

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS/NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP and 40 CFR Part 63, Subpart NNN) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS/NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP and 40 CFR Part 63, Subpart NNN) (Renewal), EPA ICR Number 1160.14, OMB Control Number 2060-0114.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) were proposed on February 7, 1984, and promulgated on February 25, 1985. These regulations apply to existing facilities and new facilities with rotary spin (RS) wool fiberglass insulation manufacturing lines. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart PPP.

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) were proposed on March 31, 1997, promulgated on June 14, 1999, and amended on: April 20, 2006; July 29, 2015; and December 26, 2017 (82 FR 60873). The 2017 amendments include the following changes as part of the Agency's residual risk and technology review (RTR): (1) for forming, cooling, and collection processes on bonded rotary spin (RS) lines, readopting emission limits for formaldehyde that were established in the 1999 rule, establishing new emission limits for methanol, and adding a work practice standard for phenol emissions; (2) for flame attenuation (FA) lines, revising the emission standards promulgated on July 29, 2015 by creating three subcategories of FA lines and establishing emission limits for formaldehyde and methanol emissions, and either emission limits or work practice standards for phenol emissions for each subcategory of FA line. The 2017 amendments did not impose any new information collection burden. These regulations apply to each new and existing glass melting furnace located at a wool fiberglass manufacturing facility; each new and existing bonded RS manufacturing line producing building insulation; and each new and existing flame attenuation (FA) manufacturing line that produces a bonded product. Plants that manufacture mineral wool from rock or slag are not subject to the rule, but they are subject to 40 CFR Subpart DDD, the National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production. A facility that is determined to be an area source would not be subject to this NESHAP standard, but they are subject to a separate NESHAP (40 CFR Part 63, Subpart NN). New facilities include those that commenced either construction or reconstruction after November 25, 2011. This information is being collected to assure compliance with 40 CFR Part 60, Subpart PPP and 40 CFR Part 63, Subpart NNN.

In general, all NSPS and NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS and NESHAP.

Any owner/operator subject to the provisions of 40 CFR Part 60, Subpart PPP shall maintain a file containing these documents, and retain the file for at least two years following the generation date of such maintenance reports and records. Any owner/operator subject to the provisions of 40 CFR Part 63, Subpart NNN 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's (EPA) regional offices.

The "Affected Public" are owners and operators of wool fiberglass manufacturing plants. There are approximately 42 wool fiberglass insulation manufacturing facilities, which are owned and operated by private industry. None of the facilities in the United States are owned by either state, local, tribal or Federal governments. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond. The "burden" to the "Affected Public" may be found below in Table 1a: Annual Respondent Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and below in Table 1b: Annual Respondent Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2a: Average Annual EPA Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and below in Table 2b: Average Annual EPA Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (Renewal).

Over the next three years, approximately 42 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

There are approximately 42 wool fiberglass insulation manufacturing facilities, which are owned and operated by the wool fiberglass insulation manufacturing industry. There are approximately 32 sources currently subject to 40 CFR Part 60, Subpart PPP, and 10 sources subject to 40 CFR Part 63, Subpart NNN¹. The 10 sources for Subpart NNN are based on EPA research during the 2015 amendment. EPA found there are a total of 30 facilities producing wool fiberglass and that approximately 10 of facilities are major sources of HAP emissions, and therefore covered by Subpart NNN. None of the 42 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by

¹ The number of sources in this ICR has decreased from the previous ICR due to the industry phasing out the use of phenol /formaldehyde (p/f) resin. Based on consultation with the Agency's internal experts there are approximately 10 facilities (respondents) that are subject to Subpart NNN.

privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

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

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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 requirements 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 wool fiberglass insulation manufacturing facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS and NESHAP were promulgated for this source category at 40 CFR Part 60, Subpart PPP, and 40 CFR Part 63, Subpart NNN, respectively.

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

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these same 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 60, Subpart PPP and 40 CFR Part 63, Subpart NNN.

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 42 respondents will be subject to these 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 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 Manufacturers Association, at (703) 684-0084, and the Central States Insulation Association, at (888) 294-0084.

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 these same standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of

enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these 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 wool fiberglass manufacturing plants. 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 NSPS/NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP, and 40 CFR Part 63, Subpart NNN).

