

**Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR P.**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
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 <sup>c</sup>			
i. Facilities with 4 groups of operations	1.00	1	1
ii. Facilities with 5 groups of operations	1.25	1	1
B. Required activities: Sources with add-on controls			
i. Initial performance test <sup>d</sup>	320	1	320
ii. Repeat of performance test	320	1	320
iii. Operation, maintenance, monitoring plan	40	1	40
iv. Startup, shutdown, malfunction plan	20	1	20
v. Monitoring of operating parameters and equipment <sup>e</sup>	See 5E		
C. Gather Existing Information	See 5D, 5E		
D. Write report <sup>a</sup>			
i. Notification of compliance status <sup>d</sup>	4	1	4
ii. Notification of construction/ reconstruction <sup>a, d</sup>	2	1	2
iii. Notification of actual startup <sup>d</sup>	2	1	2
iv. Notification of performance test <sup>d</sup>	2	1	2
v. Reports of performance test results	See 4B		
vii. Report of exceedances <sup>g</sup>	16	2	32
viii. Report of no exceedances <sup>g</sup>	8	2	16
ix. Startup, shutdown, malfunction report <sup>h</sup>	2	1	2
<b>Subtotal for Reporting Requirements</b>			
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): <sup>i</sup>			
i. System for low HAP resin	4	1	4
ii. System for work practices	1	1	1
iii. System for add-on control devices	2	1	2
E. Time to enter and transmit all information into record system <sup>i</sup>			
i. Enter information on low HAP resin	10	1	10
ii. Enter information on work practices and operating parameters	N/A		
F. Develop operator training course and keep records of operators taken it <sup>d</sup>	10	1	10
G. Time to train personnel: <sup>j</sup>			

i. Small facilities (less than 100 employees)	2	1	2
	0.4	1	0.4
ii. Medium facilities (100-250 employees)	4	1	4
	0.8	1	0.8
iii. Large facilities (more than 250 employees)	8	1	8
	1.6	1	1.6
H. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>k</sup>:</b>			
<b>Capital and O&amp;M Cost (rounded)<sup>k</sup>:</b>			
<b>TOTAL COST (rounded)<sup>k</sup>:</b>			

**Assumptions:**

<sup>a</sup> There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW year period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small business, 11 percent are n that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 p from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupa rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed 93% of respondents have 4 groups of operations and 7% of respondents have 5 groups of operations.

<sup>d</sup> We have assumed no new respondents over the next three years due to trends in industry consolidation. Because there are

<sup>e</sup> Monitoring and recordkeeping of operations for respondents with enclosures and add-on control devices include: 1) specifi 2) start-up, shutdown, and malfunctions of equipment, and 3) work practices.

<sup>f</sup> Monitoring and recordkeeping of operations for respondents that comply by limiting the HAP content of their raw material material and the weighted-average HAP content over the past 12 months, and 2) work practices. However, if all the materia to record HAP content and would not need to track monthly consumption or record the computations. For open molding an among thirteen different processes (open molding) and two different processes (centrifugal casting to calculate the monthly centrifugal casting operations).

<sup>g</sup> We have assumed that approximately 80 percent of the 448 (or 358.4) existing respondents will report no excess emission twice a year.

<sup>h</sup> We have assumed that all RPC facilities with add-on controls (approximately 3% or 14 facilities) will have at least one sta

<sup>i</sup> New respondents (0) would be required to develop a record system and existing respondents would be required to record o facilities with open molding and/or centrifugal casting operations 358 (approximately 80% of facilities) would have to recor would have to record add-on control devices operating parameters; and 3) all facilities (448) need to keep records of its worl practices are already monitored by industry for other purposes, we are not attributing these burdens to the rule.

<sup>j</sup> We have assumed that the amount of time it takes a respondent to train its employees would vary with the number of empl respondents would be identical to that of the existing RPC universe. Therefore, we have assumed that 82 percent of the resp 49.28 existing RPCs per year), would be medium business, and 7 percent (i.e., 31.36 existing RPCs) are large business. Fur employees (0 respondents); we assume that, for existing respondents, it will take 20 percent of the time it takes to train new

<sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

art 63, Subpart WWWW) (Renewal)

(D)	117.92 (E)	147.4 (F)	57.02 (G)	(H)	
Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ <sup>b</sup>	
416.64	416.64	20.83	41.66	\$54,576.5	Updated to apply to add resopndents,
31.36	39.20	1.96	3.92	\$5,134.9	Updated to apply to add resopndents,
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
89.60	2867.20	143.36	286.72	\$375,580.3	Updated # of respondents based on ne
358.40	5734.40	286.72	573.44	\$751,160.52	Updated # of respondents based on ne
14.00	28.00	1.40	2.80	\$3,668	Updated # of respondents based on ne
	<b>10,448</b>			<b>\$1,190,120</b>	
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
0	0	0	0	\$0	Removed new respondents
358	3580	179	358	\$468,951.36	Updated # of respondents based on ne
0	0	0	0	\$0	

