

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Wet-Formed Fiberglass Mat Production  
(40 CFR Part 63, Subpart HHHH) (Amendments)  
February 2018**

**Part A of the Supporting Statement**

**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) (Amendments),” EPA ICR Number 1964.08, 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 NESHAP is codified at 40 CFR Part 63, Subpart HHHH. Amendments to the NESHAP are being proposed as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below). The NESHAP apply to wet-formed fiberglass mat production facilities that emit greater than or equal to 10 tons per year (tpy) of any one hazardous air pollutant (HAP) or greater than or equal to 25 tpy of any combination of HAP. Affected sources include new and existing drying and curing ovens. The pollutants regulated include organic HAP, using formaldehyde as a surrogate. New facilities include those that commenced construction or reconstruction after the date of the original proposal (May 26, 2000). This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHH.

In general, all NESHAP require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, 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 sources subject to NESHAP. A semiannual report is also required.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are submitted to the delegated state or local authority. In the event that there is no such delegated authority, the reports are submitted directly to the United States Environmental Protection Agency (EPA) regional office.

The proposed amendments to the rule eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan and periodic report requirements; require electronic submittal of performance test results; require that compliance reports be submitted on a semiannual basis in all instances, consistent with the General Provisions; reduce the parameter monitoring and recording

requirements during use of binder containing no HAP; and make miscellaneous technical and editorial changes. The remaining portions of the NESHAP remain unchanged.

Based on consultation with industry representatives and state/local agencies, there are seven facilities subject to the standards. Five facilities have one affected drying and curing oven each and two facilities have two affected drying and curing ovens each. Each plant site has only one respondent (i.e., the owner/operator). Over the next 3 years, seven respondents per year will be subject to these standards, and no additional respondents per year will become subject to these standards. None of the seven facilities are owned by state, local, or tribal governments or the Federal government. They are owned and operated by privately owned for-profit businesses.

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**

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator’s judgment, HAP emissions, including formaldehyde and methanol, from drying and curing ovens at wet-formed fiberglass mat production sources cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR Part 63, Subpart HHHH in 2002.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emission limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, the EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting

requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA section 114(a) states that the Administrator may require any owner or 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.

## **2(b) Practical Utility/Users of the Data**

The control of emissions of HAP from drying and curing ovens at wet-formed fiberglass mat production facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these facilities are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using control technology. The notifications required in the 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 the standards are being met.

Performance test reports are needed, as these are the Agency's record of a source's initial and ongoing capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual compliance reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

## **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 submitted directly to the appropriate EPA regional office. Otherwise, the information is submitted 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 submitted to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

This section is not applicable because this is a rule-related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed Subpart HHHH RTR in the Federal Register.

### **3(c) Consultations**

Stakeholder outreach occurred with industry groups including Asphalt Roofing Manufacturers Association (ARMA) and member companies. This outreach is the basis for the number of affected facilities and industry growth over the next 3 years. Further stakeholder and public input is expected through public comment and follow-up meetings with interested stakeholders.

### **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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB under 5 CFR 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to the standards. The EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 years allows the EPA to establish the compliance history of a source, any pattern of noncompliance, and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond 5 years. In addition, the 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**

None of these reporting or recordkeeping requirements contain sensitive questions.

**4. The Respondents and the Information Requested**

**4(a) Respondents/NAICS Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of facilities that produce wet-formed fiberglass mat subject to 40 CFR Part 63, Subpart HHHH. The North American Industry Classification System (NAICS) codes for respondents affected by the standards is 327212.

**4(b) Information Requested**

**(i) Data Items**

All data in this ICR that are recorded and/or reported are required by 40 CFR Part 63, Subpart HHHH. Subpart HHHH references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

<b>Notifications/Reports</b>	
<b>Requirement</b>	<b>Regulation Reference (40 CFR Part 63)</b>
Construction/reconstruction	63.5(d)
Initial applicability of standard	63.9(b)(1), (2)
Actual startup	63.9(b)(4)(v)
Source is subject to special compliance requirements, if applicable	63.9(d)
Performance test	63.7(b), 63.9(e)
Performance test results	63.10(d)(2), 63.3000(d)
Electronic submittal of performance test data	63.3000(d)(1)
Continuous monitoring system (CMS) performance evaluation	63.9(g)
Performance evaluation results	63.10(e)(2), 63.3000(e)

