

**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) Residual Risk and Technology Review, EPA ICR Number 1976.06, OMB Control Number 2060-0509.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production were proposed on August 2, 2001, promulgated on April 21, 2003, and amended on August 25, 2005. These regulations apply to existing 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 63, Subpart WWWW.

As part of the residual risk and technology review (RTR) for the Reinforced Plastic Composites Production NESHAP, the Environmental Protection Agency (EPA) is not proposing to revise the emission limit requirements. The EPA is proposing to revise the startup, shutdown, and malfunction (SSM) provisions of the rule and is proposing the use of electronic data reporting for future performance test data submittals, notifications, and reports.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, 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. A semiannual report is also required.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

Based on our consultations with the American Composites Manufacturing Association (ACMA), our search of the Nation Emissions Inventory (NEI), and a review of active air emissions permits, we estimate that there are 448 RPC manufacturing facilities operating in the U.S. subject to the requirements of the RPC Production NESHAP. A complete list of facilities

subject to the NESHAP is available in the risk assessment modeling file, available for review in the docket (Docket ID No. EPA-HQ-OAR-2016-0449).

Over the next 3 years, 448 respondents per year will be subject to the standard, and no additional respondents will become subject to the standard in the next 3 years of the information collection. The industry growth rate is low. The previous ICR (Docket ID No. EPA-HQ-OECA-2013-0339-0006) estimated 568 respondents. The ICR indicated that approximately 600 respondents per year would be subject to the standard, and 16 additional respondents per year would become subject to the standard.

The Office and Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

The burden to the RPC production industry (“Affected Public”) may be found in Tables 1 through 4 of Attachment 1. The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found in Tables 5 through 8 of Attachment 1. In summary, the proposed cost of this ICR to the RPC production industry is \$11,246,000 in labor costs or \$3,749,000 per year if averaged over the first 3 years after the amendments are final. The total Agency cost during the first 3 years of the ICR is estimated to be \$323,100 or \$107,700 per year. The burden includes the cost to Federal EPA and state agencies to implement the proposed amendments.

## **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 or welfare. Therefore, the NESHAP was 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 the standard 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 standard. Continuous emission monitors are used to ensure compliance with the standard 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 the standard 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 the standard 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.

The EPA is proposing that owners and operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of compliance status required in 40 CFR 63.9(h), performance test reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA would develop a template for the reporting form in CEDRI specifically for 40 CFR part 63, subpart VVVV.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also proposing that 40 CFR part 63, subpart VVVV performance test reports be submitted through the EPA's ERT.

The EPA is also proposing to amend 40 CFR part 63, subpart VVVV to remove an exemption from the emission limitations during periods of SSM and to revise the monitoring, recordkeeping, and reporting requirements that are affected by the amendments to the SSM provisions.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

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

WWWW.

### **3(a) Nonduplication**

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, no duplication exists.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

A public notice of this collection is provided in the Federal Register notice of proposed rulemaking entitled, “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites and Boat Manufacturing Residual Risk and Technology Review.”

### **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 the standard, is Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the American Composites Manufacturer's Association (ACMA) at (703) 682-1656.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. EPA received one comment in response to the first Federal Register notice, but the comment did not contain any substantive recommendations and did not result in changes to this ICR.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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 the 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 (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 the standard 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 production facilities. Because the industry includes a wide variety of manufacturing operations, the list of 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 extensive. Some of the industries are represented in the following table.

Standard (40 CFR Part 63, Subpart WWWW)	SIC Codes	NAICS Codes
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Custom Compounding of Purchased Plastics Resins	3087	325991
Plastics Pipe and Pipe Fitting Manufacturing	3084, 3089	326122
Plastics Plumbing Fixture Manufacturing	3088	326191
All Other Plastics Product Manufacturing	3999, 3089	326199
Cut Stone and Stone Product Manufacturing	3281	327991
Motor Vehicle Body Manufacturing	3711, 3713, 3714	336211
Motor Home Manufacturing	3716	336213
Travel Trailer and Camper Manufacturing	3792, 3799	336214

#### **4(b) Information Requested**

##### **(i) Data Items**

In this ICR, all the data that is 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:

<b>Notifications</b>	
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)

<b>Reports</b>	
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)
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
Progress reports for compliance extension (if applicable)	63.10(d)(4)1
Semiannual compliance reports	63.5910(c)-(i)

A source must keep the following records:

<b>Recordkeeping</b>	
General references for recordkeeping requirements	63.5865, 63.5895, 63.5915, Tables 10, 11, 12 and 15
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	63.10(b)(2)(xii)

<b>Recordkeeping</b>	
requirements (if applicable)	
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)
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.

