. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA’s regulations. The “burden” to the Affected Public may be found 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). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The Federal Government’s burden may be found below in Table 2: Average Annual EPA 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).

Based on our consultations with industry representatives, there is an average of one affected facility at each clay ceramics and secondary non-ferrous metals processing plant site and 1.3 affected facilities at each glass manufacturing 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, approximately 51 clay ceramics manufacturing facilities, 21 glass manufacturing facilities and 10 secondary nonferrous metals processing per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. Because the compliance date for each standard has passed, all existing facilities are expected to have complied with initial requirements.

The Office of Management and Budget (OMB) approved the currently active 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 either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subparts RRRRRR, SSSSSS 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 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these 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, leaks are being detected and repaired and these standards are being met. The performance test may also be observed.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subparts RRRRRR, SSSSSS 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, 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 (80 FR 32116) on June 5, 2015. 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 Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) Tile Council of North America (TCNA), at (864) 646-8453 (eastrachan@tileusa.com); and 2) Glass Manufacturing Industry Council (GMIC), at (614) 818 9423 (rwlipetz@gmic.org).

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 these 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 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 clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals processing area sources. The United States Standard Industrial Classification (SIC) codes for the respondents affected, and their corresponding North American Industry Classification System (NAICS) codes, are found in the following table:

Standard (40 CFR Part 63, Subpart RRRRRR)	SIC Codes	NAICS Codes
Pottery, Ceramics, and Plumbing Fixture Manufacturing	3261, 3262, 3263, 3264, 3269, 3299, 5719	327110
Clay Building Material and Refractories Manufacturing	3251, 3253, 3255, 3259, 3297	327120
Standard (40 CFR Part 63 Subpart SSSSSS)	SIC Codes	NAICS Codes
Flat Glass Manufacturing	3211	327211

Other Pressed and Blown Glass and Glassware Manufacturing	3229	327212
Glass Container Manufacturing	3221	327213
Standard (40 CFR Part 63 Subpart TTTTTT)	SIC Codes	NAICS Codes
Secondary Smelting, Refining and Alloying of Nonferrous Metal (except Copper and Aluminum)	3341, 3399	331492
Copper Rolling, Drawing, Extruding, and Alloying	3341, 3351, 3357, 3399	331420

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT).

A source must make the following reports:

Notifications	
Standard (40 CFR Part 63, Subpart RRRRRR)	
Initial notification	63.11441(a), 63.9(b)(2)
Notification of applicability	63.9(a)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of compliance status	63.11441(b), 63.9(h)
Notification of changes in information	63.9(j)
Request for extension of compliance	63.9(c)
Standard (40 CFR Part 63, Subpart SSSSSS)	
Initial notification	63.11456(a), 63.9(b)
Notification of applicability	63.9(a)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of compliance status	63.11456(b), 63.9(h)
Notification of changes in information	63.9(j)
Request for extension of compliance	63.9(c)
Standard (40 CFR Part 63, Subpart TTTTTT)	
Initial notification	63.11469(a), 63.9(b)(2)
Notification of applicability	63.9(a)

Notifications	
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of compliance status	63.11469(b), 63.9(h)
Notification of changes in information	63.9(j)
Request for extension of compliance	63.9(c)

Reports	
Standard (40 CFR Part 63, Subpart RRRRRR)	
Initial/repeat performance tests	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)
Standard (40 CFR Part 63, Subpart SSSSSS)	
Initial/repeat performance tests	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)
Standard (40 CFR Part 63, Subpart TTTTTT)	
Initial/repeat performance tests	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)

A source must keep the following records:

Recordkeeping	
Standard (40 CFR Part 63, Subpart RRRRRR)	
Records of notifications	63.11442(a)(1)
Records of measurements needed to document compliance	63.11442(a)(2)
Monitoring/inspection information	63.11440(d)
SSM plan	63.6(e)(3)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan	63.8(e)(3)
Standard (40 CFR Part 63, Subpart SSSSSS)	