<b>Notifications/Reports</b>	
Compliance status when a source becomes subject to the standard	63.9(h), 63.3000(b)
Semiannual compliance reports	63.3000(c), 63.10(e)(3)
Request for extension of compliance with relevant standard	63.9(c)
Change in information already provided	63.9(j)

A source must keep the following records:

<b>Recordkeeping</b>	
5-year retention of records	63.10(b)(1), 63.2999(a)
Records of maintenance on air pollution control and monitoring equipment	63.10(b)(2)(iii), 63.2998(d)
Records of performance tests, CMS performance evaluations, measurements, calibrations, and adjustments	63.10(b)(2)(vi-xi), (xiii), 63.10(c)(1), (5-8), (10-14) 63.10(d)(2), (e)(2), (3)
Operation, maintenance, and monitoring (OMM) plan	63.2998(b)
Records of monitored parameter values for operating limits	63.2998(c)
Documentation of initial notifications and notifications of compliance status	63.10(b)(2)(xiv)
Number of failures to meet applicable standards For each failure: date, time, and duration; cause; a list of affected sources or equipment, noncompliant emissions estimates, and method used to estimate emissions; and actions taken to minimize emissions and corrective actions taken to return affected unit to normal operation	63.2998(e)
Documentation for applicability determinations	63.10(b)(3)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	63.10(b)(2)(xii)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data (e.g., control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. As part of the RTR amendments, respondents would be required to use the EPA's

Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT.<sup>1</sup> The ERT can be accessed via the Compliance and Emissions Data Reporting Interface (CEDRI) and CEDRI can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>).

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read and understand the rule requirements.
Install, calibrate, maintain, and operate CMS.
Conduct performance tests using EPA Reference Methods 1, 2, 3 or 3A, 4, and 316, 318, or 320, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Develop a record system (e.g., develop, acquire, install, and utilize technology and systems for the purpose of collecting, validating, verifying, processing, maintaining, disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements).
Enter information required to be recorded above.
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:

<b>Agency Activities</b>
Review notifications, including notifications of construction/reconstruction, actual startup, applicability of standard, performance test, performance evaluation, and compliance status.
Review reports, including performance test reports and semiannual compliance reports, required to be submitted by industry.

<sup>1</sup> As of mid-2017, Methods 1-4, and 316 are the test methods referenced in subpart HHHH that are included in the ERT. Methods 318 and 320 (alternatives to Method 316 for formaldehyde measurement) are not yet supported by the ERT.

<b>Agency Activities</b>
Input, analyze, and maintain data in Enforcement and Compliance History Online (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 entered into the EPA's ECHO, which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

The records required by this regulation must be retained by the owner/operator for 5 years.

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

All current 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 because, at that time, two small entities were anticipated to be subject to the NESHAP. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements promulgated were the same for both small and large entities. The Agency considers these requirements to be the minimum needed to ensure compliance, and any future respondents that are small entities would be subject to the requirements.

### **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) (Amendments).

## **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 3 years from these recordkeeping and reporting requirements is estimated to be 1,470 hours per year (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:

<b>Civilian Labor Category</b>	<b>Occupational Code</b>	<b>BLS Mean Wage Estimate, in 2016\$<sup>a</sup></b>	<b>Loaded Wage (+110%), in 2016\$</b>
Managerial	11-1021	\$58.70	\$123.27
Technical	51-8090	\$30.65	\$64.37
Clerical	43-6010	\$19.39	\$40.72

<sup>a</sup> [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, survey titled *May 2016 National Occupational Employment and Wage Estimates United States.* The rates are from column 8, “Mean hourly wage.” 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 (O&M) 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. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. Existing sources are in compliance with initial rule requirements and no new sources are anticipated to be constructed over the 3-year period of this ICR. The annual O&M costs are the ongoing costs to maintain the CMS. No O&M costs are being attributed to industry as a result of this rule because the use of temperature monitors on thermal oxidizers are necessary to determine whether they are operating properly.

#### **(iii) Capital/Startup vs. 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 O&M costs.

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

The only costs to the Agency are costs associated with analysis of the reported information. Publication and distribution of the information are part of the ECHO program. Examination of records maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program. The average annual Agency cost during the 3 years of the ICR is estimated to be \$8,400.

