

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Renewal), EPA ICR Number 2029.08, OMB Control Number 2060-0520.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asphalt Processing and Asphalt Roofing Manufacturing were proposed on November 21, 2001 (66 *FR* 58609), promulgated on May 7, 2003 (68 *FR* 24561), and amended on May 17, 2005 (70 *FR* 28360). These regulations apply to both existing facilities and new facilities that manufacture asphalt roofing products or oxidized asphalt that are major sources of hazardous air pollutants (HAPs) or are collocated at major sources. New facilities include those that commenced construction or reconstruction after the date of the original proposal (November 21, 2001). This information is being collected to assure compliance with 40 CFR Part 63, Subpart LLLLL.

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 40 CFR Part 63 shall maintain a file containing these documents and retain the file for at least five years following the generation date of such reports and records. All reports are sent to the delegated state or local authority. If the event that 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 major source asphalt processing or asphalt roofing manufacturing facilities. The ‘burden’ to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Renewal). The ‘burden’ to the Federal Government 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 Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Renewal). All of these facilities are privately-owned, for-profit businesses. None of the facilities in the United States are owned by either state, local, tribal or the Federal governments.

Over the next three years, approximately 8 major source facilities will be subject to these standards, and no additional facility per year will become subject to these same standards. Four of the 8 major facilities are strictly asphalt processing facilities, and the other four operate an asphalt processing facility collocated with an asphalt roofing manufacturing facility. In addition, we assume there is no industry growth.

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

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 HAP. These standards are applicable to new or existing sources of HAP 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, HAP emissions from facilities that manufacture asphalt roofing products or oxidized asphalt 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 LLLLLL.

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 and ongoing capability to comply with these emission standards. During the performance tests a

record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance.

The notifications required in these 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 that the 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 LLLLLL.

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*.

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 the EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 8 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to

comment on the burden associated with these standards as it was being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Asphalt Roofing Manufacturers Association (ARMA), at (202) 207-1107, and the Asphalt Institute, at (859) 288-4976. Our industry contacts confirmed that there has been no growth in the number of major source facilities and that no new facilities are expected in the next three years.

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 that emission limitations are met. If the information required by these standards was collected less frequently, then the likelihood of detecting poor operation and maintenance of control equipment and noncompliance 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 either 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 facilities that manufacture asphalt roofing products or oxidized asphalt. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by these standards are listed in the table below:

Standard (40 CFR Part 63, Subpart LLLLL)	SIC Codes	NAICS Codes
Asphalt Shingle and Coating Materials Manufacturing	2952	324122
Petroleum Refineries	2911	324110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL).

A source must make the following reports:

Notifications	
Initial notification requirements	§§ 63.9(b), 63.8692(b)-(c)
Notification of compliance status	§§ 63.9(h)(2)-(5), 63.8692(e)
Notification that source is subject to special compliance requirements, if applicable	§ 63.9(d)
Notification of performance test 1	§§ 63.7(b), 63.9(e), 63.8692(d)
Rescheduled of performance test	§ 63.7(b)(2)
Notification of opacity and visible emission observations	§ 63.9(f)
Change in information already provided	§ 63.9(j)

Notifications	
Request for an extension of compliance with relevant standard	§ 63.9(c)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§ 63.5(6)(d)
Performance test results	§ 63.10(d)(2)
Startup, shutdown and malfunction plan	§ 63.6(e)(3)
Periodic startup, shutdown, and malfunction reports	§ 63.10(d)(5)(i)
Progress reports for compliance extension (if applicable)	§ 63.6(i)1
Semiannual compliance reports	§ 63.8693(b)

A source must keep the following records:

Recordkeeping	
Startup, shutdown and malfunction plan	§§ 63.6(e)(3), 63.8694(a)(2)
All reports and notifications	§§ 63.10(b)(1), 63.8694(a)(1)
Records of startup, shutdown, and malfunction of process equipment	§§ 63.10(b)(2)(i), (iv-v), 63.8694(a)(2)
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	§§ 63.10(b)(3)
Records of maintenance of air pollution control equipment	§ 63.10(b)(2)(iii)
Records of performance tests, performance evaluations, and opacity and visible emissions observations	§§ 63.10(b)(2)(viii), 63.8694(a)(3), 63.8694(b), 63.6(h)(6)
Five-year retention of records	§§ 63.10(b)(1), 1 63.8695(b)

