

Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roo

Burden item	(A)	(B)	(C)	(D)
	Person-hours per occurrence	No. Of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a
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
Existing Respondents	1	1	1	8
B. Required activities:				
New Respondents ^{c, d}				
i. Initial performance test	24	1	24	0
ii. Repeat of initial performance test ^e	24	0.2	4.8	0
iii. Startup, shutdown, malfunction plan	40	1	40	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
ii. Notification of intent to construct a major source and review application	4	1	4	0
iii. Notification of initial construction/reconstruction ^a	4	1	4	0
iv. Notification of actual startup	4	1	4	0
v. Notification of performance test	4	1	4	0
vi. Reports of performance test results	Included in 4B, 5E			
vii. Semiannual compliance reports ^d	12	2	24	8
viii. Startup, shutdown, malfunction report ^g	8	1	8	1
Subtotal for Reporting Requirements				
5. Recordkeeping Requirements				
A. Read instructions	Included in 4A			
B. Plan activities	10	1	10	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
ii. Record operating parameters	1	365	365	8

iii Record malfunctions	2	1	2	1
iv. Continuous parameter monitoring calibration and maintenance	4	5	20	8
v. Store, file, and maintain records	20	1	20	8
F. Time to train personnel	16	1	16	0
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ^j				
TOTAL CAPITAL AND O&M COST ^j				
TOTAL COST (rounded) ^j				

Assumptions:

- ^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 respondents will be added over the next three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Non-Executive, Non-Managerial labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupational Group, by 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 a malfunction (SSM) plans. There are no new respondents anticipated over the next three-year period of this ICR, therefore, there are no new respondents to be included in the analysis.
- ^d We have assumed that the initial performance tests and reports are conducted by an emissions testing contractor, however, future testing and reporting will be done by the respondent.
- ^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 anticipated over the next three-year period of this ICR, therefore, there are no new respondents to be included in the analysis.
- ^f Monitoring and recordkeeping of operations for respondents with add-on control devices include: 1) specific operating parameters, 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 over the next three-year period of this ICR.
- ^h We have assumed that new respondents already have the technology and recordkeeping systems in place to monitor its daily operations.
- ⁱ We have assumed that it takes respondents the following approximate times to meet recordkeeping requirements: 1) one hour per year to calibrate and provide maintenance to continuous parameter monitors five times per year; and 3) and 16 hours per year for 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.

ing Manufacturing (40 CFR Part 63, Subpart LLLL)

\$117.92 \$147.40 \$57.02

(E)	(F)	(G)	(H)
Technical person-hour / year (E=CxD)	Management person-hour / year (Ex0.05)	Clerical (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
8	0.4	0.8	\$1,047.89
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
192	9.6	19.2	\$25,149.40
8	0.4	0.8	\$1,047.89
239			\$27,245
0	0	0	\$0
0	0	0	\$0
2,920	146	292	\$382,480.43

(Source: United States Statistics, June 2018, occupational and indu

Labor Type
Mgmt.
Tech.
Cler.

New Respondents
Existing Respondents

2	0.1	0.2	\$261.97
160	8	16	\$20,957.83
160	8	16	\$20,957.83
0	0	0	\$0
3,728			\$424,658
3,970			\$452,000
			\$20,000
			\$472,000

234 hr/response

Each facility per year will become subject to this regulation.

hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the Occupational and Industry group." The rates are from "column 1, Total private industry.

Installation of add-on control devices and preparation of the startup, shutdown and maintenance is no anticipated burden associated with these activities.

Facility personnel will also work on-site to assist the contractor.

For the first 100 new respondents estimated, this requirement does not apply.

1) meters for each control device established during the performance test, 2)

(SSM) event that is not managed according to the SSM plan.

operations and to comply with existing regulations.

1) four hours per day for recording operating parameters, 365 days per year; 2) four hours per year to train new employees on add-on control devices, continuous monitoring systems.

s Department of Labor, Bureau of Labor
“Table 2. Civilian Workers, by
istry group.”)

<u>Total Compensation</u> <u>(\$/hr)</u>	<u>Loaded Rate</u> (Rate + 110%rate)
\$70.19	\$147.40
\$56.15	\$117.92
\$27.15	\$57.02

0

8

Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing

Burden item	(A)	(B)	(C)	(D)
	Person-hours per occurrence	No. Of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a
New Respondents: ^c				
i. Notification of compliance status	4	1	4	0
ii. Notification of intent to construct a major source and review application	4	1	4	0
iii. Notification of start of construction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test and test plan	4	1	4	0
New and Existing Respondents				
i. Report of performance test results including operating parameters	20	1	20	0
ii. Review of semiannual compliance reports	8	2	16	8
iii. Review of startup, shutdown, malfunction reports ^d	4	1	4	1
TOTAL ANNUAL BURDEN AND COST (rounded) ^e				

Assumptions:

^a There is an average of 8 respondents per year over the next three years of this ICR. In addition, we have regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to a (GS-13, Step 5), Technical rate of \$48.75 (GS-12, Step 1), and Clerical rate of \$26.38 (GS-6, Step 3). The General Schedule which excludes locality rates of pay.

^c New respondents are required to conduct performance test for add-on control equipment, submit initial n plans. There are no new respondents anticipated over the next three-year period of this ICR, therefore, the

^d Sources are required to submit SSM reports if there is an occurrence that is not managed according to the 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.

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

\$48.75 \$65.71 \$26.38

Agency Rates
Source: Office of Personn
2017 General Schedule

(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
128	6.4	12.8	\$6,998.53
4	0.2	0.4	\$218.70
152			\$7,220

Labor Type
(GS- 12, step 1) - Tech.
(GS- 13, step 5) - Mgmt.
(GS-6, step 3) - Cler.

New Respondents
Existing Respondents

assumed that no new facility per year will become subject to this

account for government overhead expenses: Managerial rate of \$65.71
se rates are from the Office of Personnel Management (OPM) 2018

otifications and prepare startup, shutdown and malfunction (SSM)
re is no anticipated burden associated with these activities.

e SSM plan. We have assumed that one respondent with add-on controls

el Management (OPM),

Hourly Mean Wage	With Fringe & Overhead
30.47	\$48.75
41.07	\$65.71
16.49	\$26.38

0
8

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
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
PM control device	\$7,000	0	\$0	\$5,000	4
Thermal oxidizer	\$25,000	0	\$0	NA	0
Photocopy / postage				\$15	8
Total			0		

NA – not applicable; EPA assumes that all facilities subject to the standard have or will obtain add-on control dev already equipped with continuous parameter monitoring equipment. This monitoring equipment is required not o 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 \$7,0 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 facilities, with no new asphalt roofing manufacturing facilities projected for the three years of this information co

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

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

(G)
Total O&M
\$20,000
\$0
\$120
\$20,000

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Total Annual Responses

(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
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	0	1
			Total	17

New Respon 0
Existing Re 8