A source must make the following reports:

Notifications/Reports	
40 CFR Part 60, Subpart PPP	
Notification of construction/reconstruction	§60.7(a)(1)
Notification of actual startup	§60.7(a)(3)
Notification of initial performance test	§60.8(d)
Notification of physical or operational change	§60.7(a)(4)

Notifications/Reports	
Initial performance test results	§60.8(a)
Semiannual reports of exceedances of control device operating parameters	§60.684(d)
40 CFR Part 63, Subpart NNN	
Notification of applicability	§63.9(a), §63.1386(a)(1-3)
Notification of construction/reconstruction	§63.9(b)(4), §63.1386(a)(4)
Notification of actual startup	§63.9(b)(2),(4)(v)
Notification of special compliance requirements	§63.9(d), §63.1386(a)(5)
Notification of performance test	§63.9(e), §63.1386(a)(6)
Continuous monitoring system notifications	§63.9(g)
Notification of compliance status	§63.9(h), §63.1386(a)(7)
Request for extension of compliance, adjustments to time periods, and changes in information	§63.9(c),(i),(j)
Operations, maintenance, and monitoring plan	§63.6(e)(1), §63.1383(a)
Report of performance test results	§63.10(d)(2), §63.1386(f)
Excess emissions	§63.1386(e)

A source must keep the following records:

Recordkeeping	
40 CFR Part 60, Subpart PPP	
Startups, shutdowns, malfunctions, and periods where the continuous monitoring system is inoperative	§60.7(b)
Records are required to be retained for two years	§60.7(f)
Continuous measurements of control device operating parameters	§60.684(a)-(d)
40 CFR Part 63, Subpart NNN	
General recordkeeping requirements (e.g., malfunctions, failure to meet a standard, air pollution control equipment, maintenance	§63.10(b)(2),

Recordkeeping	
performed, and actions taken outside the scope of the existing plans)	§63.1386(c)-(d)
Continuous measurements of control device operating parameters: <ul style="list-style-type: none"> - Bag leak detection system alarms - ESP parameter values used to measure performance - Air temperature above the molten glass in a cold top furnace - Uncontrolled glass-melting furnace parameter values to measure performance - The formulation of each binder patch and the LOI and density for each product manufactured - Process parameter levels for RS and FA manufacturing lines that use process modifications to comply with the emission limits - Scrubber pressure drop, scrubbing liquid flow rate, and any chemical additive - Incinerator operating temperature and the results from periodic inspection of incinerator components - Glass pull rate - Cullet sampling and inspections - Daily average cullet percentage and 30-day rolling average percent cullet 	§63.1386(d)(2)(i-ix)

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. Respondents must also submit the results of the performance tests supported by the EPA's Electronic Reporting Tool (ERT) to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) as accessed through the EPA's Central Data Exchange (CDX) (http://cdx.epa.gov/epa_home.asp).

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or CMS for temperature for incinerators, or for pressure drop and liquid supply pressure or liquid flow rate for wet scrubber for 40 CFR Part 63, Subpart NNN sources. Install, calibrate, maintain, and operate

Respondent Activities
CMS for opacity, for pressure drop and liquid supply pressure for wet scrubber, or for current (amperes), voltage, and flow rate for wet electrostatic precipitators for 40 CFR Part 60, Subpart PPP sources.
Perform initial performance test, Reference Method 1-5, 29, 308, 316 or 318; method for determining LOI; method for determining free-formaldehyde content, method for determining free-phenol content; method for determining methanol content; method for determining concentrations of chromium compounds, and method for the determination of product density, and repeat performance tests if necessary for 40 CFR Part 63, Subpart NNN sources. Perform initial performance test, Reference Method 5E test, method of determining LOI, and repeat performance tests if necessary for 40 CFR Part 60, Subpart PPP sources.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

Agency Activities

Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by 40 CFR Part 60, Subpart PPP must be retained by the owner/operator for two years. The records required by 40 CFR Part 63, Subpart NNN must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by these regulations. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below, at the end of this document, in both Table 1a: Annual Respondent Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NESHAP for Wool

Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the subparts 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 record-keeping and reporting requirements is estimated to be 8,450 hours (Total Labor Hours from both Tables 1a & 1b below). This estimate includes 2,670 hours for 40 CFR Part 60, Subpart PPP, and 5,780 hours for 40 CFR Part 63, Subpart NNN, respectively. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS and 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 regulation. 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(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 ¹	(G) Total O&M, (E X F) ²
NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP)						
Particulate Matter Monitoring	\$15,000	0	\$0	\$16,500	32	\$528,000
NESHAP for Wool Fiberglass Manufacturing Plants (40 CFR Part 63, Subpart NNN)						
Baghouse Leak Detection	\$9,100	0	\$0	\$500	7	\$3,500
Furnace Temperature Monitoring	\$1,500	0	\$0	\$0	5	\$0
Formaldehyde Emission Monitoring	\$15,000	0	\$0	\$0	17	\$0
Chromium Compound Testing ³	\$0	0	\$0	\$10,000	8	\$80,000
Phenol, Methanol and Formaldehyde Testing ⁴	\$0	0	\$0	\$800	13	\$10,400
		Total²	\$0		Total²	\$622,000