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

<b>Agency Worker Rates</b>	<b>Labor Rates, \$/hr<sup>a</sup></b>	<b>60% Overhead</b>	<b>Total, \$/hr</b>
Managerial (GS-13, step 5)	\$40.50	\$24.30	\$64.80
Technical (GS-12, step 1)	\$30.05	\$18.03	\$48.08
Clerical (GS-6, step 3)	\$16.26	\$9.76	\$26.02

<sup>a</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf)

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 – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Amendments).

### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

Based on our research for this ICR, there are 7 existing respondents currently subject to the standard, all of which will keep records and submit reports. It is estimated that no additional respondents will become subject to the regulation in the next 3 years. The average number of respondents is calculated using the following table that addresses the 3 years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	7	0	0	7
2	0	7	0	0	7
3	0	7	0	0	7
Average	0	7	0	0	7

<sup>1</sup> New respondents include sources with constructed and reconstructed affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3-year period of this ICR is 7.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of 5-year performance test/retest	2.16	1	0	2.16
Report of performance test/retest	2.16	1	0	2.16
Semiannual compliance reports	7	2	0	14
			Total	18.32

The number of Total Annual Responses is 18.

The total annual labor costs are \$95,500. 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 1,470. 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) (Amendments).

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 82 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 the next 3 years is estimated to be 180 labor hours at a cost of \$8,400. 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**

This ICR is prepared for amendments to the NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR, Part 63, Subpart HHHH). These amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart HHHH) to remove the SSM exemption and SSM plan and periodic report requirements; (2) require electronic submittal of performance test results; (3) reduce the frequency of compliance reports from a quarterly basis to a semiannual basis when there are deviations from applicable standards; (4) reduce the parameter monitoring and recording requirements during use of binder containing no HAP; and (5) make technical and editorial changes. Where applicable, adjustments for these amendments are reflected in Tables 1 and 2 of this ICR.

The number of facilities subject to the standards changed based on consultation with industry representatives and state/local agencies. Consolidation within the industry and instances where facilities reduced their HAP emissions to below major source thresholds prior to the compliance date reduced the number of affected facilities to seven that are currently subject to the standards. Five facilities have one

affected drying and curing oven each and two facilities have two affected drying and curing ovens each.

Costs per labor hour increased due to increases in labor rates. In addition, the burden estimate for reading and understanding the rule requirements was adjusted to reflect the time it would take industry to review the amended rule, including becoming familiar with the new requirement to electronically submit performance test results. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports. We estimate that the burden associated with the separate recordkeeping requirements for periods of SSM that are being removed to be approximately the same as the burden associated with the recordkeeping requirements for deviations from rule requirements and, therefore, did not adjust burden for recordkeeping and semiannual compliance reporting. The burden estimate for performance test report submittal was not adjusted to account for the new requirement that results of performance tests would be reported electronically through CEDRI using the ERT. The burden estimate of four hours in the current ICR for paper format submittal of performance test results is an appropriate estimate for electronic submittal of performance test results. The burden estimate for reducing the frequency of compliance reports from a quarterly basis to a semiannual basis for facilities with instances of failing to meet applicable standards was not adjusted because the burden estimate in the current ICR is already based on semiannual reporting and does not, therefore, need adjusting. There also was no adjustment in burden for reducing the parameter monitoring and recording requirements during use of binder containing no HAP because it is not known if, or how often, binder containing no HAP will be used.

### **Impacts to Affected Entities**

To estimate the costs associated with these changes to recordkeeping and reporting requirements, information previously developed as part of the Information Collection Request (ICR) process was consulted.<sup>2</sup>

The proposed removal of the SSM exemption would result in the emissions standards in the rule applying at all times. Based on discussions with affected entities, we believe facilities are already operating control technologies during all periods of that wet-formed fiberglass mat is being produced and therefore would incur no costs associated with additional operation of controls. We also proposed to eliminate the requirement for the development of a SSM plan as required under 40 CFR 63.2986(g)(3). The 2002 NESHAP required this plan to be developed by the compliance date of April 11, 2005, for existing sources and April 11, 2002 or startup, for new or reconstructed sources, with no requirement for updates to the plan. Because there is no requirement for updates, no cost savings are estimated for the proposed removal of this provision. All affected facilities are anticipated to experience a small cost savings associated with the proposed removal of recordkeeping and reporting requirements specific to SSM events. Currently, facilities are required to maintain SSM records, as outlined under 40 CFR 63.2998(e)(5) and (f), and report on SSM events under 63.3000(c)(5) (iv) and (vii), and 63.3000(e).

