

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), EPA ICR Number 1976.07, OMB Control Number 2060-0509.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites (RPC) Production (40 CFR Part 63, Subpart WWWW) were proposed on August 2, 2001, and promulgated on April 21, 2003. These regulations apply to both existing facilities and new facilities with reinforced plastic composites (RPC) production operations and processes. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 40 CFR Part 63, Subpart WWWW.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The "Affected Public" includes owners and operators of RPC production operations and processes. The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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 – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal). There are approximately 448 reinforced plastics facilities, which are owned and operated by the reinforced plastics industry. The number of affected facilities and growth rate for the industry has decreased based on consolidation within the industry, as identified by the Agency's internal industry experts. None of the 448 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.

Over the next three years, approximately 448 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutant (HAP) emissions from RPC production facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart WWWW.

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 the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the

operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform either the Agency or its 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 that these 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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart WWWW.

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* 83 FR 24785 on May 30, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

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 these standards, 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 number of affected facilities and growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 448 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to

comment on the burden associated with these standards as they were being developed and that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Composites Manufacturer's Association (ACMA), at (703) 682-1656, and the University of Delaware's Center for Composite Materials, at (302) 831-8149.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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

3(f) Confidentiality

Any information submitted to the Agency, for which a claim of confidentiality is made, will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of RPC manufacturing facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and their corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR Part 63, Subpart WWW)	SIC Codes	NAICS Codes
Custom Compounding of Purchased Plastics Resins	3087	325991
Unlaminated Plastics Film and Sheet Manufacturing	3081	326113
Unlaminated Plastics Profile Shape Manufacturing	3082, 3089	326121
Plastics Pipe and Pipe Fitting Manufacturing	3084, 3089	326122
Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing	3083	326130
Polystyrene Foam Product Manufacturing	3086	326140
Plastics Plumbing Fixture Manufacturing	3088	326191
All Other Plastics Product Manufacturing	3999, 3089	326199
Pottery, Ceramics, and Plumbing Fixture Manufacturing	3261, 3262, 3263, 3264, 3269, 3299	327110
Cut Stone and Stone Product Manufacturing	3281	327991
Metal Window and Door Manufacturing	3442, 3444	332321
Metal Tank (Heavy Gauge) Manufacturing	3443	332420
Oil and Gas Field Machinery and Equipment Manufacturing	3533	333132
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing	3585	333415

Turbine and Turbine Generator Set Units Manufacturing	3511	333611
Industrial Truck, Tractor, Trailer, and Stacker Machinery Manufacturing	3537, 3799	333924
Audio and Video Equipment Manufacturing	3651, 3679	334310
Power, Distribution, and Specialty Transformer Manufacturing	3612	335311
Switchgear and Switchboard Apparatus Manufacturing	3613	335313
Noncurrent-Carrying Wiring Device Manufacturing	3644	335932
Automobile Manufacturing	3711	336111
Motor Vehicle Body Manufacturing	3711, 3713, 3714	336211
Motor Home Manufacturing	3716	336213
Travel Trailer and Camper Manufacturing	3792, 3799	336214
Motor Vehicle Electrical and Electronic Equipment Manufacturing	3647, 3694, 3714	336320
Other Aircraft Parts and Auxiliary Equipment Manufacturing	3728	336413
Railroad Rolling Stock Manufacturing	3743	336510
Wood Kitchen Cabinet and Countertop Manufacturing	2434, 2451	337110
Household Furniture (except Wood and Metal) Manufacturing	2499, 2519	337125
Institutional Furniture Manufacturing	2531, 2541, 2542, 2599, 3821, 3999	337127
Showcase, Partition, Shelving, and Locker Manufacturing	2426, 2511, 2514, 2542, 3429, 3499	337215
Sporting and Athletic Goods Manufacturing	3069, 3949	339920
Gasket, Packing, and Sealing Device Manufacturing	3053	339991

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW).

A source must make the following reports:

Notifications	
General references for notification requirements	§63.5905(a), Table 13, Table 15
Initial notification requirements	§63.9(b)(1), §63.9(b)(2), 63.9(b)(4), 63.9(b)(5)
Notification of compliance status when a source becomes subject to the standard	§63.9(h),
Notification that source is subject to special compliance requirements, if applicable	§63.9(d)
Notification of performance test 1	§63.7(b)(1), §63.9(e),
Rescheduled of performance test	§63.7(b)(2)
Notification of performance evaluation, if using CMS	§63.8(e)(2)
Demonstration of continuous monitoring system, if using CMS	§63.9(g)
Change in information already provided	§63.5905(b), §63.9(j)
Request for an extension of compliance with relevant standard	§63.9(c)
Notification and one-time exemption request status if 100 tpy threshold exceeded	§§63.5805(e)-(f), §63.5910(f)

