

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 No Longer Subject to the Rule Due to Closure ²	(E) Number of Respondents (E=A+B+C-D)
1	38	9,631	0	10	9,659
2	38	9,659	0	10	9,687
3	38	9,687	0	10	9,715
Average	38	9,659	0	10	9,687

¹ New respondents include sources with constructed, reconstructed, and modified affected facilities.

² On average, ten asbestos-containing waste disposal sites are expected to close over the next three years and will no longer be subject to the rule.

ERG Notes:

Table updated to include new respondents since prev ICR. Existing respondents in Yr 3 of prev ICR = 9,631 (assumes 8,669 demo/reno; 400 milling, manufacturing, and fabrication; and 560 landfills). This ICR also reflects 2 additional existing respondents at asbestos converting sources.

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
Asbestos converting operations				
Notification and application for construction	0	1	0	0
Report on sample analyses performed during initial 90 days of operation	0	1	0	0
Quarterly operations and monthly sample analysis report	2	4	0	8
Spraying operations				
Notification of commencement of operations using materials containing >1% asbestos	0	1	0	0
Excepted waste shipment report	0	1	0	0
Demolition/renovation				
Notification by U.S. mail of intent to demolish or renovate	7,827	9	0	70,446
Electronic Notification	870	9	0	7,827
Renotification due to change	7,827	2	0	15,655
Malfunction Reports for owners/operators of ACPRPS Using CTPS AWP	22	2	0	44
Excepted waste shipment report	8,697	3	0	26,091
Milling, manufacturing, and fabricating				
Control device maintenance plan	40	1	0	40
Semiannual visible emissions report	400	2	0	800
Excepted waste shipment report	400	1	0	400
New source report	0	1	0	0
Asbestos-containing waste disposal sites				
New source report	10	1	0	10
Waste generator reports	560	1	0	560
Waste disposal discrepancy report	560	1	0	560
Improperly contained waste report	560	2	0	1,120
Notification of excavation of asbestos materials	0	1	0	0
Facility closure report	10	1	0	10
			Total	123,571

Have broke
Have broke
Revised to

Added from

ERG Review
-prev renew

N/A - Not Applicable

hrs/response:

2

Report out demo/reno notifications separately to accurately reflect the total # responses for notifications
Report out demo/reno notifications separately to accurately reflect the total # responses for notifications
match table 1

Table 1

Notes:

Total: 123,299 responses. Net increase due to industry growth.

Table 1: Annual Respondent Burden and Cost – NESHAP for Asbestos (40 CFR Part 61, Subpart M) (Renewal)

Labor Rates: **\$117.92** **\$147.40** **\$57.02 Updated to 2018**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements	1.00	1	1	38	38	1.9	3.8	\$4,977.70
B. Required activities including monitoring or operations	See 3D							
C. Gather existing information	See 3D, 4E							
D. Write reports								
i. Asbestos converting operations								
Notification and application for construction	80	1	80	0	0	0	0	\$0
Report on sample analyses performed during initial 90 days of operation	2	1	2	0	0	0	0	\$0
Quarterly operations and monthly sample analysis report	2	4	8	2	16	1	2	\$2,095.87
ii. Spraying operations ^c								
Notification of commencement of operations using materials containing >1% asbestos	N/A							
Excepted waste shipment report ^d	N/A							
iii. Demolition/renovation								
Notification by US Mail of intent to demolish components	1	9	9	7,827	70,446	3,522.29	7,044.6	\$9,227,823.13
Renotification due to change	0.25	2	0.5	7,827	3,913.7	195.68	391.37	\$512,656.84
Electronic notification	0.25	9	2.3	870	1,956.8	97.84	195.68	\$256,328.42
Excepted waste shipment report ^d	1	3	3	8,697	26,091	1,304.55	2,609.1	\$3,417,712.27
Malfunction report if using CTPS AWP	2	2	4	22	88	4.40	8.8	\$11,527.30
iv. Milling, manufacturing, and fabricating								
Control device maintenance plan ^e	1	1	1	40	40	2	4	\$5,239.68
Semiannual visible emissions report	1	2	2	400	800	40	80	\$104,793.60

Source Type	Existing	New	Closures
Converting	2	0	0
Demo/Reno	8,697	28	0

Electronic Notification 870 Updated the #

ACPRPs using CTPS AWP	2	20	
Mill/Mfg/Fab	400	0	0
Waste disposal	560	10	10
Total	9,659	38	10

Updated # of each respondent to account for grow

ERG Notes: 9,687

Table 1 revised to address several inconsistencies identified in the previous ICR.