¹ In order to calculate O&M costs for 40 CFR Part 63, Subpart NNN, the estimates provided in column F were not based on the number of respondents but, instead, based on the total number of continuous monitoring devices that exist within the industry; some respondents may have more than one continuous monitoring device located at their facility. We assumed the number of continuous monitoring devices decreased proportionally with the number of sources.

² Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

³ The 2015 Residual Risk and Technology Review (RTR) assumed 8 gas-fired furnaces at 5 facilities. Chromium compound testing is required annually with an estimated cost of \$10,000 per test.

⁴ The 2015 RTR assumed 13 flame attenuation lines at 2 facilities. Phenol, methanol, and formaldehyde testing is required once every 5 years with an estimated cost of \$4,000 per test. (\$4,000 per test x (1 test / 5 years) = \$800/yr).

The total capital/startup costs for this ICR are \$622,000. This is the total of column D in the above table.

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 \$622,000. This estimate includes \$528,000 for 40 CFR Part 60, Subpart PPP, and \$93,900 for 40 CFR Part 63, Subpart NNN. These are the O&M 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 \$13,000 (rounded). This estimate includes \$7,000 for 40 CFR Part 60, Subpart PPP, and \$5,980 for 40 CFR Part 63, Subpart NNN.

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 both Table 2a: Average Annual EPA Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and Table 2b: Average Annual EPA Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (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 42 existing respondents will be subject to these standards. Approximately 32 sources are currently subject to 40 CFR Part 60, Subpart PPP, and 10 sources are subject to 40 CFR Part 63, Subpart NNN. 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 42 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)

Number of Respondents					
Year	Number of New Respondents ¹	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)
1	0	42	0	0	42
2	0	42	0	0	42
3	0	42	0	0	42
Average	0	42	0	0	42

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 42.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
40 CFR Part 60, Subpart PPP				
Semiannual Exceedance Report	32	2	0	64
40 CFR Part 63, Subpart NNN				
Excess Emissions Report	10	2	0	20
			Total	84

The number of Total Annual Responses is 84.

The total annual labor costs are \$962,000 (rounded). This includes \$304,000 for 40 CFR Part 60, Subpart PPP, and \$658,000 for 40 CFR Part 63, Subpart NNN. Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and in Table 1b: Annual Respondent Burden and Cost – NESHAP for Wool Fiberglass insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (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 8,450 hours. This includes 2,670 hours for 40 CFR Part 60, Subpart PPP, and 5,780 hours for 40 CFR Part 63, Subpart NNN. Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost – Annual Respondent Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and Table 1b: Annual Respondent Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (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 42 hours per response for 40 CFR Part 60, Subpart PPP, and 289 hours per response for 40 CFR Part 63, Subpart NNN.

The total annual capital/startup and O&M costs to the regulated entity are \$622,000. This includes \$528,000 for 40 CFR Part 60, Subpart PPP and \$93,900 for 40 CFR Part 63, Subpart NNN. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 276 labor hours at a cost of \$13,000 (rounded). The average annual Agency burden and cost is estimated to be 147 labor hours at a cost of \$7,000 for 40 CFR Part 60, Subpart PPP, and 129 labor hours at a cost of \$5,980 for 40 CFR Part 63, subpart NNN; see below for both Table 2a: Average Annual EPA Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal), and Table 2b: Average Annual EPA Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (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 an adjustment decrease in the total estimated burden for Subpart NNN as

currently identified in the OMB Inventory of Approved Burdens; this decrease is not due to any program changes. The decrease in the burden is due to the removal of burden from startup, shutdown, and malfunction reporting requirements that were removed in the July 2015 rule. Therefore, there were decreases in the respondent labor hours and number of responses. Labor rates were updated for Subpart NNN. There is no change in the total estimated burden for Subpart PPP as currently identified in the OMB Inventory of Approved Burdens.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 42 hours per response for 40 CFR Part 60, Subpart PPP, and 289 hours per response for 40 CFR Part 63, Subpart NNN. ‘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-2012-0658. 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-2012-0658 and OMB Control Number 2060-0114 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 1a: Annual Respondent Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal)