Reports	
General references for reporting requirements	§63.5910(a), Table 14, Table 15
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§§63.5(d)(2)-(4), §63.5(e)
Annual organic HAP emissions	§§63.5799(b)(2) and (c)
Performance test results	§63.10(d)(2), §63.5850(e)(4)(ii)
Report of performance evaluation, if using CMS	§63.8(e)(5)(i)
Additional reporting requirements for CMS	§§63.10(e)(1)-(3)
Startup, shutdown and malfunction plan	§63.6(e)(3)
Periodic startup, shutdown and malfunction reports	§63.10(d)(5)(i), §63.5910(c)(4)
Immediate startup, shutdown and malfunction reports	§63.10(d)(5)(ii), §63.5910(a) and Table 14

Reports	
Progress reports for compliance extension (if applicable)	§63.10(d)(4)1
Semiannual compliance reports	§63.5910(c)

A source must keep the following records:

Recordkeeping	
General references for recordkeeping requirements	§§63.5865, 63.5895, 63.5915, Tables 10, 11, 12 and 15, §63.10(b)(1)
Startup, shutdown and malfunction plan	§63.6(e)(3), §63.5915(a)(2)
All reports and notifications and Documentation of initial notifications	§63.10(b)(1), §63.10(b)(2)(xiv), §63.5915(a)(1)
Records of startup, shutdown, and malfunction of process equipment	§§63.10(b)(2)(i), (iv), (v)
Records of malfunctions of air pollution control equipment	§63.10(b)(2)(ii)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	§63.1(b)(3), §63.10(b)(3)
Records of maintenance of air pollution control equipment	§63.10(b)(2)(iii)
CMS records, records of flow monitoring, data on performance tests, CMS performance evaluations, measurements to determine performance test conditions, calibrations, and adjustments	§§63.10(b)(2)(vi, vii, viii, ix, x, and xi), §63.10(c), §63.5915(a)(3)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	§63.10(b)(2)(xii)
Five-year retention of records	§63.10(b)(1), §163.5764(b)
If using add-on control device retain the monitoring records required in Part 63 Subpart SS	§63.5895(a), §63.5915(b), §63.998
Collect and keep records of resin and gel coat use, organic HAP content, and operation	§§63.5895(c), (d), §63.5865, Tables 10, 11, and 12
Record all times that wet area enclosures doors or covers are open, and that there is resin in the bath, for each pultrusion machine	§63.5895(e)
All data, assumptions and calculations used to determine organic HAP emission factors or content	§63.5915(c)
Certified statement of compliance with work practices	§63.5915(d)

Recordkeeping	
Records showing compliance with percent reduction or lbs/ton requirements for continuous lamination/casting operations	§§63.5915(e)(1)-(4)
Annual controlled and/or uncontrolled HAP emissions (as applicable)	§63.5865, Tables 10, 11 and 12
Destruction efficiency of add-on control device (if applicable)	§63.5865(a) and Tables 10 and 12
Capture efficiency of area enclosure (if applicable)	§63.5865, Tables 10, 11 and 12
Annual organic HAP emissions that escape the enclosure	§63.5865, Table 11
Inlet and outlet organic HAP emissions (if applicable)	§63.5865, Tables 10 and 12
Enclosure meets Method 204 for a PTE (if applicable)	§63.5865, Tables 10, 11 and 12

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.
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 standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. 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 five years.

5(c) Small Entity Flexibility

We estimate that 82 percent of respondents are small businesses. The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of

control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastics Composites Production (40 CFR Part 63, Subpart WWWW) (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 neither conduct nor 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 14,800 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$147.40 (\$70.19 + 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “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 open molding operations. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs include 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 ¹	(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 Response	(F) Number of Responses / Source	(G) Total O&M, (E X F)
N/A ²	0	0	0	\$20.13	910	\$18,318
SMC enclosure ³				\$450,000	1	\$450,000
Total (Rounded) ⁴						\$468,000

¹ This ICR assumes all existing sources are in compliance with initial rule requirements and that the monitoring devices are integral parts of the control devices necessary to determine whether these sources are operating properly

² We have estimated that file storage and photocopying costs per response cost one hour of clerical labor at \$12.50. First class postage is estimated at \$7.63 per response for mailing to regulatory agencies. The total cost for this item is based on the number of responses calculated in Section 6(d).