Assumes a reduction of 3 (from 9 to 6) annual occurrences per respondent

Reflects a new incidence of 3 electronic notifications annually per respondent

Reflects 2 companies having up to 2 malfunction reports annually.

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
Excepted waste shipment report ^d	0.1	1	0.1	400	40	2	4	\$5,239.68
New source report	1	1	1	0	0	0	0	\$0
v. Asbestos-containing waste disposal sites								
New source report	1	1	1	10	10	0.5	1	\$1,309.92
Waste generator reports	0.67	1	0.67	560	375.2	18.76	37.52	\$49,148.20
Waste disposal discrepancy report ^f	1.5	1	1.5	560	840	42	84	\$110,033.28
Improperly contained waste report ^{g,h}	1.17	2	2.34	560	1,310.4	65.52	131.04	\$171,651.92
Notification of	2	1	2	0	0	0	0	\$0
Facility closure report	2	1	2	10	20	1	2	\$2,619.84
Reporting Subtotal						121,882		\$13,883,158
4. Recordkeeping requirements								
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information								
i. Asbestos converting operations								
Records of startup performance testing and initial 90 days of operations	0.1	1	0.1	0	0	0	0	\$0.00
Waste shipment records	0.1	12	1.2	2	2.4	0.12	0.24	\$314.38
ii. Spraying operations ^c								
Waste shipment records	N/A							
Excepted waste shipment report ^d	N/A							
iii. Demolition/renovation								
Waste shipment records	0.1	24	2.4	8,697	20,872.8	1,043.64	2,087.28	\$2,734,169.82
Cold weather temperature monitoring ^k	0.1	147	14.7	0	0	0	0	\$0
Excepted waste shipment report ^d	0.1	3	0.3	8,697	2,609.1	130.5	260.91	\$341,771.23
iv. Milling, manufacturing, and fabricating								
Cold weather temperature monitoring ^k	0.1	147	14.7	0	0	0	0	\$0
Daily visible emissions	0.1	637.5	63.75	400	25,500	1,275	2,550	\$3,340,296.00

Electronic Notification

870

Updated the #.

ACPRPs using CTPS AWP

2

20

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
Weekly inspection of air cleaning devices ^l	0.25	127.5	31.88	400	12,750	637.5	1,275	\$1,670,148.00
Waste shipment records	0.1	51	5.1	400	2,040	102	204	\$267,223.68
Excepted waste shipment report ^d	0.1	1	0.1	400	40	2	4	\$5,239.68
v. Asbestos-containing waste disposal sites								
Time to file and mail waste generator reports	See 3D							
Waste shipment records	1.5	12	18	560	10,080	504	1,008	\$1,320,399.36
Waste management data retention until landfill closure	0.5	1	0.5	10	5	0.25	0.5	\$654.96
Record of deed OR utility record notation (if using CTPS AWP) once inactive	0.5	1	0.5	10	5	0.25	0.5	\$654.96
F. Time to train personnel								
i. Asbestos converting operations	N/A							
ii. Spraying operations ^c	N/A							
iii. Demolition/renovation (refresher training) ^m	8	1	8	8,725	69,800	3,490.0	6,980.0	\$9,143,241.60
iv. Milling, manufacturing, and fabricating ⁿ	N/A							
v. Asbestos-containing waste disposal sites ^o	N/A							
G. Time for audits	N/A							
Recordkeeping Subtotal						165,260		\$18,824,114
TOTAL ANNUAL BURDEN AND COST (ROUNDED)						287,000		\$32,700,000
TOTAL ANNUAL CAPITAL AND O&M COST (SEE SECTION 6(b) (iii))								\$0
GRAND TOTAL (LABOR, CAPITAL, AND O&M)								\$32,700,000