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondent s per Year ^a	(E) Technica l Hours per Year (E=CxD)	(F) Manageria l Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	1	1	1	32	32	1.6	3.2	\$4,191.74
B. Required activities								
Initial performance tests ^d	72	1	72	0	0	0	0	\$0
Repeat performance tests ^e	72	0.2	14.4	0	0	0	0	\$0
C. Create information								
D. Gather existing information								
E. Write Report								
Notification of construction/reconstruction ^f	2	1	2	0	0	0	0	\$0
Notification of actual startup ^f	2	1	2	0	0	0	0	\$0
Notification of physical or operational change ^f	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^f	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Semiannual exceedance report ^g	4	2	8	32	256	12.8	25.6	\$33,533.95
Subtotal for Reporting Requirements					331			\$37,726
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements ^c	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							

D. Develop record system	N/A							
E. Time to enter information								
40 CFR Part 60, Subpart PPP								
^{h, i} Records of operating parameters and emissions	0.25	250	62.5	32	2,000	100	200	\$261,984
Records of startups, shutdowns, and malfunctions ^j	1	1	1	32	32	1.6	3.2	\$4,191.74
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						2,337		\$266,176
TOTAL LABOR BURDEN AND COST (rounded)^k						2,670		\$304,000
TOTAL CAPITAL AND O&M COSTS (rounded)^k								\$528,000
GRAND TOTAL (rounded)^k								\$832,000

Assumptions:

^a We have assumed that there are approximately 32 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: Managerial \$147.40 (\$70.19 + 110%), Technical \$117.92 (\$56.15 + 110%), and 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. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.

^c We have assumed that all existing respondents will each take one hour to re-familiarize with the regulatory requirements each year.

^d We assume that it will take each respondent 72 hours to complete initial performance tests.

^e We assume that 20 percent of respondents will have to repeat the initial performance tests due to failures.

^f We assume that each respondent will take two hours to prepare notification reports.

^g We assume that each respondent will take four hours to prepare semiannual report.

^h We assume that 0.25 hours is required to record operating parameters.

ⁱ We assume that each respondent will enter operating parameters and emissions records 250 days per year.

^j We assume that it will take one hour per year for each respondent to record startups, shutdowns, malfunctions, etc.

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

Table 1b: Annual Respondent Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (Renewal)

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondent s per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	8	1	8	10	80	4	8	\$10,479.36
B. Required activities								
Initial performance tests ^d	980	1	980	0	0	0	0	\$0
Repeat initial performance tests ^e	980	0.2	196	0	0	0	0	\$0
Operations, maintenance, and monitoring plan ^f	40	1	40	0	0	0	0	\$0
C. Create information	8	1	8	10	80	4	8	\$10,479.36
D. Gather existing information								
E. Write Report								
Notification of applicability ^g	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^g	2	1	2	0	0	0	0	\$0
Notification of actual startup ^g	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements ^g	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^g	2	1	2	0	0	0	0	\$0
Notification of compliance status ^g	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustments to time periods, and changes in information ^{g,h}	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							

Excess emissions report ^{h, n}	16	2	32	2	64.0	3.2	6.4	\$8,383.49
Report of no excess emissions ^{n, 1}	1	2	2	8	16	0.8	1.6	\$2,095.87
Quality improvement plan ¹	40	1	40	0	0	0	0	\$0
Subtotal for Reporting Requirements						276		\$31,438
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements ^c	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of operating parameters and emissions ⁿ	9	52	468	10	4,680	234	468	\$613,042.56
F. Train Personnel	N/A							
G. Audits	N/A							
H. Time to transmit or disclose information	8	1	8	13	104	5	10.4	\$13,623.17
Subtotal for Recordkeeping Requirements						5,502		\$626,666
TOTAL LABOR BURDEN AND COST (rounded) ^o						5,780		\$658,000
TOTAL CAPITAL AND O&M COSTS (rounded) ^o								\$93,900
GRAND TOTAL (rounded) ^o								\$752,000

Assumptions:

^a We have assumed that there are approximately 10 respondents, with 2 reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: Managerial \$147.40 (\$70.19 + 110%), Technical \$117.92 (\$56.02 + 110%), and 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. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.

^c We have assumed that all existing respondents will each take one hour to re-familiarize with the regulatory requirements each year.

^d We assume that it will take each respondent 980 hours to complete initial performance tests.