0	0	0	0	\$0	Removed new respondents
367.36	146.94	7.35	14.69	\$19,248.49	Updated # of respondents based on ne
0	0	0	0	\$0	Removed new respondents
49.28	39.42	1.97	3.94	\$5,164.23	Updated # of respondents based on ne
0	0	0	0	\$0	Removed new respondents
31.36	50.18	2.51	5.02	\$6,572.65	Updated # of respondents based on ne
		<b>4,389</b>		<b>\$499,937</b>	
		<b>14,800</b>		<b>\$1,690,000</b>	
				<b>\$468,000</b>	
				<b>\$2,160,000</b>	

7. We have assumed that there will be no new RPC facilities each year over the three medium size facilities and 7 percent are large facilities. Furthermore, we have assumed five groups of operations.

per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are national and Industry group." The rates are from column 1: "Total Compensation." The

no new respondents, we expect no burden for this requirement.

ic operating parameters for each control device established during the performance test,

s include: 1) monitoring and recording in a spreadsheet the monthly consumption of HAPs in an operation meet the HAP content limit, then each respondent would need only one centrifugal casting operations, respondents would also have the option of averaging the average of the actual and allowable emissions for the combined open molding and

s twice a year and approximately 20 percent (or 89.6) will report excess emissions

start-up, shutdown or malfunction (SSM) that is not managed according to the SSM plan.

operational data. For existing respondents, the following monitoring is required: 1) monitoring for low HAP resins; 2) facilities with add-on controls (14 existing RPCs per year) and best practices. Since operating parameters for control equipment and standard work

employees at its facility. We have also assumed that the distribution in size of the new respondents would be small business (i.e., 380.8 existing RPCs per year, 11 percent (i.e. 11 percent). Furthermore, we have assumed that respondents will only provide full training to new employees.

adjusted hours from 12 to 1 since it will take less time for sources to familiarize themselves with the rule.  
adjusted hours from 13 to 1.25 since it will take less time for sources to familiarize themselves with the rule.

w inventory and prior percentage assumptions  
w inventory and prior percentage assumptions  
w inventory and prior percentage assumptions

w inventory and prior percentage assumptions

w inventory and prior percentage assumptions

w inventory and prior percentage assumptions

w inventory and prior percentage assumptions

hrs/reponse

Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Pro

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
Notification of applicability <sup>a</sup>	2	1	2
Notification of intent to construct a major source and review application	12	1	12
Notification of start of construction	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test and test plan	12	1.2	14.4
Report of performance test results including operating parameters	12	1.2	14.4
Notification of compliance status	2	1	2
Review reports of excess emissions <sup>c</sup>	4	2	8
Review reports of no excess emissions <sup>c</sup>	2	2	4
Review of startup, shutdown, malfunction report <sup>d</sup>	4	1	4
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>e</sup></b>			

**Assumptions:**

<sup>a</sup> There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WV period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small business, 11 percent are n percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of fi

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical + 60%). These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes lo packages available to government employees.

<sup>c</sup> We have assumed that approximately 80 percent (or 358.4) of the respondents will report no excess emissions twice :

<sup>d</sup> We have assumed that all RPC facilities with add-on controls (3% or 14 existing facilities) will have at least one sta

<sup>e</sup>Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

duction (40 CFR Part 63, Subpart WWWW) (Renewal)

	48.75	65.71	26.38		
(D)	(E)	(F)	(G)	(H)	
Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ <sup>b</sup>	
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
0	0	0	0	\$0	Removed new response
89.6	716.8	4.48	71.68	\$37,129.30	Updated # of responses
358.4	1433.6	17.92	143.36	\$74,847.36	Updated # of responses
14	56	0.7	5.6	\$2,923.73	Updated # of responses
		<b>2,450</b>		<b>\$115,000</b>	

WWW. We have assumed that there will be no new RPC facilities each year over the three year medium size facilities and 7 percent are large facilities. Furthermore, we have assumed that 93 ve groups of operations.

rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 quality rates of pay. The rates have been increased by 60 percent to account for the benefit

a year and approximately 20 percent (or 89.6) will report excess emissions twice a year.

rtup, shutdown, or malfunction occurrence that is not managed according to the plan.



nts

nts

nts

nts

nts

nts

nts

ts based on new inventory and prior percentage assumptions

ts based on new inventory and prior percentage assumptions

ts based on new inventory and prior percentage assumptions

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device <sup>1</sup>	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Response
N/A <sup>2</sup>	0	0	0	\$20.13
SMC enclosure <sup>3</sup>				\$450,000
<b>Total (Rounded) <sup>4</sup></b>				

5

(F) Number of Responses / Source	(G) Total O&M, (E X F)
910	\$18,318
1	\$450,000
	<b>\$468,000</b>