Electronic Notification 870 Updated the #

ACPRPs using CTPS AWP 2 20

Prev renewal: 292,051 hrs and \$29,369,054. Net increase in costs due to changes (in

N/A - Not Applicable

Assumptions:

	A	B	C	D	E	F	G	H
Burden item	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b

Electronic Notification	870		Updated the #
ACPRPs using CTPS AWP	2	20	

a EPA estimates an average of 9,659 existing sources will be subject to the rule over the next 3 years. On average during this period, 38 new sources per year will become subject, while 10 existing sources per year will close and will cease to be subject to the rule. The net total is 9,687 sources per year (9,659 + 38 - 10 = 9,687).

The following is a detailed breakdown of the four source categories:

- 1) 2 existing asbestos converting sources. No new sources are expected.
- 2) 8,697 existing asbestos demolition/renovation sources. Approximately 10% of these will adopt electronic reporting within the next 3 years. EPA assumes an increase of 28 new sources per year.
- 3) 2 companies in 2019, 10 companies in 2020, and 20 companies in 2021 (3-year average 10 companies) will use CTPS to conduct ACPRPs.
- 4) 400 existing asbestos milling, manufacturing, and fabricating sources. No new sources are expected.
- 5) Approximately 560 sources will receive asbestos-containing wastes subject to the rule. No net growth will occur because an estimated 10 sites will close annually, while an estimated 10 sites will become subject to the rule by commencing acceptance of asbestos-containing wastes.

Updated footnote

b This ICR uses the following labor rates: \$117.92 (technical), \$147.40 (managerial), and \$57.02 (clerical). 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." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Updated rates

- c EPA does not expect any spray operation sources will become subject to the rule over the next three years.
- d Report notifying EPA that waste shipment records signed by owners/operators of disposal sites were not received by waste generators within 45 days of the date of waste acceptance by initial transporters.
- e The rule requires sources to submit a control device maintenance plan for any air cleaning devices that cannot be inspected on a weekly basis. EPA assumes 10% of sources will submit such maintenance plans.
- f Sources are required to submit reports if discrepancies between designated waste shipment and actual received quantities are not resolved with waste generators.
- g Active waste disposal sites are required to report the presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers, and submit the waste shipment record.
- h EPA assumes respondents will submit reports for improperly contained waste twice per year.
- i EPA assumes asbestos-containing waste will not be excavated at any disposal site.
- j EPA assumes approximately 4 million cubic yards of waste shipments will be recorded annually for all demolition/renovation contractors, and that each load will be about 20 cubic yards. This would result in approximately 200,000 loads annually (4 million cubic yards/20 cubic yards per load). We estimate approximately 24 loads per contractor per year.
- k Based on Agency experience with the rule, operations generally cease from late fall into winter. We thus assume the burden for this activity will be negligible.
- l EPA assumes sources will have an average of 2.5 control devices requiring monitoring, and that will operate for 255 days over 51 weeks, annually.
- m EPA assumes all existing contractors (8,697) and new contractors entering the market for the first time (28) will spend resources annually on training due to employee turnover and new hires.
- n EPA anticipates there will be no direct costs to respondents to train inspectors for Method 9 certification for daily visible emissions monitoring.
- o EPA anticipates there will be no burden for waste disposal-related training.