^e We assume that 20 percent of respondents will have to repeat the initial performance tests due to failures.

- ^f We assume that each respondent will take 40 hours to prepare the operations, maintenance, and monitoring plan.
- ^g We assume that it will take each respondent two hours to prepare each of the notifications.
- ^h We assume that it will take each respondent one hour to write the extension of compliance; adjustments to time periods, and changes in information reports.
- ⁱ We assume that it will take each respondent 16 hours to prepare excess emissions reports.
- ^j We assume that 20 percent of respondents are required to prepare excess emissions reports.
- ^k We assume that each respondent will take one hour to prepare no excess emissions reports.
- ^l We assume that 80 percent of respondents will submit the no excess emissions reports.
- ^m We assume that 40 percent of respondents are required to prepare the quality improvement plan.
- ⁿ We assume that it will take each respondent nine hours each week to record records of operating parameters and emissions.
- ^o Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2a: Average Annual EPA Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=E×0.05)	(G) Clerical Hours per Year (G=E×0.1)	(H) Cost, \$ ^b
1. Initial performance tests								
A. New or modified plant ^c	24	1	24	0	0	0	0	\$0
2. Repeat performance tests			0					
A. New or modified plant ^{c, d}	24	0.2	4.8	0	0	0	0	\$0
3. Report Review								
A. New or modified plant								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	1	1	1	0	0	0	0	\$0
Notification of physical or operational change	2	1	2	0	0	0	0	\$0
Notification of initial performance test	1	1.2	1.2	0	0	0	0	\$0
Review performance test results ^e	8	1.2	9.6	0	0	0	0	\$0
Review semiannual exceedance/no exceedance reports ^f	2	2	4	32	128	6.4	12.8	\$6,998.21
TOTAL COST (rounded)^g						147		\$7,000

Assumptions:

^a We have assumed that there are approximately 32 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: Managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical \$48.75 (GS-12, Step 1, \$30.47 + 60%), and 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 government employees. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.

- ^c We have assumed that it will take 24 hours for each new plant to participate in the performance testing.
- ^d We assume that 20 percent of new or modified plants will have to repeat performance test due to failures.
- ^e We assume that each new or modified plant will take eight hour 1.2 times per year to review the performance test results reports.
- ^f We have assumed that each plant will take two hours two times per year to review the semiannual exceedance/no exceedance reports
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2b: Average Annual EPA Burden and Cost – NESHAP for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 63, Subpart NNN) (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=E×0.05)	(G) Clerical Hours per Year (G=E×0.1)	(H) Cost, \$ ^b
1. Initial performance tests								
A. New or modified plant ^c	40	1	40	0	0	0	0	\$0
2. Repeat performance tests								
A. New or modified plant ^{c, d}	40	0.2	8	0	0	0	0	\$0
3. Report Review								
A. New or modified plant								
Notification of applicability ^e	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^e	2	1	2	0	0	0	0	\$0
Notification of actual startup ^e	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements ^e	1	1	1	0	0	0	0	\$0
Notification of initial performance test ^e	2	1	2	0	0	0	0	\$0
Notification of compliance status ^e	2	1	2	0	0	0	0	\$0
Request for extension of compliance, adjustments to time periods, and changes in information ^f	2	1	2	0	0	0	0	\$0
Report of initial performance test	40	1	40	0	0	0	0	\$0
Excess emissions report ^g	20	2	40	2	80	4.0	8	\$4,272.32
Report of no excess emissions ^h	2	2	4	8	32	1.6	3.2	\$1,708.93
Quality improvement plan ⁱ	40	1	40	0	0	0	0	\$0
Operations, maintenance, and monitoring	40	1	40	0	0	0	0	\$0

plan ⁱ								
TOTAL COST (rounded) ^j						129		\$5,980

Assumptions:

- a We have assumed that there are approximately 10 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.
- b This ICR uses the following labor rates: Managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%) , Technical \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM), 2016 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. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.
- c We have assumed that it will take 40 hours for each new plant to participate in the performance testing.
- d We assume that 20 percent of new or modified plants will have to repeat performance test due to failures.
- e We assume that each new or modified plant will take two hour once per year to review the notification reports.
- f We assume that each new or modified plant will take two hours once per year to completed request.
- g We assume that 20 percent of plants will submit excess emissions reports twice per year.
- h We assume that 80 percent of plants will submit the no excess emissions report twice per year.
- i We assume that it will take 40 hours once per year to review plans.
- j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.