Eight hours have been estimated for affected facilities to read and understand the requirements of the amended rule.

The tables below summarize the ICR renewal burden estimates associated with (1) SSM

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<sup>2</sup> “Supporting Statement Environmental Protection Agency NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal),” May 28, 2015. Docket ID: EPA-HQ-OECA-2014-0079-0003.

recordkeeping and reporting requirements that this action proposes to eliminate; and (2) review of the amended rule by affected facilities. These figures have been adjusted to reflect seven responding facilities, and updated labor rates have also been used.

Labor rates were updated using the United States Department of Labor, Bureau of Labor Statistics, survey titled *May 2016 National Occupational Employment and Wage Estimates United States*.<sup>3</sup> The rates are from column 8, “Mean hourly wage.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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<sup>3</sup> See [https://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm#00-0000).



**Wage Rate by Labor Category (2016\$)**

	<b>Occupational Code</b>	<b>BLS Mean Wage Estimate, in 2016\$</b>	<b>Loaded Wage (+110%), in 2016\$</b>
<b>Technical</b>	51-8090	\$30.65	\$64.37
<b>Managerial</b>	11-1021	\$58.70	\$123.27
<b>Clerical</b>	43-6010	\$19.39	\$40.72

As shown in the table below, these proposed changes to recordkeeping and reporting requirements are estimated to result in a total industry-wide annual cost of \$200.

**Annual Respondent Burden and Cost (2016\$)**

<b>Burden Item</b>	<b>(A) Person-Hours per Occurrence</b>	<b>(B) No. of Occurrences per respondent per year</b>	<b>(C) Hours per respondent per year</b>	<b>(D) Respondents per year</b>	<b>(E) Technical Hours per year (=C*D)</b>	<b>(F) Management Hours per year (=E*0.05)</b>	<b>(G) Clerical Hours per year (=E*0.1)</b>	<b>(H) Cost</b>
Startup, shutdown, malfunction report <sup>(a)</sup>	(8)	(2)	(16)	(1)	(16)	(0.8)	(1.6)	(\$1,194)
Review amended rule requirements <sup>(b)</sup>	8	1	8	2.33	18.64	0.93	1.86	\$1,390
Total Burden and Cost rounded						3.03 3		\$196 \$200

(a) The currently approved ICR assumed that 15 percent of respondents will have a startup, shutdown, or malfunction occur that is not managed according to the regulation. Given that there are now an estimated 7 affected facilities, this results in an estimate of 1 respondent per year.



- (b) There are an estimated 7 respondents. Estimate assumes that, on average each year, the number of respondents reviewing the amended rule is 2.33 respondents per year ( $7 / 3$ ) years = 2.33.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 83 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2004-0309. 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 EPA Docket Center, 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) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2004-0309 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) (Amendments)**

Burden item	(A) Person-hours per occurrence	(B) No. Of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and studies	N/A							
3. Reporting requirements								
A. Read and understand rule requirements <sup>c</sup>	8	1	8	2.33	18.64	0.93	1.86	\$1,390.24
B. Required activities								
Initial performance tests <sup>d</sup>	200	1	200	0	0	0	0	\$0
5-year performance test <sup>d</sup>	221	1	221	1.8	397.8	19.89	39.78	\$29,678.07
Repeat of performance test <sup>d</sup>	221	1	221	0.36	79.56	3.98	7.96	\$5,936.02
Monitoring of operations and equipment <sup>e</sup>	See 4E							
Operation, maintenance, monitoring plan	40	1	40	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report <sup>a, d</sup>								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of applicability of standard	2	1	2	0	0	0	0	\$0
Notification of performance test/retest	2	1	2	2.16	4.32	0.22	0.43	\$322.71
Notification of compliance status	2	1	2	0	0	0	0	\$0
Report of performance test/retest (through CEDRI using ERT) <sup>f</sup>	4	1	4	2.16	8.64	0.43	0.86	\$644.19