Updated footnote

Source Type	Existing	New	Closures
Converting	2	0	0
Demo/Reno	8,697	28	0
Mill/Mfg/Fab	400	0	0
Waste disposal	560	10	10
Total	9,659	38	10

Table 2: Average Annual EPA Burden and Cost – NESHAP for Asbestos (40 CFR Part

Labor Rates: \$48.75

Burden item	A	B	C	D	E
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)
1. Asbestos converting operations					
A. Notification and application for construction	80	1	80	0	0
B. Report on sample analyses performed during initial 90 days of operation	1	1	1	0	0
C. Quarterly operations and monthly sample analysis	0.5	4	2	2	4
2. Spraying operations ^c					
A. Notification of commencement of operations using materials containing >1% asbestos	N/A				
B. Excepted waste shipment report	N/A				
3. Demolition/renovation					
A. Notification by US Mail of intent to demolish or renovate	0.25	6	1.50	7,827	11,740.95
B. Electronic Notification	0.1	3	0.25	870	217.43
C. Renotification due to change	0.25	2	0.5	7,827	3,913.7
D. Excepted waste shipment report	0.5	3	1.5	8,697	13,045.5
E. CTPS AWP Malfunction report	0.25	2	0.5	22	11.0
4. Milling, manufacturing, and fabricating					
A. Control device maintenance plan	0.25	1	0.25	40	10
B. Semiannual visible emissions report	0.1	2	0.2	400	80
C. Excepted waste shipment report	0.5	1	0.5	400	200
D. New source report	0.5	1	0.5	0	0
5. Asbestos-containing waste disposal sites					
A. New source report	0.5	1	0.5	10	5
B. Waste generator reports	4	1	4	560	2,240
C. Waste disposal discrepancy report	0.5	1	0.5	560	280

D. Improperly contained waste report	0.5	2	1	560	560
E. Notification of excavation of asbestos materials	2	1	2	0	0
F. Facility closure report	1	1	1	10	10
TOTAL ANNUAL BURDEN AND COST (ROUNDED)					37,200

N/A - Not Applicable

Assumptions:

a EPA estimates an average of 9,659 existing sources will be subject to the rule over the next 3 years. On average 10 existing sources per year will close and will cease to be subject to the rule. The net increase is 9,687).

The following is a detailed breakdown of the four source categories:

- 1) 2 existing asbestos converting sources. No new sources are expected.
- 2) 8,697 existing asbestos demolition/renovation sources. Approximately 10% of these will adopt electronic reporting, resulting in an increase of 28 new sources per year.
- 3) 2 companies in 2019, 10 companies in 2020, and 20 companies in 2021 (3-year average 10 companies) will use asbestos in repair and fabricating sources. No new sources are expected.
- 5) Approximately 563 sources will receive asbestos-containing wastes subject to the rule. No net growth will occur annually, while an estimated 10 sites will become subject to the rule by commencing acceptance of asbestos-containing wastes.

b This ICR uses the following labor rates: \$48.75 (technical), \$65.71 (managerial), and \$26.38 (clerical). These rates are based on the Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 10%.

c EPA does not expect any spray operation sources will become subject to the rule over the next three years.

61, Subpart M) (Renewal)

\$65.71 \$26.83 Updated to 2018

F	G	H
Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
0	0	\$0
0	0	\$0
0.2	0.4	\$218.87
587.05	1,174.10	\$642,447.17
10.87	21.74	\$11,897.17
195.68	391.37	\$214,149.06
652.28	1,304.55	\$713,830.19
0.55	1.10	\$601.90
0.5	1	\$547.19
4	8	\$4,377.48
10	20	\$10,943.70
0	0	\$0
0.25	0.5	\$273.59
112	224	\$122,569.44
14	28	\$15,321.18

ERG Notes:

Table 2 revised to address several inconsistencies identified in the previous version.

EPA Notes:

Electronic notifications added

CTPS AWP malfunction reports added

28	56	\$30,642.36
0	0	\$0
0.5	1	\$547.19
		\$1,770,000

Prev renewal: 45,993 hrs and \$2,093,299. Net increase due to industry gr

8800

ge during this period, 38 new sources per year
 et total is 9,687 sources per year (9,659 + 38 -

orting within the next 3 years. EPA assumes

se CTPS to conduct ACPRPs.