Electronic Reporting

Currently, 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.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop, liquid supply pressure, inlet temperature, oxidizer chamber temperature, and voltage for control devices.
Perform initial performance test and repeat performance tests if necessary.
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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
Observe initial performance tests, review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

Agency Activities

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 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 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

There are no small entities (i.e., small businesses) affected by this regulation. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulations. 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 Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLLL) (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 3,970 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, the EPA's recent re-evaluation of the source category inventory under the EPA's efforts to prepare amendments to the rulemaking under the risk and technology review, 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 continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other such costs as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M,
PM control device	\$7,000	0	\$0	\$5,000	4	\$20,000
Thermal oxidizer	\$25,000	0	\$0	NA	0	\$0
Photocopy / postage				\$15	8	\$120
Total			0			\$20,000

NA – not applicable; EPA assumes that all facilities subject to the standard have or will obtain add-on control devices that are already equipped with continuous parameter monitoring equipment. This monitoring equipment is required not only for compliance purposes but also to operate the control equipment.

^a The estimated contractor cost for initial performance tests of a PM control device using EPA Method 5A is \$7,000. The ongoing cost for replacement filters and data collection system maintenance is \$5,000.

^b The PM limit applies only to asphalt roofing manufacturing facilities, and there are four existing asphalt roofing manufacturing facilities, with no new asphalt roofing manufacturing facilities projected for the three years of this information collection.

^c The estimated contractor cost for initial performance tests of a thermal oxidizer; using EPA Method 25A is \$25,000.

^d The photocopying and postage cost is \$7.50 per semiannual report, for a total of \$15 per respondent per year.

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 \$20,000. 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 \$20,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with observation of performance tests and analysis of reported information. The 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 \$7,220.

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 Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (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 8 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 8 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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

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 8.

The 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 $E=(B \times C)+D$
Notification of compliance status	0	1	0	0
Notification of intent to construct a major source and review application	0	1	0	0
Notification of initial construction/ reconstruction	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	1.2	0	0
Report of semiannual compliance reports	8	2	0	16
Report of startup, shutdown, malfunction	1	1	1	1
			Total	17

The number of Total Annual Responses is 17.

The total annual labor costs are \$452,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (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 3,970. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (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 is estimated to average 234 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$20,000. 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 152 labor hours at a cost of \$7,220; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Renewal).

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

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates is due to more accurate estimates of existing sources based on EPA's recent re-evaluation of the source category inventory, which indicated that several facilities have shut down since the last ICR renewal period. These changes result in an overall decrease in the labor hours and O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 234 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-2014-0087. 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-2014-0087 and OMB Control Number 2060-0520 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 Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (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-hour / year (E=CxD)	Management person-hour / year (Ex0.05)	Clerical (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								
New Respondents	25	1	25	0	0	0	0	\$0
Existing Respondents	1	1	1	8	8	0.4	0.8	\$1,047.89
B. Required activities:								
New Respondents ^{c, d}								
i. Initial performance test	24	1	24	0	0	0	0	\$0
ii. Repeat of initial performance test ^e	24	0.2	4.8	0	0	0	0	\$0
iii. Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	\$0
New and Existing Respondents								
iv. Monitoring of operating parameters and equipment: ^f	Included in 5E							
C. Gather Existing Information	Included in 5D, 5E							
D. Write report ^{c, d}								
i. Notification of compliance status	4	1	4	0	0	0	0	\$0
ii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	\$0

