

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal), EPA ICR Number 1799.10, OMB Control Number 2060-0362.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Mineral Wool Production were proposed on May 8, 1997, promulgated on June 1, 1999, and amended on July 29, 2015. These regulations apply to both new and existing mineral wool production facilities with cupolas and/or curing ovens. These standards apply to owners or operators located at a plant site that is a major source of hazardous air pollutant (HAP) emissions. This signifies that the plant has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAPs at a rate of 22.68 megagrams (25 tons) or more per year. 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 DDD.

In general, all NESHAP standards require initial notification reports, 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 this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners or operators of the mineral wool production industry. The “burden” to the Affected Public may be found below at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal). There are approximately eight mineral wool production facilities, which are owned and operated by the mineral wool production industry. None of the eight facilities in the United States are owned by either state,

local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 1.5 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately eight respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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 hazardous air pollutants. These standards are applicable to either 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, HAP emissions from mineral wool production 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 DDD.

## **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 capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards are used to inform the Agency or its 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 DDD.

### **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* for this renewal.

### **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 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 eight 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 they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the North American Insulation Manufacturing Association, at (703) 684-0084, and the Rock Wool Manufacturing Company Incorporated, at (800) 874-7625.

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 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 (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 mineral wool manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 3296, which corresponds to the North American Industry Classification System (NAICS) 327993 for Mineral Wool Manufacturing.

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

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

In this ICR, all the data that are recorded or reported is required by the NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD).

A source must make the following reports:

<b>Notifications</b>	
Applicability	§§63.9(a), 63.1191(a)
Construction/reconstruction	§§63.9(b)(3-4), 63.1191(b)
Actual startup	§§63.9(b) (2) and (4)
Special compliance requirements	§§63.9(d), 63.1191(c)
Initial performance test	§§63.9(e), 63.1191(d)
Compliance status	§§63.9(h), 63.1191(e)

<b>Notifications</b>	
Request for extension of compliance, adjustments to time periods, and changes in information	§§63.9(c), (i-j)

<b>Reports</b>	
Report of performance test results	§§63.10(d)(2), 63.1193(a)
Operations, maintenance, and monitoring plan	§§63.6(e)(1-2), 63.1193(d)
Semiannual excess emissions report	§§63.10(e)(3), 63.1193(e)
Semiannual no excess emissions report	§§63.10(e)(3), 63.1193(f)

A source must keep the following records:

<b>Recordkeeping</b>	
General recordkeeping, including process equipment, air pollution control equipment, all required maintenance performed, CMS malfunctions, and actions taken outside the scope of existing plans	§§63.10(b), 63.1192(a)
Maintain records of the following information: - Cupola production (melt) rate [Mg/hr) or (tons/hr)] - All bag leak detection system alarms - Free-formaldehyde content of each resin lost and binder formulation - Incinerator operating temperature and results of incinerator inspections	§63.1192(b)
Retain records for five years	§63.1192(c)
Retain records on microfilm, on computer, on disks, magnetic tape disks, or on microfiche	§63.1192(d)
Report information on paper or on a labeled computer disk using available computer software	§63.1192(e)

#### 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. Additionally, since 2015, for data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (<http://www.epa.gov/ttn/chief/ert/index.html>), respondents must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) ([http://cdx.epa.gov/epa\\_home.asp](http://cdx.epa.gov/epa_home.asp)).

### (ii) Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate a bag leak detection system for each fabric filter, or CMS for temperature for a thermal incinerator.
Perform initial performance test, Reference Method 1, 2, 3, or 3A, 4, 5, 10, 26A, and 318 or 320 tests, method to determine the free-formaldehyde content, 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:

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
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 standards and to notate 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**

The Small Business Administration defines a small entity engaging in mineral wool production operations as a firm having no more than 500 employees. Based on information collected in the 2015 amendments, there are six companies operating the eight mineral wool production facilities and five of the six companies are small businesses.

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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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 2,130 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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 the regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Baghouse Leak Detection	\$22,350	0	\$0	\$750	8	\$6,000
Total			\$0			\$6,000

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

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 \$6,000. 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 \$6,000. These are the recordkeeping costs.

### 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 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 \$8,400.

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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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 eight 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 eight 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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

<sup>1</sup> 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 eight.

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>Total Annual Responses</b>				
Notification of applicability	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Excess emissions report	1.6	2	0	3.2
Report of no excess emissions	6.4	2	0	12.8
Quality improvement plan	0	1	0	0
			Total	16

The number of Total Annual Responses is 16.

The total annual labor costs are \$302,000.00 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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 at the end of this document, respectively, and summarized below.

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

The total annual labor hours are 2,130 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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 for this collection of information is estimated to average 133 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$6,000. These 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 177 labor hours at a cost of \$8,400; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (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.

### **6(f) Reasons for Change in Burden**

There is no change in the ‘burden’ in this ICR compared to the previous ICR. This is due to three considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden; however, there is an adjustment increase in the labor costs in this ICR compared to the previous ICR. This adjustment is due to a labor rate change in the calculation of labor costs. There are no changes to the capital and operation and maintenance costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 133 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-2012-0678. 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-2012-0678 and OMB Control Number 2060-0362 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 Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal)**

