

Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufa Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=CxD)
1. Applications	N/A				
2. Surveys and Studies	N/A				
3. Acquisition, installation, and utilization of technology and systems	N/A				
4. Reporting Requirements					
A. Familiarize with regulatory requirements ^a	2	1	2	82	164
B. Required activities					
Initial notification of applicability ^c	2	1	2	0	0
Notification of compliance status ^d	4	1	4	0	0
C. Create information	See 4B				
D. Gather existing information	See 4B				
E. Write report	See 4B				
Subtotal for Reporting Requirements					
5. Recordkeeping Requirements					
A. Familiarize with regulatory requirements	See 4A				
B. Plan activities	See 5E				
C. Implement activities	See 5E				
D. Record notifications and data ^e	0.1	1,095	109.5	14	1,533
E. Time to transmit or disclose information ^f	0.25	3.3	0.83	0	0
F. Time to train personnel ^g	12	1	12	0	0
G. Time for audits	N/A				
Subtotal for Recordkeeping Requirements					
Total Labor Burden and Cost (rounded) ^h					
Total Capital and O&M Cost (rounded) ^h					
GRAND TOTAL (rounded) ^h					

Assumptions:

^a There are an estimated 21 existing glass manufacturing facilities, 51 existing clay manufacturing facilities, and 10 existing se facilities that use HAP metals. We assume all 82 existing facilities will have to re-familiarize with the regulatory requirements in any of these industries.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per l hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “T. Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 11c available to those employed by private industry.

^c Five years after full implementation, existing facilities are no longer required to submit an Initial Notification.

^d Five years after full implementation, existing facilities are no longer required to submit Notifications of Compliance Status.

^e We estimate 21 glass manufacturing facilities with 27 affected furnaces. It is assumed that 13 of the 27 affected furnaces can install a control device. It is assumed that each of the remaining 14 affected furnaces have automatic monitoring and record data. It is assumed that the data from these systems is recorded 3 times per day. ($3 \times 365 = 1,095$). Existing permit requirements for glass manufacturing and secondary nonferrous metals processing facilities to collect data. Therefore, there are no costs or burden associated with these activities for clay ceramics manufacturing and secondary nonferrous metals processing.

^f Since Initial Notification and Notifications of Compliance Status are not expected for existing facilities after full implementation, no training is expected.

^g After full implementation, training is not expected to occur at existing facilities.

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

cturing, and Secondary Nonferrous

(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year ^b
8.2	16.4	\$21,482.69
0	0	\$0
0	0	\$0
189		\$21,483
76.65	153.3	\$200,810.74
0	0	\$0
0	0	\$0
1,763		\$200,811
1,950		\$222,000
		\$13,200
		\$235,000

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

< Note to EPA: updated to reflect all respondents.

14 # responses
139 hr/response

condary nonferrous metals processing
each year. No new facilities are expected

hour for Technical labor, and \$57.02 per
able 2. Civilian Workers, by
1% to account for the benefit packages

meet the emission limit without
recording systems and would be required to
instruments already require clay ceramics
associated with these information collection

tion, transmittal of these items is not

Table 2: Average Annual EPA Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and T

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year	(E) Technical Hours per Year (E=CxD)
Attend performance test ^b	16	1	16	0	0
Report review:					
Initial notification of applicability ^c	2	1	2	0	0
Notification of performance test ^d	1	1	1	0	0
Notification of compliance status ^e	4	1	4	0	0
Travel expenses for tests attended ^f				0	
TOTAL (rounded) ^g					

Assumptions:

^a This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 locality rates of pay.

^b This testing requirement is the initial testing requirement and is applicable only to glass manufacturing areas where manufacturing sources have fulfilled the initial testing requirement. There is no repeat testing requirement.

^c Five years after full implementation, existing facilities are not required to submit Initial Notifications.

^d Not required for existing facilities.

^e Five years after full implementation, existing facilities are not required to submit Notifications of Compliance.

^f Assumes Agency personnel (1 person) will spend 2 days per plant, at \$50 per diem per day, and \$400 transport to attend performance tests.

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

**, Glass Manufacturing, and
TTTTT) (Renewal)**

(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year ^a
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
		\$0
0		\$0

<- Note to EPA: Changed this (cell E4) to zero. This testing require

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

nt for government overhead
\$30.47 + 60%), and Clerical rate of
General Schedule” which excludes

ources. We assume all glass

: Status.

rtation expense per round trip to

ment applied when the rule was initially promulgated. There is no repeat testing requirement.

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 ^a (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Performance Tests	\$8,740	0	\$0	\$0	0
Monitoring Equipment	\$5,603	0	\$0	\$0	0
File Cabinets	\$235	0	\$0	\$0	0
Inspection of Emission Control Systems ^b	\$0	0	\$0	\$943	14
Total ^c			\$0		

^a No new sources are expected and all existing sources have fully implemented capital costs to comply with the cur

^b We estimate 21 glass manufacturing facilities with 27 affected furnaces. We assume that 13 of the 27 furnaces car

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)					
1	0	51	0	0	51
2	0	51	0	0	51
3	0	51	0	0	51
Average	0	51	0	0	51
Glass Manufacturing Area Sources (Subpart SSSSSS)					
1	0	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)					
1	0	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10
Average Total	0	82	0	0	82

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

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 E=(BxC)+D
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)				
Keeps Records	0	0	N/A ^a	0
Total				0
Glass Manufacturing Area Sources (Subpart SSSSS)				
Keeps Records	0	0	14 ^b	14
Total				14
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)				
Keeps Records	0	0	N/A ^a	0
Total				0
		Total Responses for All Area Sources		14

^a No responses are required for this activity after the first three years

^b We estimate 21 glass manufacturing facilities with 27 affected furnaces. Of these, 14 furnaces have automatic mo

(G)
Total O&M (E X F)
\$0
\$0
\$0
\$13,202
\$13,200

rent standards. Therefore, no additional capital/start-up costs are expected.

1 meet the emission limit without installation of a control device. We assume that each of the remaining 14 affected fur

monitoring and recording systems.

naces have automated monitoring and recording systems. We assume that annual inspections of emission control s

systems will require 8 hours per inspection at the current labor rate for technical personnel (\$117.92/hr) for each of

the 14 affected furnaces with a control device ($\$117.92 \times 8 = \943 (rounded)).