Burden item	(A) Person-hours per occurrence	(B) No. Of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Semiannual compliance report with instances of failure to meet applicable standards <sup>g</sup>	16	2	32	1.4	44.8	2.24	4.48	\$3,342.33
Semiannual compliance report with no instances of failure to meet applicable standards <sup>g</sup>	8	2	16	5.6	89.6	4.48	8.96	\$6,684.65
<b>Subtotal for Reporting Requirements</b>					<b>739.86</b>			<b>\$47,998.21</b>
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit all information required by the rule <sup>h</sup>	1.75	52	91	7	637	31.85	63.7	\$47,523.70
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>					<b>732.55</b>			<b>\$47,523.70</b>
<b>TOTAL LABOR BURDEN AND COSTS (Rounded) <sup>ij</sup></b>						<b>1472.41</b>		<b>\$95,521.91</b>
						<b>1470</b>		<b>\$95,500</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):</b>								<b>\$0.00</b>
<b>TOTAL COST:</b>								<b>\$95,500</b>

**Assumptions:**

<sup>a</sup> There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line and 2 with two lines, which are subject to this standard. We have assumed that there will be no new lines constructed over the 3-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$64.37 per hour for Technical labor, \$123.27 per hour for Executive, Administrative, and Managerial labor, and \$40.72 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics survey titled *May 2016 National Occupational Employment and Wage Estimates United States.* The rates are from column 8, “Mean hourly wage.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We estimate that it will take the respondent 8 hours to read and understand amended rule requirements, including the new requirement to electronically submit performance test results; this is a one-time requirement (7 respondents/3 years = 2.33).

<sup>d</sup> 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 5 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, 318, or 320 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. These estimates include CMS performance evaluation requirements. There are an estimated 7 respondents (with 9 affected drying/curing ovens). On average each year, the number of respondents conducting the performance test is 1.8 ( $9 / 5 = 1.8$ ) and conducting a repeat performance test is 0.36 ( $1.8 \times 0.20$ ).

<sup>e</sup> 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).

<sup>f</sup> There are an estimated 7 respondents (with 9 affected drying/curing ovens). On average each year, the number of respondents conducting a performance test or repeat performance test and electronically submitting their test results is 2.16 ( $1.8 \text{ tests} + 0.36 \text{ retests}$ ).

<sup>g</sup> We have assumed that approximately 80 percent of the 7 respondents (or 5.6) will report no instances of failure to meet applicable standards twice a year and approximately 20 percent (or 1.4) will report instances of failure to meet applicable standards twice a year.

<sup>h</sup> 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.

<sup>i</sup> Totals have been rounded to 2 significant figures. Figures may not add exactly due to rounding.

<sup>j</sup> 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) (Amendments)**

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 <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.10)	(H) Cost, \$ <sup>b</sup>
Review initial notifications: construction/reconstruction, startup, applicability, compliance status <sup>a</sup>	2	1	2	0	0	0	0	\$0
Review notification of 5-year performance test/retest <sup>c</sup>	2	1	2	2.16	4.32	0.22	0.43	\$233.16
Review performance test/retest reports <sup>c</sup>	8	1	8	2.16	17.28	0.86	1.73	\$931.56
Semiannual compliance report with instances of failure to meet applicable standards <sup>d</sup>	16	2	32	1.4	44.8	2.24	4.48	\$2,415.70
Semiannual compliance report with no instances of failure to meet applicable standards <sup>d</sup>	8	2	16	5.6	89.6	4.48	8.96	\$4,831.41
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>e, f</sup></b>						179.4 <b>180</b>		\$8,411.83 <b>\$8,400</b>

**Assumptions:**

<sup>a</sup> There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line and 2 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 3-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), and Clerical rate of \$26.02 (GS-6, Step 3, \$16.26 + 60%). These rates are from the OPM “2017 General Schedule” which excludes locality rates of pay.

<sup>c</sup> The rule requires a performance test every 5 years since the initial test was conducted. We have assumed that 20 percent of the performance tests fail and will have to be repeated. There are an estimated 7 respondents (with 9 affected drying/curing ovens). On average each year, the number of respondents conducting the performance test is 1.8 (9 / 5 = 1.8) and conducting a repeat performance test is 0.36 (1.8 x 0.20).

<sup>d</sup> We have assumed that approximately 80 percent of the 7 respondents (or 5.6) will report no instances of failure to meet applicable standards twice a year and approximately 20 percent (or 1.4) will report instances of failure to meet applicable standards twice a year.

<sup>e</sup> Totals have been rounded to 2 significant figures. Figures may not add exactly due to rounding.

<sup>f</sup> The numbers used in the text for the final totals should be rounded values.