

Type of Facility

Existing Facilities

Purchase Alternative

Monthly average alternative, no control device

Monthly average alternative, control device

New Facilities

Industry Consult from Korbin Smith, OAQPS, October 2017:

We surveyed RMA members to see which compliance option in the MACT they are using

Option (a) Purchase Alternative – 8 RMA member facilities use this option

Option (b) Monthly average alternative, without using add-on control devices – 12 RMA member facilities

Option (c) Monthly average alternative, using an add-on control device – No RMA member facilities

Tire Manufacturing (no cTire Manufacturing with Requirements:

Tread

19	2	2
8 N/A for cord	Monthly purchase records	
13	2	
0	0 NA - no sources.	
0		

ng and here is what we found:

% of overall respondents so that we can apply to all facilities including the ones not in the trade group:

- 40%
- 60%
- 0%

Total Annual Responses

(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses
Initial Notifications	0	1
Performance test notification	0	1
Compliance status notification	0	1
Notification of alternative monitoring method	0	1
Notification of reassessment of predominant use	0	1
Start-up Shutdown and malfunction plan	0	1
Site-specific monitoring plan	0	1
Performance test reports	0	1
Semiannual compliance reports	15	2
Annual compliance reports	8	1
Startup/shutdown/malfunction reports	0	2

(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(BxC)+D$
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	30
0	8
0	0
Total	38

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=A x B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements ^a	4	1	4
B. Required Activities			
i. Performance test	30	0.25	7.5
C. Create Information	See item 4.F		
D. Gather existing information	N/A		
E. Write reports			
i. Initial Notifications ^c	2	1	2
ii. Performance test notification ^d	2	1	2
iii. Compliance status notification ^c	2	1	2
iv. Notification of alternative monitoring method ^d	2	1	2
v. Notification of reassessment of predominant use ^e	2	1	2
vi. Start-up Shutdown and malfunction plan ^d	20	1	20
vii. Site-specific monitoring plan ^d	20	1	20
viii. Performance test reports ^d	10	1	10
ix. Semiannual compliance reports ^f	8	2	16
x. Annual compliance reports ^g	8	1	8
xi. Startup/shutdown/malfunction reports ^d	4	2	8
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3.A		
B. Plan activities ^c	N/A - one-time	upon becoming	subject
C. Implement Activities	N/A - covered by	reporting and	recordkeeping
E. Develop record system ^c	N/A - one-time	upon becoming	subject
F. Time to enter information			
i. Records of notifications ^c	2	1	2
ii. Records of performance tests ^d	0.5	0.25	0.125
iii. Records related to startup, shutdown, and malfunction ^d	2	12	24
iv. Monthly Purchase records - purchase alternative ^g	2	12	24
v. Compliance calculation and supporting data - monthly average option ^h	0.5	365	182.5
vi. Method 311 or alternative results ⁱ	0.5	12	6

vii. Control equipment O&M log ^d	4	1	4
viii. CPMS calibration validation records ^d	1	1	1
ix. Operating parameters ^d	1	1	1
G. Time to train personnel	N/A - one-time	upon becoming	subject
H. Store, file and maintain records ^j	4	12	48
I. Retrieve records/reports ^j	4	12	48
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)^k			
Total CAPITAL and O&M COST (rounded)^k			
GRAND TOTAL (rounded)^k			

Assumptions:

^a Based on recent updates to the facility inventory, we estimate there are approximately 23 respondents, including: facilities. No additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$11: These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2: Civilian 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages availabl

^c One time only activity. The existing sources have already completed this requirement and there are no new source

^d This activity is only required for units complying with control devices. Based on consultations with the industry, non they occur their frequency is once every five years.

^e The EPA does not estimate anyone will submit these reassessment notifications.

^f The facilities using the monthly average compliance option will have to submit semi-annual compliance reports. Ba production facilities and tread/re-tread facilities use this option. In addition, all of the tire cord facilities use this optio

^g Facilities that are using the purchase option to comply will have to demonstrate monthly that only compliant coatins semi-annually.

^h Facilities that are using the monthly compliance option will have to collect material usage data for the monthly aver conservative estimate.