Recordkeeping	
Records of notifications	63.11457(a)(1)
Records of startups, shutdowns and malfunctions	63.10(b)(2)
Records that demonstrate continuous compliance	63.11457(a)(3)
Records of glass production	63.11457(a)(4)
Monitoring/inspection information	63.11457(a)(5-8), 63.11457(c)
Monitoring: Furnace ESP secondary voltage and current	63.11454(b) (existing sources), 63.11454(d) (new sources)
Monitoring: Furnace fabric filter inlet temperature	63.11454(c) (existing sources), 63.11454(e) (new sources)
SSM plan	63.6(e)(3)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan	63.8(e)(3)
All required CMS measurements	6.10(c)(1)
Periods of excess emissions	6.10(c)(7),(8)
Standard (40 CFR Part 63, Subpart TTTTTT)	
Records of notifications	63.11470(a)(1)
Monitoring/inspection information	63.11470(a)(2)
Monitoring: Visual inspection of capture device	63.11468(a)(1)(i) (existing sources)
Monitoring: Visible emissions check	63.11468(a)(2) (existing sources)
Monitoring: Visual bag inspection	63.11468(a)(1)(ii) (existing sources)
Monitoring: Bag leak detection system	63.11468(c) (new sources)
SSM plan	63.6(e)(3)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan	63.8(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.

(ii) 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 EPA Method 1 or 1A; 2, 2A, 2C, 2F, or 2G; 3, 3A, or 3B; 4; 5 or 17; 22 test, 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.

Agency Activities
Attend performance tests.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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 standards 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 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

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. 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 requires 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.

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 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 industry for each of 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. 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 1,810 (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	\$138.43 (\$65.92 + 110%)
Technical	\$106.45 (\$450.69 + 110%)
Clerical	\$52.77 (\$25.13+ 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “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 area sources and secondary nonferrous metals processing area sources, there are no capital/startup or operation and maintenance costs.

For glass manufacturing area sources, 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 monitor(s) and other costs such as photocopying and postage.

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

For both clay ceramics manufacturing facilities and secondary nonferrous metals processing facilities, 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) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent ^a	(C) Number of New Respondents	(D) Total Capital/Startu p Cost ^b (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Performance Tests	\$8,740	0	\$0	\$0	0	\$0
Monitoring Equipment	\$5,603	0	\$0	\$0	0	\$0
File Cabinets	\$235	0	\$0	\$0	0	\$0
Inspection of Emission Control Systems ^c	\$0	0	\$0	\$703.86	14	\$9,854
Total ^d			\$0			\$9,850

^a Annualized capital costs are \$2,130 per performance test, \$800 per monitoring equipment, and \$26 per file cabinet. Costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = (i) \times (1+i)^t / ((1+i)^t - 1)$, where i = interest rate (%) and t = equipment life (years). Performance tests: 5 yr life, 7% interest; $CRF = 0.02439$; Monitoring equipment: 10 yr life, 7% interest; $CRF = 0.1424$; File Cabinets: 15 yr life, 7% interest; $CRF = 0.1098$

^b No new sources are expected and all existing sources have fully implemented capital costs to comply with thte current standards. Therefore, no additional capital/start-up costs are expected.

^c We estimate 21 glass manufacturing facilities with 27 affected furnaces. It is assumes that 13 of the 27 furnaces can meet the emission limit without installation of a control device. It is assumes that each of the remaining 14 affected furnaces have automotive monitoring and recording systems. We assumes annual inspections of emission control systems, 8 hr per inspection

for each of the 14 affected furnaces with a control device.