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-hour / year (E=CxD)	Management person-hour / year (Ex0.05)	Clerical (Ex0.1)	Cost, \$ ^b
iii. Notification of initial construction/ reconstruction ^a	4	1	4	0	0	0	0	\$0
iv. Notification of actual startup	4	1	4	0	0	0	0	\$0
v. Notification of performance test	4	1	4	0	0	0	0	\$0
vi. Reports of performance test results	Included in 4B, 5E							
vii. Semiannual compliance reports ^d	12	2	24	8	192	9.6	19.2	\$25,149.40
viii. Startup, shutdown, malfunction report ^g	8	1	8	1	8	0.4	0.8	\$1,047.89
Subtotal for Reporting Requirements					239			\$27,245
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	10	1	10	0	0	0	0	\$0
C. Implement activities	Included in 4B							
D. Develop record system ^h	NA							
E. Time to enter and transmit all information into record system ⁱ								
i. Record performance tests	4	1	4	0	0	0	0	\$0
ii. Record operating parameters	1	365	365	8	2,920	146	292	\$382,480.43
iii Record malfunctions	2	1	2	1	2	0.1	0.2	\$261.97
iv. Continuous parameter monitoring calibration and maintenance	4	5	20	8	160	8	16	\$20,957.83
v. Store, file, and maintain records	20	1	20	8	160	8	16	\$20,957.83
F. Time to train personnel	16	1	16	0	0	0	0	\$0

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-hour / year (E=CxD)	Management person-hour / year (Ex0.05)	Clerical (Ex0.1)	Cost, \$ ^b
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						3,728		\$424,658
TOTAL LABOR BURDEN AND COST (rounded) ^j						3,970		\$452,000
TOTAL CAPITAL AND O&M COST ^j								\$20,000
TOTAL COST (rounded) ^j								\$472,000

^a There is an average of 8 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility per year will become subject to this regulation.

^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 New respondents would have to comply with the initial rule requirements including notifications and performance tests for add-on control devices and preparation of the startup, shutdown and malfunction (SSM) plans. There are no new respondents anticipated over the next three-year period of this ICR, therefore, there is no anticipated burden associated with these activities.

^d We have assumed that the initial performance tests and reports are conducted by an emissions testing contractor, however, facility personnel will also work on-site to assist the contractor.

^e We have assumed that 20 percent of new respondents will have to repeat the performance tests due to failure. Since there are no new respondents estimated, this requirement does not apply.

^f Monitoring and recordkeeping of operations for respondents with 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.

^g We have assumed that one respondent with add-on controls per year will have at least one startup, shutdown or malfunction (SSM) event that is not managed according to the SSM plan.

^h We have assumed that new respondents already have the technology and recordkeeping systems in place to monitor its daily operations and to comply with existing regulations.

ⁱ We have assumed that it takes respondents the following approximate times to meet recordkeeping requirements: 1) one hour per day for recording operating parameters, 365 days per year; 2) four hours per year to calibrate and provide maintenance to continuous parameter monitors five times per year; and 3) and 16

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-hour / year (E=CxD)	Management person-hour / year (Ex0.05)	Clerical (Ex0.1)	Cost, \$ ^b

hours per year to train new employees on add-on control devices, continuous parameter monitoring technology and requirements, and review and implementation of startup, shutdown, and malfunction plans.

^j 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 Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (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
New Respondents: ^c								
i. Notification of compliance status	4	1	4	0	0	0	0	\$0
ii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	\$0
iii. Notification of start of construction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of initial performance test and test plan	4	1	4	0	0	0	0	\$0
New and Existing Respondents								
i. Report of performance test results including operating parameters	20	1	20	0	0	0	0	\$0
ii. Review of semiannual compliance reports	8	2	16	8	128	6.4	12.8	\$6,998.53
iii. Review of startup, shutdown, malfunction reports ^d	4	1	4	1	4	0.2	0.4	\$218.70
TOTAL ANNUAL BURDEN AND COST (rounded) ^e					152			\$7,220

^a There is an average of 8 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility per year will become subject to this regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5), Technical rate of \$48.75 (GS-12, Step 1), and Clerical rate of \$26.38 (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) 2018 General Schedule which excludes locality rates of pay.

^c New respondents are required to conduct performance test for add-on control equipment, submit initial notifications and prepare startup, shutdown and malfunction (SSM) plans. There are no new respondents anticipated over the next three-year period of this ICR, therefore, there is no anticipated burden associated with these activities.

^d Sources are required to submit SSM reports if there is an occurrence that is not managed according to the SSM plan. We have assumed that one respondent with add-on controls per year will have at least one SSM event that is not managed according to the SSM plan.

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