ⁱ Both facilities using the purchasing alternative or the monthly averaging alternative must keep records of the Metho

^j All facilities will store and retrieve records/reports

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

149.35 112.98 54.81

(D) Respondents per year ^a	(E) Technical person- hours per year (E=C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year ^b
23	92	4.6	9.2	\$14,764.16
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
15	240	12	24	\$38,515.20
8	64	3.2	6.4	\$10,270.72
0	0	0	0	\$0
		455		\$63,550
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
8	192	9.6	19.2	\$30,812.16
15	2,738	136.88	273.75	\$439,314
23	138	6.9	13.8	\$22,146.24

0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
23	1,104	55.2	110.4	\$177,169.92
23	1,104	55.2	110.4	\$177,169.92
	6,067			\$846,612
	6,520			\$910,000
				\$0
	6,520			\$910,000

19 tire production, 2 tire and cord production, and 2 tread or retread-only

2.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. Workers, by Occupational and Industry Group.” The rates are from column e to those employed by private industry.

s, so no burden is estimated during this ICR renewal period.

ie of the facilities are using control devices. For performance tests, should

sed on consultations with industry, we estimate 60 percent of the tire on.

igs were used and are allowed to submit the reports annually instead of

rage compliance calculation. We assumed daily data collection as a

od 311 (or alternative test method) results.

Basis

Previous (expired) ICR

ERG estimate based on hours estimate for performance test in 1957.08 ICR. The facility time is to prepare and observe test, test itself is typically contracted out.

Previous (expired) ICR

Previous (expired) ICR. Applies once every 5 years for facilities using control devices

Previous (expired) ICR

ERG engineering judgment of 2 hours; simliar LOE as other notification line items (control device only)

ERG engineering judgment of 2 hours; simliar LOE as other notification line items. Assume 0 source (cord production only)

ERG engineering judgement, time to write plan will require more hours than a notification.

ERG engineering judgement, time to write plan will be similar to writing an SSM plan.

ERG engineering judgement; this is time to review reports once testing contractor submits them to the facility.

Previous (expired) ICR

Previous (expired) ICR

ERG engineering judgement, more time then a notification, but less than a plan. Assumes most data collection for report is automated obtained.

ERG engineering judgement

ERG engineering judgement

ERG engineering judgement

Previous (expired) ICR

Previous (expired) ICR

ERG engineering judgement, filing of report results, results likely to be sent electronically.

ERG engineering judgement, minimal time to file the record but slightly more hours than the automated data collection, since it may involve hand-entry of data logs from O&M staff

ERG engineering judgement, minimal time to file the record.

ERG engineering judgement, filing of automatically collected operating parameters

Previous (expired) ICR

Previous (expired) ICR

responses 38

hr per resp 172

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (A x B)	(D) Plants per year ^a	(E) Technical person- hours per year (C x D)
Review Initial notification reports ^c	2	0	0	0	0
Review Performance Test Notifications ^d	2	0.25	0.5	0	0
Review notifications of compliance status ^c	2	1	2	0	0
Review notifications of alternative monitoring ^d	2	2	4	0	0
Review notifications of reassessment of predominant use ^d	2	3	6	0	0
Review performance test results ^d	10	0.25	2.5	0	0
Review semiannual summary reports ^a	4	2	8	15	120
Review annual summary reports ^a	4	1	4	8	32
Review start-up, shutdown malfunction reports ^d	4	1	4	0	0
TOTAL ANNUAL BURDEN AND COST (rounded)^e					

Assumptions:

^a Based on recent updates to the facility inventory, we estimate there are approximately 23 respondents, including: 19 tire pr tread or retread-only facilities. No additional new or reconstructed sources becoming subject to the rule over the next three years. Facilities that are using the monthly compliance option will have to demonstrate monthly that only compliant coatings were used and are allowed to submit the report. Facilities that are using the monthly compliance option will have to collect material usage data for the monthly average compliance collection as a conservative estimate.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government cost: \$48.08 for Technical, and \$26.02 Clerical. These rates are from the Office of Personnel Management (OPM) "2017 General pay."

^c These are initial requirements that apply to new sources only

^d Since no facilities are using control devices to comply with the rule, the performance test, alternative monitoring and start-up being submitted by industry and therefore do not need to be reviewed. In addition, we have assumed that no facilities are subject to predominant use.

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

64.8		26.02
(F) Management person-hours per year (E x 0.05)	(G) Clerical person-hours per year (E x 0.1)	(H) Cost, \$ ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
6	12	\$6,470.64
1.6	3.2	\$1,725.50
0	0	\$0
175		\$8,200

roduction, 2 tire and cord production, and 2
ears. Facilities that are using the purchase
orts annually instead of semi-annually.
pliance calculation. We assumed daily data

overhead expenses: \$64.80 for Managerial,
Schedule” which excludes locality rates of

p, shutdown and malfunction reports are not
mitting notifications of reassessment of