Burden Items	(A) Person hours per occurrence	(B) Occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person hours per year (Cx D)	(F) Managerial person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements <sup>c</sup>	4	1	4	8	32	1.6	3.2	\$4,191.74
B. Required Activities								
Initial performance test <sup>d</sup>	421	1	421	0	0	0	0	\$0
Repeat performance test <sup>d,e</sup>	421	0.2	84.2	0	0	0	0	\$0
Operations, maintenance, and monitoring plan <sup>f</sup>	40	1	40	0	0	0	0	\$0
COS Testing <sup>n</sup>				8				\$34,400
HCl/HF Testing <sup>n</sup>				8				\$10,400
Phenol and methanol testing <sup>n</sup>				8				\$14,400
C. Create Information	See 3B							
D. Gather Existing Information	See 3B							
E. Write Reports								
Notification of applicability <sup>g</sup>	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction <sup>g</sup>	2	1	2	0	0	0	0	\$0
Notification of actual startup <sup>g</sup>	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements <sup>g</sup>	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0

<sup>g</sup>								
Notification of compliance status <sup>g</sup>	2	1	2	0	0	0	0	\$0
Request for extension of compliance adjustment to time periods, and changes in information <sup>g</sup>	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Excess emissions report <sup>h</sup>	16	2	32	1.6	51.2	2.56	5.12	\$6,706.79
Report of no excess emission <sup>i</sup>	8	2	16	6.4	102.4	5.12	10.24	\$13,413.58
Quality improvement plan <sup>j</sup>	40	1	40	0	0	0	0	\$0
<b>Subtotal for Reporting</b>						<b>213</b>		<b>\$83,512.12</b>
4. Recordkeeping Requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan Activities	See 3E							
C. Implement Activities	See 3E							
D. Develop Record System	See 3E							
E. Time to Enter Information								
Records of operating parameters and emissions <sup>k</sup>	4	52	208	8	1664	83.2	166.4	\$217,970.69
F. Time to transmit or disclose information <sup>l</sup>	0.25	2	0.5	8	4	0.2	0.4	\$523.97
G. Time to Train Personnel	N/A							
H. Time for Audits	N/A							
<b>Subtotal for Recordkeeping</b>						<b>1,918</b>		<b>\$218,494.66</b>
<b>Total Labor Burden and Cost (rounded) <sup>m</sup></b>						<b>2,130</b>		<b>\$302,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>								<b>\$6,000</b>
<b>TOTAL COST: <sup>m</sup></b>								<b>\$308,000</b>

## Assumptions:

a We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no additional new sources over the three-year period of this ICR.



- b This ICR uses the following labor rates: \$147.40 for Managerial, \$117.92 for Technical, and \$57.02 for Clerical. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupational and Industry Group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c We have assumed that it will take each respondent 4 hours to familiarize with the regulatory requirements.
- d We have assumed that it will take 421 hours for each new respondent to complete an initial performance test based on the following: (1.7 sources per plant x 130 hours per source +200 hours for calibration, retesting, sample analysis, etc) for a total of 421 hours.
- e We have assumed that 20% of respondents will have to repeat performance test due to failure.
- f We have assumed that each of the respondents will take 40 hours to prepare the operation, maintenance, and monitoring plan.
- g We have assumed that each of the respondents will take 2 hours to write reports.
- h We have assumed that 20% of respondents will each take 16 hours two times per year to write excess emission reports.
- i We have assumed that 80% of respondents will take 8 hours two times per year to complete the report for no excess emissions.
- j We have assumed that 10% of facilities are required to prepare a quality improvement plan each year.
- k We have assumed that each respondent will take 4 hours 52 times per year to enter information.
- l We have assumed that it will take each respondent 15 minutes (0.25 hours) two times per year to transmit or disclose information.
- m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- n Performance tests must be completed once every five years. We estimate the annualized compliance testing costs are \$59,200 for all 8 facilities (\$34,400 for COS test, \$10,400 for HCl/HF test, and \$14,400 for phenol/methanol test). See EPA-HQ-OAR-2010-1041-0171.pdf

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Mineral Wool Production (40 CFR Part 63, Subpart DDD) (Renewal)**

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (Cx D)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ <sup>b</sup>
Initial performance tests								
New or modified facility	40	1	40	0	0	0	0	\$0
Repeat performance tests <sup>c</sup>								
A. Familiarization with the regulatory requirements	40	0.2	8	0	0	0	0	\$0
Report review								
Notification of applicability	2	1		0				
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	1	1	1	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustment to time periods, and changes in information	2	1	2	0	0	0	0	\$0
Quality improvement plan <sup>d</sup>	40	1	40	0	0	0	0	\$0
Operations, maintenance, and monitoring plan	40	1	40	0	0	0	0	\$0
Report of performance test	40	1	40	0	0	0	0	\$0
Excess emissions report <sup>e</sup>	20	2	40	1.6	64	3.2	6.4	\$3,499.10
Report of no excess emissions <sup>f</sup>	2	2	4	6.4	25.6	1.28	2.56	\$1,399.64
Review compliance test reports for COS for cupolas and formaldehyde, phenol, and methanol for collection/curing operations <sup>g</sup>	8	1	8	8	64	3.2	6.4	\$3,499.10
<b>Total Labor Burden and Cost (rounded) <sup>h</sup></b>						<b>177</b>		<b>\$8,400</b>

Assumptions:

- <sup>a</sup> We have assumed that the average number of respondents potentially subject to this rule is 8. There will be no additional new sources over the three-year period of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$65.75 for Managerial, \$48.75 for Technical, and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.
- <sup>c</sup> We have assumed that 20% of respondents will fail the performance test.
- <sup>d</sup> We have assumed that it will take 40 hours to review the quality improvement plan report.
- <sup>e</sup> We have assumed that 20% of respondents will submit the excess emissions report and it will take 20 hours to review.
- <sup>f</sup> We have assumed that 80% of respondents will submit the report of no excess emissions and it will take 2 hours to review.
- <sup>g</sup> Assumes Agency will review all of the annual reports - including the new COS, phenol, and methanol emissions testing.
- <sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.