³ Assumes that the cost of MACT-mandated use of nylon-containing film for sheet molding compound (SMC) enclosure for a large SMC facility is approximately \$450,000/yr. This is comprised of a purchase cost of \$400,000/yr and a disposal cost of \$50,000/yr compared to non-nylon film (nylon-containing film is not very recyclable). Based on prior consultations, this cost estimate would apply to no more than 5 percent of the industry. EPA has included the cost for one facility, but note it may apply to additional facilities with open molding operations.

⁴ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

The total operation and maintenance (O&M) costs for this ICR are \$468,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$468,000. 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 \$115,000.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastics Composites Production (40 CFR Part 63, Subpart WWWW) (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 448 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 448 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	448	0	0	448

Number of Respondents					
2	0	448	0	0	448
3	0	448	0	0	448
Average	0	448	0	0	448

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 448.

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 of compliance status	0	1	0	0
Notification/application of construction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test and test plan	0	1	0	0
Report of performance test results	0	1	0	0
Report of exceedances ¹	89.6	2	0	179.2
Report of no exceedances ¹	358.4	2	0	716.8
Report of startup, shutdown, malfunction	14	1	0	14
Total			Total (Rounded)	910

¹ Assumes approximately 80 percent of the 448 (or 358.4) existing respondents will report no excess emissions twice a year and approximately 20 percent (or 89.6) will report excess emissions twice a year.

The number of Total Annual Responses is 910.

The total annual labor costs are \$1,690,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 14,800 hours. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$468,000. 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 2,450 labor hours at a cost of \$115,000; see Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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

The decrease in burden from the most recently-approved ICR is not due to any program changes. The change in the burden and cost estimates occurred because the total number of respondents has decreased due to consolidation within the industry, and no new respondents are anticipated over the next three years of this ICR. The decrease in the number of existing and new respondents also results in a reduced number of total annual responses; this ICR reduces the number of responses associated with submittal of exceedance reports from existing respondents and excludes responses associated with the submittal of initial notifications or performance test plans or results that were previously only required from new respondents. Additionally, there is a decrease in the Agency burden as this ICR removes the burden associated with review of submitted initial notifications and materials related to performance tests, which are only

applicable to new respondents. There is also an adjustment decrease in the capital/startup and O&M costs due to the reduced number of respondents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0081. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2014-0081 and OMB Control Number 2060-0509 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 Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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 (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements ^c								
i. Facilities with 4 groups of operations	1.00	1	1	416.64	416.64	20.83	41.66	\$54,576.50
ii. Facilities with 5 groups of operations	1.25	1	1	31.36	39.20	1.96	3.92	\$5,134.90
B. Required activities: Sources with add-on controls								
i. Initial performance test ^d	320	1	320	0	0	0	0	\$0
ii. Repeat of performance test	320	1	320	0	0	0	0	\$0
iii. Operation, maintenance, monitoring plan	40	1	40	0	0	0	0	\$0
iv. Startup, shutdown, malfunction plan	20	1	20	0	0	0	0	\$0
v. Monitoring of operating parameters and equipment ^e	See 5E							
C. Gather Existing Information	See 5D, 5E							
D. Write report ^a								
i. Notification of compliance status ^d	4	1	4	0	0	0	0	\$0
ii. Notification of construction/reconstruction ^{a, d}	2	1	2	0	0	0	0	\$0

iii. Notification of actual startup ^d	2	1	2	0	0	0	0	\$0
iv. Notification of performance test ^d	2	1	2	0	0	0	0	\$0
v. Reports of performance test results	See 4B							
vii. Report of exceedances ^g	16	2	32	89.60	2867.20	143.36	286.72	\$375,580.30
viii. Report of no exceedances ^g	8	2	16	358.40	5734.40	286.72	573.44	\$751,160.52
ix. Startup, shutdown, malfunction report ^h	2	1	2	14.00	28.00	1.40	2.80	\$3,668
Subtotal for Reporting Requirements					10,448			\$1,190,120
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system (spreadsheets): ⁱ								
i. System for low HAP resin	4	1	4	0	0	0	0	\$0
ii. System for work practices	1	1	1	0	0	0	0	\$0
iii. System for add-on control devices	2	1	2	0	0	0	0	\$0
E. Time to enter and transmit all information into record system ⁱ								
i. Enter information on low HAP resin	10	1	10	358	3580	179	358	\$468,951.36
ii. Enter information on work practices and operating parameters	N/A							
F. Develop operator training course and keep records of operators taken it ^d	10	1	10	0	0	0	0	\$0
G. Time to train personnel: ^j								
i. Small facilities (less than 100 employees)	2	1	2	0	0	0	0	\$0
	0.4	1	0.4	367.36	146.94	7.35	14.69	\$19,248.49
ii. Medium facilities (100-250	4	1	4	0	0	0	0	\$0

employees)	0.8	1	0.8	49.28	39.42	1.97	3.94	\$5,164.23
iii. Large facilities (more than 250 employees)	8	1	8	0	0	0	0	\$0
	1.6	1	1.6	31.36	50.18	2.51	5.02	\$6,572.65
H. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					4,389			\$499,937
TOTAL LABOR BURDEN AND COST (rounded)^k:					14,800			\$1,690,000
Capital and O&M Cost (rounded)^k:							\$468,000	
TOTAL COST (rounded)^k:							\$2,160,000	