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$9,850. 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 \$9,850. These are 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 \$1,350.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 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 per year will become subject. The overall average number of respondents, as shown in the table below, is 82 per year (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					
	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)
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)					
1	0	51	0	0	51
2	0	51	0	0	51
3	0	51	0	0	51
Average	0	51	0	0	51
Glass Manufacturing Area Sources (Subpart SSSSSS)					
1	0	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)					
1	0	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10
Average Total	0	82	0	0	82

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 82 (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 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	(E) Total Annual Responses E=(BxC)+D

Total Annual Responses				
			Not Submit Reports	
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)				
Keeps Records	0	0	N/A ¹	0
Total				0
Glass Manufacturing Area Sources (Subpart SSSSSS)				
Keeps Records	0	0	14 ²	14
Total				14
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)				
Keeps Records	0	0	N/A ¹	0
Total				0
			Total Responses for All Area Sources	14

¹ No responses are required for this activity after the first three years

² We estimate 21 glass manufacturing facilities with 27 affected furnaces. Of these, 14 furnaces have automatic monitoring and recording systems.

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

The total annual labor costs are \$187,000. 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 and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 1,810. Details regarding these estimates may be found 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).

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 129 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$9,850. 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 18 labor hours at a cost of \$1,350. See below in Table 2: Average Annual EPA 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).

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 an adjustment increase in respondent labor hours and costs in this ICR from the most recently approved ICR. This is not due to any program changes. The increase occurred because this ICR assumes all existing respondents will take some time each year to re-familiarize with the regulatory requirements. Additionally, there is a small decrease of \$4 in the estimated O&M cost due to rounding. This ICR rounds all calculated burden and costs to three significant digits. There is no change in the methodology or assumptions used to calculate the O&M cost.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 129 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 neither conduct nor 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-2013-0355. 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-2013-0355 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 (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year	(E) Technica l Hours per Year (E=CxD)	(F) Managemen t Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year ^a
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Reporting Requirements								
A. Familiarize with regulatory requirements ^b	2	1	2	21	42	2.1	4.2	\$4,983.24
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 for Reporting Requirements					48			\$4,983
5. Recordkeeping Requirements								
A. Familiarize with regulatory requirements ^e	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Record data ^{f,i}	0.1	1,095	109.5	14	1,533	76.65	153.3	\$181,888.15

E. Time to transmit or disclose information ^{g,i}	0.25	3.3	0.83	0	0	0	0	\$0
F. Time to train personnel ^{h,i}	12	1	12	0	0	0	0	\$0
G. Time for audits ⁱ	N/A							
Subtotal for Recordkeeping Requirements						1,763		\$181,888
TOTAL LABOR BURDEN AND COST (rounded) ^j						1,810		\$187,000
TOTAL CAPITAL AND O&M COST (rounded) ^j								\$9,850
GRAND TOTAL (rounded) ^j								\$197,000

Assumptions:

^a This ICR uses the following labor rates: \$138.43 for managerial labor, \$106.45 for technical labor, and \$52.77 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 existing clay manufacturing facilities, and 10 existing secondary nonferrous metals processing facilities that use HAP metals. We assume all existing respondent will have to re-familiarize with regulatory requirements each year. No new facilities are expected in any of the industries.

^c After full implementation, existing facilities are no longer required to submit an Initial Notification.

^d After full implementation, existing facilities are no longer required to submit Notifications of Compliance Status.

^e After full implementation, existing facilities are no longer required to keep records of the notifications.

^f We estimate 21 glass manufacturing facilities with 27 affected furnaces. 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 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.

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

Table 2: Average Annual EPA 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)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year ^a
Attend performance test ^b	16	1	16	1	16	0.8	1.6	\$854.46
Report review:								
Initial notification of applicability ^c	2	1	2	0	0	0	0	\$0.00
Notification of performance test ^d								
Notification of compliance status ^e	4	1	4	0	0	0	0	\$0.00
Travel expenses for tests attended ^f								\$500
TOTAL ANNUAL BURDEN (rounded) ^g						18		\$1,350

Assumptions:

^a This ICR uses the following average hourly labor rates: \$64.16 for managerial (GS-13, Step 5, \$40.10×1.6), \$47.62 (GS-12, Step 1, \$29.76×1.6) for technical and \$25.76 (GS-6, Step 3, \$16.10×1.6) for clerical. These rates are from the Office of Personnel Management (OPM), 2016 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.

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