The proposed RTR amendments include a requirement that facilities electing to use a control device to comply with the NESHAP would be required to submit performance test results to the EPA through the EPA's CEDRI for data collected using test methods supported by the EPA's ERT. The performance test data would be required to be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. EPA anticipates that no new boat manufacturing operations will become subject to the NESHAP in



the next 3 years of the information collection. Therefore, no operations will be required to electronically submit initial performance test data via CEDRI in the next 3 years of the information collection. Sources for which construction or reconstruction commenced on or before the date that these proposed amendments were published in the Federal Register, will be required to electronically submit semiannual reports starting 2 years after the effective date of the final rule or once the reporting form for the report has been available in CEDRI for at least 1-year, whichever date is later.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
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.
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.
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.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Review reports, including performance test reports and semiannual compliance reports, required to be submitted by industry.
Input, analyze, and maintain data in Integrated Compliance Information System (ICIS) and ECHO.

### **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. 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 69 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 in Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR).

## 6. Estimating the Burden and Cost of the Collection

Tables 1-4 of Attachment 1 document 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 not conduct or 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 38,125. 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:

<b>Civilian Labor Category</b>	<b>Occupational Code</b>	<b>BLS Mean Wage Estimate, in 2016\$<sup>a</sup></b>	<b>Loaded Wage (+110%), in 2016\$</b>
Managerial	11-1021	\$64.74	\$123.27
Technical	51-8090	\$48.62	\$64.37
Clerical	43-6010	\$19.89	\$40.72

<sup>a</sup> [https://www.bls.gov/oes/current/naics4\\_326100.htm](https://www.bls.gov/oes/current/naics4_326100.htm)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, survey titled "*May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 326100 – Plastics Product Manufacturing*". The rates are from column 8, "Mean hourly wage." 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 and other costs such as photocopying and postage. In the previous ICR (Docket ID No. EPA-HQ-OECA-2013-0339), it was estimated that one facility operated add-on controls to comply with 40 CFR part 63, subpart WWWW. At the time of the RTR, all facilities are estimated to comply with the rule using compliant materials, and no facilities operate add-on controls.

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

The total capital/startup costs for this ICR are zero. The total operation and maintenance (O&M) costs for this ICR are zero. 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 zero.

### **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 activities such 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 \$107,700.

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

<b>Agency Worker Rates</b>	<b>Labor Rates, \$/hr<sup>a</sup></b>	<b>60% Overhead</b>	<b>Total, \$/hr</b>
Managerial (GS-13, step 5)	\$40.50	\$24.30	\$64.80
Technical (GS-12, step 1)	\$30.05	\$18.03	\$48.08
Clerical (GS-6, step 3)	\$16.26	\$9.76	\$26.02

<sup>a</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf)

These rates are from the Office of Personnel Management (OPM), 2017 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. Details upon which this estimate is based appear below in Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR).

### **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 the standard. It is estimated that no additional respondents per year will become subject. 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.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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
2	0	448	0	0	448
3	0	448	0	0	448
Average	0	448	0	0	448

<sup>1</sup> New respondents include sources with constructed and reconstructed.

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:

<b>Total Annual Responses</b>				
(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
<b>I. Year One</b>				
Familiarization of rule requirement	448	1	0	448
Familiarization with CEDRI and CDX registration	448	1	0	448
Re-evaluating startup, shutdown, and malfunction requirements	448	1	0	448
<b>Total: Year One</b>				<b>1,344</b>
<b>II. Years One, Two and Three</b>				
Semiannual compliance reports of all sources	448	2	0	896
Work practice requirements	448	1	0	448
Record information	448	1	0	448
<b>Total: Years One, Two and Three</b>				<b>1,792</b>

The total annual labor costs are, on average, \$3,748,600. Details regarding these estimates may be found below in Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR).

### **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 in Attachment 1, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 114,374. Details regarding these estimates may be found in Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR).

We assume that burdens for managerial tasks take 5 percent 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 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records. No annual capital/startup and O&M costs to the regulated entity are expected for this source category.

**(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 2,318 labor hours at a cost of \$107,700. See Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR).

We assume that burdens for managerial tasks take 5 percent 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 percent 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**

There is only a small increase in the labor hours per respondent in this ICR as compared to the previous ICR. This situation is due to three considerations: 1) time in year one to become familiar with the amended rules and requirements, 2) time in year one to re-evaluating previously developed SSM record systems, and 3) time in year one to become familiar with CEDRI and the electronic reporting form for the semiannual report.

Based on our search of the NEI and EPA's ECHO database ([www.echo.epa.gov](http://www.echo.epa.gov)) and a review of active air emission permits, we estimate that 448 facilities are subject to the RPC Production NESHAP. A complete list of facilities is available in the modeling data file, which is available for review in the docket for this proposed rulemaking.

**6(g) Burden Statement**

An agency may not conduct or 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), EPA 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) 566-1927. 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.



## **ATTACHMENT 1**

Tables 1 - 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review – Years 1-3

Table 4: Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review

Tables 5 - 7: Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review - Year 1-3

Table 8: Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review