Assumptions:

^a There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be no new RPC facilities each year over the three year period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small business, 11 percent are medium size facilities and 7 percent are large facilities. Furthermore, we have assumed that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of five groups of operations.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1: "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed 93% of respondents have 4 groups of operations and 7% of respondents have 5 groups of operations.

^d We have assumed no new respondents over the next three years due to trends in industry consolidation. Because there are no new respondents, we expect no burden for this requirement.

^e Monitoring and recordkeeping of operations for respondents with enclosures and add-on control devices include: 1) specific operating parameters for each control device established during the performance test, 2) start-up, shutdown, and malfunctions of equipment, and 3) work practices.

^f Monitoring and recordkeeping of operations for respondents that comply by limiting the HAP content of their raw materials include: 1) monitoring and recording in a spreadsheet the monthly consumption of material and the weighted-average HAP content over the past 12 months, and 2) work practices. However, if all the materials in an operation meet the HAP content limit, then each respondent would need only to record HAP content and would not need to track monthly consumption or record the computations. For open molding and centrifugal casting operations, respondents would also have the option of averaging among thirteen different processes (open molding) and two different processes (centrifugal casting to calculate the monthly average of the actual and allowable emissions for the combined open molding and centrifugal casting operations).

^g We have assumed that approximately 80 percent of the 448 (or 358.4) existing respondents will report no excess emissions twice a year and approximately 20 percent (or 89.6) will report excess emissions twice a year.

^h We have assumed that all RPC facilities with add-on controls (approximately 3% or 14 facilities) will have at least one startup, shutdown or malfunction (SSM) that is not managed according to the SSM plan.

ⁱ New respondents (0) would be required to develop a record system and existing respondents would be required to record operational data. For existing

respondents, the following monitoring is required: 1) facilities with open molding and/or centrifugal casting operations 358 (approximately 80% of facilities) would have to record for low HAP resins; 2) facilities with add-on controls (14 existing RPCs per year) would have to record add-on control devices operating parameters; and 3) all facilities (448) need to keep records of its work practices. Since operating parameters for control equipment and standard work practices are already monitored by industry for other purposes, we are not attributing these burdens to the rule.

^j We have assumed that the amount of time it takes a respondent to train its employees would vary with the number of employees at its facility. We have also assumed that the distribution in size of the new respondents would be identical to that of the existing RPC universe. Therefore, we have assumed that 82 percent of the respondents would be small business (i.e., 380.8 existing RPCs per year, 11 percent (i.e. 49.28 existing RPCs per year), would be medium business, and 7 percent (i.e., 31.36 existing RPCs) are large business. Furthermore, we have assumed that respondents will only provide full training to new employees (0 respondents); we assume that, for existing respondents, it will take 20 percent of the time it takes to train new employees.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (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 (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ ^b
Notification of applicability ^a	2	1	2	0	0	0	0	\$0
Notification of intent to construct a major source and review application	12	1	12	0	0	0	0	\$0
Notification of start of construction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial performance test and test plan	12	1.2	14.4	0	0	0	0	\$0
Report of performance test results including operating parameters	12	1.2	14.4	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Review reports of excess emissions ^c	4	2	8	89.6	716.8	4.48	71.68	\$37,129.30
Review reports of no excess emissions ^c	2	2	4	358.4	1433.6	17.92	143.36	\$74,847.36
Review of startup, shutdown, malfunction report ^d	4	1	4	14	56	0.7	5.6	\$2,923.73
TOTAL ANNUAL BURDEN AND COST (rounded) ^e					2,450			\$115,000

Assumptions:

^a There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be no new RPC facilities each year over the three year period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small business, 11 percent are medium size facilities and 7 percent are large facilities. Furthermore, we have assumed that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of five groups of operations.

^b This cost is based on the following labor rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM), 2018 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.

^c We have assumed that approximately 80 percent (or 358.4) of the respondents will report no excess emissions twice a year and approximately 20 percent

(or 89.6) will report excess emissions twice a year.

^d We have assumed that all RPC facilities with add-on controls (3% or 14 existing facilities) will have at least one startup, shutdown, or malfunction occurrence that is not managed according to the plan.

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