

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU)
(Renewal), EPA ICR Number 0661.12, OMB Control Number 2060-0002.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) were proposed on November 18, 1980, promulgated on August 6, 1982 and most-recently amended on February 27, 2014. The 2014 amendment corrects an error in the value of the particulate matter standards for saturated felt or smooth-surfaced roll roofing. These regulations apply to both existing and new saturator and each mineral handling and asphalt storage facility at asphalt roofing manufacturing plants and to asphalt storage tanks and blowing stills at asphalt processing plants, petroleum refineries, and asphalt roofing plants. 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 60, Subpart UU.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least two 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.

All asphalt processing and roofing manufacturing facilities in the United States are owned and operated by the asphalt processing and roofing manufacture industry. 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 inquiries. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (Renewal). The Federal Government’s “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 – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (Renewal).

Based on our consultations with industry representatives, there are an average of 4 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, approximately 144 respondents per year will be subject to these standards, and 2 respondents per year will undergo reconstruction and become new sources subject to these same standards.

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

In accordance with 5 CFR 1320, the information collection is approved for three years. In future collections, costs and time burden estimates should be rounded to the appropriate number of significant digits. If "reading instructions" are provided as potential time or cost burdens, then the location of the instructions or the instructions themselves should be provided. Also, the burden for refreshing on instructions should be included, as appropriate. Any detailed tables should be provided in excel format along with or in lieu of detailed tables provided within the supporting statement.

EPA has addressed each item of concern in the TOC by rounding all cost and burden totals to 3 significant figures; replacing the "reading instructions" activity with a "familiarizing with the regulatory requirements" activity that is required for all new and existing respondents; and including detailed burden tables in a Microsoft Excel spreadsheet that accompanies this supporting statement.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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, particulate matter (PM) emissions from asphalt processing and roofing manufacture either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart UU.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these 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 these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these 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 that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

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 (82 FR 29552) on June 29, 2017. 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 the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the Asphalt Institute at, (859) 288-4960; and 2) the Asphalt Roof Manufacturers Association (ARMA), at (202) 591-2450.

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.

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 asphalt processing and roofing manufacture facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 60, Subpart UU)	SIC Codes	NAICS Codes
Petroleum Refineries	2911	324110
Asphalt Paving Mixtures and Block Manufacturing	2951	324121
Asphalt Shingle and Coating Materials Manufacturing	2952	324122

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU).

A source must make the following reports:

Notifications/Reports	
Notification of construction/reconstruction	60.7(a)(1)

Notifications/Reports	
Notification of actual startup date	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of initial performance test	60.8(d)
Report of initial performance test	60.8(c)
Semiannual reports	60.7(c)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Operating temperature measurements of pollution control devices as appropriate, and the initial performance test results including temperature measurements	60.7(d)
Continuously monitor and record the temperature of the gas at the inlet of the control device	60.473(a)
Continuously monitor and record the temperature in the combustion zone of the afterburner	60.473(a)
For control devices not mentioned in paragraphs (a) and (b) of section 60.473, describing the operation of the control device and the process parameter(s)	60.473(c)
Records are required to be retained for two years	60.7(f)

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.

Respondent Activities
Install, calibrate, maintain, and operate temperature monitoring device.
Perform initial performance test, Reference Method 5A, 9, and 22 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 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 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 two 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 Table 1: Annual Respondent Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (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 34,100 (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 NSPS 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	\$144.33 (\$68.73+ 110%)
Technical	\$108.28 (\$51.56 + 110%)
Clerical	\$53.34 (\$25.40 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "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 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (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)
Temperature Monitors	\$100,000	2	\$200,000	\$35,000	144	\$5,040,000
TOTAL			\$200,000			\$5,040,000

Note: 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 \$200,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$5,040,000. This is the total of column G in the above table.

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 \$5,240,000. 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 such activities 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 \$129,000.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 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 – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (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 144 existing respondents will be subject to these standards. It is estimated that 2 existing respondents per year will undergo reconstruction and become subject to initial requirements. The overall average number of respondents, as shown in the table below, is 144 per year.

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

Number of Respondents		

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	2	144	0	2	144
2	2	144	0	2	144
3	2	144	0	2	144
Average	2	144	0	2	144

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 144.

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
Notification and application of construction/reconstruction	2	1	0	2
Notification of actual startup	2	1	0	2
Notification of physical or operational change which may increase the emission rate	2	1	0	2
Notification of demonstration of continuous monitoring system.	2	1	0	2
Notification of initial performance test	2	1	0	2
Report of initial performance test	2	1	0	2
Semiannual reports	144	2	0	288
TOTAL				300

The number of Total Annual Responses is 300.

The total annual labor costs are \$3,580,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for both 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 34,100. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU).