) 403 existing asbestos milling, manufacturing,

occur because an estimated 10 sites will close
 retaining wastes.

rates are from the Office of Personnel

ed by 60 percent to account for the benefit

us ICR.

owth.

No Capital/Startup and O&M costs for this ICR.

RESPONDENT Burden item	FEB 2018 CALCS	JUL 2018 CALCS
	H	H
	Annual cost (\$) ^b	Annual cost (\$) ^b
1. Applications		
2. Surveys and studies		
3. Reporting requirements		
A. Read instructions	4,394.53	4,977.70
B. Required activities including monitoring or operations		
C. Gather existing information		
D. Write reports		
i. Asbestos converting operations		
Notification and application for construction	0	0
Report on sample analyses performed during initial 90 days of operation	0	0
Quarterly operations and monthly sample analysis	1,850	2,096
ii. Spraying operations ^c		
Notification of commencement of operations using materials containing >1% asbestos		
Excepted waste shipment		
iii. Demolition/renovation ^d		
Notification by US Mail of intent to demolish or renovate	8,964,492.22	9,227,823.13
Renotification due to change	498,027.35	512,656.84
Electronic notification	N/A	256,328.42
Excepted waste shipment	2,988,164.07	3,417,712.27
Malfunction report if using CTPS AWP	N/A	11,527.30
iv. Milling, manufacturing, and fabricating		
Control device maintenance	4,625.82	5,239.68
Semiannual visible emissions plan ^e	92,516.4	104,793.6
Excepted waste shipment	4,625.82	5,239.68
New source report ^d	0	0
v. Asbestos-containing waste disposal sites		
New source report	1,156.46	1,309.92
Waste generator reports	43,390.19	49,148.20
Waste disposal discrepancy	97,142.22	110,033.28
Improperly contained waste report ^{f, g, h}	151,541.86	171,651.92
Notification of excavation of asbestos materials ⁱ	0	0
Facility closure report	2,312.91	2,619.84

Reporting Subtotal	12,854,240	13,883,158
4. Recordkeeping requirements		
A. Read instructions		
B. Plan activities		
C. Implement activities		
D. Develop record system		
E. Time to enter and transmit information		
i. Asbestos converting operations		
Records of startup performance testing and initial 90 days of operations	0	0
Waste shipment records	277.55	314.38
ii. Spraying operations ^c		
Waste shipment records		
Excepted waste shipment report ^d		
iii. Demolition/renovation		
Waste shipment records ^j	2,390,531.26	2,734,169.82
Cold weather temperature monitoring ^k	0	0
Excepted waste shipment report ^d	298,816.41	319,632.60
iv. Milling, manufacturing, and fabricating		
Cold weather temperature monitoring ^k	0	0
Daily visible emissions ^l	2,948,960.25	3,340,296.00
Weekly inspection of air cleaning devices ^l	1,474,480.13	1,670,148.00
Waste shipment records	235,916.82	267,223.68
Excepted waste shipment report ^d	4,625.82	5,239.68
v. Asbestos-containing waste disposal sites		
Time to file and mail waste generator reports		
Waste shipment records	1,165,706.64	1,320,399.36
Waste management data retention until landfill closure	578.23	654.96
Record of deed OR utility record notation (if using CTPS AWP) once inactive	578.23	654.96
F. Time to train personnel		
i. Asbestos converting operations		
ii. Spraying operations ^c		
iii. Demolition/renovation (refresher training) ^m	7,994,342.12	9,143,241.60
iv. Milling, manufacturing, and fabricating ⁿ		
v. Asbestos-containing waste disposal sites ^o		
G. Time for audits		

<i>Recordkeeping Subtotal</i>	16,514,813	18,824,114
TOTAL ANNUAL BURDEN AND COST (ROUNDED)	29,369,054	27,297,727
TOTAL ANNUAL CAPITAL AND O&M COST (SEE SECTION 6(b)(iii))	0	0
GRAND TOTAL (LABOR, CAPITAL, AND O&M)	\$ 29,369,053.63	\$ 32,700,000.00

N/A - Not Applicable