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 114 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$5,240,000. 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 2,750 labor hours at a cost of \$129,000, see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU).

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 the respondent labor hours as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred due to a change in assumption. In accordance with the Terms of Clearance, this ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 114 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, any 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-2013-0326. 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-2013-0326 and OMB Control Number 2060-0002 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 – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with the regulatory requirements ^c	1	1	1	144	144	7.2	14.4	\$17,399.59
B. Required activities								
Initial performance tests ^d	72	1	72	2	144	7.2	14.4	\$17,399.59
Repeat of performance test ^{d,e}	72	1	72	0.2	14.4	0.72	1.44	\$1,739.96
C. Create Information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/reconstruction ^f	2	1	2	2	4	0.2	0.4	\$483.32
Notification and demonstration of CMS ^g	40	1	40	2	80	4	8	\$9,666.44
Notification of actual startup	2	1	2	2	4	0.2	0.4	\$483.32
Notification of initial performance test	2	1	2	2	4	0.2	0.4	\$483.32
Report of performance test	See 3B							
Notification of physical or operational change ^h	2	1	2	2	4	0.2	0.4	\$483.32
Semiannual reports	24	2	48	144	6,912	345.6	691.2	\$835,180.42

Subtotal for Reporting Requirements						8,407		\$883,319
4. Recordkeeping requirements								
A. Familiarize with the regulatory requirements	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of daily production rate and hours of operation ⁱ	0.13	250	32.5	144	4,680	234	468	\$565,486.74
Records of operating parameters of CMS ^j	0.25	250	62.5	144	9,000	450	900	\$1,087,474.50
Records of startup, shutdown, and malfunctions ^k	60	1	60	144	8,640	432	864	\$1,043,975.52
F. Train personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						25,668		\$2,696,937
TOTAL ANNUAL BURDEN AND COST (rounded) ^l						34,100		\$3,580,000
CAPITAL AND O&M COST (rounded) ^l								\$5,240,000
GRAND TOTAL (rounded) ^l								\$8,820,000

Assumptions:

^a We have assumed that the average number of respondents that are subject to the regulation will be 144 with two source undergoing reconstruction per year over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$108.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "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.

^c We have assumed that all existing respondents will have to familiarize with the regulatory requirements each year.

^d We have assumed that it will take 72 hours of each respondent to perform the initial performance test.

^e We have assumed that 20 percent of respondents will fail the performance test and will have to repeat it.

- ^f We have assumed that each respondent will take two hours to write the notification of construction/reconstruction report.
- ^g We have assumed that each respondent will take 40 hours to write the notification and demonstration of CMS report.
- ^h We have assumed that each respondent will take 2 hours to write the notification of physical or operational change.
- ⁱ We have assumed that each respondent will enter information of daily production rate and hours of operation 250 times per year.
- ^j We have assumed that each respondent will take 15 minutes 250 times per year to record the operating parameters of CMS.
- ^k We have assumed that each respondent will take 60 hours to record startup, shutdown, and malfunction information.
- ^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Asphalt Processing and Roofing Manufacture (40 CFR Part 60, Subpart UU) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) ^b
Performance tests								
New or modified facility ^c	24	1	24	2	48	2.4	4.8	\$2,588.26
Repeat performance test								
New or modified facility ^d	24	0.2	4.8	2	9.6	0.48	0.96	\$517.65
Report review								
Notification of construction/reconstruction ^e	2	1	2	2	4	0.2	0.4	\$215.69
Notification of physical/operational changes ^f	2	1	2	2	4	0.2	0.4	\$215.69
Notification of actual startup	0.5	1	0.5	2	1	0.05	0.1	\$53.92
Notification of performance test	0.5	1	0.5	2	1	0.05	0.1	\$53.92
Review of performance test results ^g	8	1	8	2	16	0.8	1.6	\$862.75
Notification of demonstration of CMS	0.5	1	0.5	2	1	0.05	0.1	\$53.92
Semiannual reports	8	2	16	144	2,304	115.2	230.4	\$124,236.29
TOTAL ANNUAL BURDEN AND COST (rounded)						2,750		\$129,000

Assumptions:

^a We have assumed that the average number of respondents will be 144 with two source undergoing reconstruction per year over the three-year period of this ICR

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.80, Technical rate of \$48.08, and Clerical rate of \$26.02. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule” which excludes locality rates of pay.

^c We have assumed that it will take 24 hours of each respondent to perform initial performance test.

^d We have assumed that 20 percent of respondents will fail the performance test and will have to repeat it.

^e We have assumed that it will take each respondent two hours one-time per year to review notification of construction/reconstruction report.

^f We have assumed that it will take each respondent two hours one-time per year to review notification of physical/operation changes.

^g We have assumed that it will take each respondent eight hours one-time per year to review the performance test results report.

¹ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.