SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal), EPA ICR Number 1158.13, OMB Control Number 2060-0156.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) were proposed on January 20, 1983; promulgated on September 15, 1987; and amended September 19, 1989 and October 17, 2000. These regulations apply to existing and new facilities with the following processes: undertread cementing operations, sidewall cementing operations, tread end cementing operations, bead cementing operations, green tire spraying operations, Michelin-A operations, Michelin-B operations, and Michelin-C automatic operations. Affected facilities include those that commenced construction, modification, or reconstruction after January 20, 1983. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BBB.

In general, all NSPS 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.

Any owner/operator subject to the provisions of this part 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. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners or operators of the rubber tire manufacturing industry. The “burden” to the “Affected Public” may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal). There are approximately 41 rubber tire manufacturing facilities. None of the facilities in the United States are owned by 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.

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.

Over the next three years, approximately 41 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. While some rubber tire manufacturing plants may conduct operational changes, these changes will not trigger applicability of this rule. We also assume that all plants are now using water-based sprays that meet the NSPS green tire spray limits without having to use add-on control equipment.

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)(l).

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.

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, volatile organic compound (VOC) emissions from rubber tire manufacturing plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart BBB.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the 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 the 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 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 the standards are being met. The performance test may also be observed.

The required semiannual and annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 40 CFR Part 60, Subpart BBB.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the

Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (FR citation, e.g., 84 FR 19777) on May 6, 2019. 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 the standard, 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 41 respondents will be subject to the standard 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 the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Rubber Manufacturers Association at (202) 682-4800 and Bridgestone Americas, Inc. at (800) 543-7522.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. 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 the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

3(f) Confidentiality

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

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are rubber tire manufacturing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3011, which corresponds to the North American Industry Classification System (NAICS) 32621 for Tire Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB).

A source must make the following reports:

Notifications	
Notification to construct/reconstruct	§60.7(a)(1)
Notification of actual startup	§60.7(a)(3)
Initial performance test results	§60.8(a)
Initial compliance report that includes initial performance test, monthly schedule to be used in making compliance determinations, design and equipment specifications and compliance method	§§60.8(a), 60.8(d), 60.546(a-e)
Demonstration of continuous monitoring system	§60.7(a)(5)
Notification of physical or operational change	§60.7(a)(4)

Notifications	
Periodic startup, shutdown, malfunction reports, and periods where the continuous monitoring system is inoperative	§60.7(b)
Seeking to comply with an alternative method, from use of applicable percent emission reduction requirement to applicable total (uncontrolled) monthly VOC use limit	§60.546(h)
Initial and annual formulation data or Method 24 results to verify VOC content of water-based sprays	§60.546(j)

Reports	
Excess emissions report	§§60.546(f-g)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions, and periods where the continuous monitoring system is inoperative	§60.7(b)
Maintain a file of all measurements including performance tests, and all other information required by this part and recorded in a permanent file suitable for inspection. The file shall be retained for at least two years.	§60.7(f)
Maintain records of operating parameters of monitoring device results for catalytic or thermal incinerator, or carbon absorber	§§60.545(a-c)
Maintain records of monthly VOC use, number of days in compliance period, and other information needed to verify results of all monthly tests	§§60.545(d-e)
Maintain records of formulation data or results of Method 24 analysis of water-based sprays containing less than 1.0 percent of VOC	§60.545(f)

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate a temperature monitoring device with a continuous recorder, an organics monitoring device with a continuous recorder to detect the concentration level of organic compounds, or a recovery device, as applicable.
Perform initial performance test, Reference Method 24 test or formulation data analysis for the determination of the VOC content of cements or green tire spray materials; Method 25A for the determination of the VOC concentration if using a control device; Method 2 for the determination of the flow rate at the stack gas; monthly performance test or formulation data analysis of the spray material, and repeat performance test 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.

Agency Activities
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 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 and annual 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 two years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 17,700 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	$141.06 ($67.17+ 110%)
Technical	$120.27 ($57.27 + 110%)
Clerical	$58.67 ($27.94 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “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	(G) Total O&M, (E X F)
VOC (organics) monitor [1]	$35,000	0	$0	$7,500	0	$0
Temperature monitors at thermal and catalytic incinerators [1]	$7,500	0	$0	$4,000	4.1	$16,400
Total [2]			$0			$16,400

[1] We assume no facilities are using an organics monitor or carbon absorber at this time. An estimated 10 percent of respondents use a temperature monitor.

[2] 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 $16,400. 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 $16,400. These are 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 activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $20,100.

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

Managerial	$66.62 (GS-13, Step 5, $41.64 + 60%)
Technical	$49.44 (GS-12, Step 1, $30.90 + 60%)
Clerical	$26.75 (GS-6, Step 3, $16.72 + 60%)

These rates are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 41 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. However, we have assumed that 10 percent of the existing respondents will make a physical/operational change by adding a green tire spray booth or a new line; these changes are not constructions or reconstructions and do not trigger applicability of this rule. The overall average number of respondents, as shown in the table below, is 41 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		
Year	(A) Number of New Respondents [1]	(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	4.1	41	0	4.1	41
2	4.1	41	0	4.1	41
3	4.1	41	0	4.1	41
Average	4.1	41	0	4.1	41

[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 41.

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
Notification of Method 25A test	3	1	0	3
Report of physical/operational changes	4.1	1	0	4.1
Notification of change in spray materials formulation	4.1	1	0	4.1
Semiannual report of excess emissions	13.67	2	0	27.3
Annual report of formulation data/Method 24	41	1	0	41
			Total	**79.5**

The number of Total Annual Responses is 80 (rounded).

The total annual labor costs are $2,050,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for

Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 17,700. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 221 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $16,400. 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 417 labor hours at a cost of $20,100. See Table 2: Average Annual EPA Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (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 labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 221 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0329. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0329 and OMB Control Number 2060-0156 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 – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal).

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total cost per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements [c]	1	1	1	41	41	2.05	4.1	$5,460.79
B. Required activities [d]								
Initial performance test [e]	240	5	1,200	0	0	0	0	$0
Repeat initial performance test [e]	240	1	240	0	0	0	0	$0
Monitoring of VOC emissions and operations [f]	1	350	350	41	14,350	717.5	1,435	$1,911,276.50
Monthly performance tests [f, k]	2	12	24	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of actual startup [e]	2	1	2	0	0	0	0	$0
Notification of initial performance test [e]	2	1	2	0	0	0	0	$0
Initial performance test results [e]	2	1	2	0	0	0	0	$0
Notification of Method 25A test [g]	4	1	4	3	12	0.6	1.2	$1,598.28
Notification of construction/reconstruction	2	1	2	0	0	0	0	$0
Report of physical operational	4	2	8	4.1	32.8	1.64	3.28	$4,368.63

changes [h]								
Report of spray materials/formulation change [h, i]	4	2	8	4.1	32.8	1.64	3.28	$4,368.63
Semiannual reports [j]	10	2	20	13.67	273.4	13.67	27.34	$36,414.15
Annual report of formulation data/Method 24 Results [k]	4	1	4	41	164	8.2	16.4	$21,843.16
Subtotal for Reporting Requirements					**17,142**			**$1,985,330**
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information [l]								
Record of startup, shutdown, and malfunction	0.5	25	12.5	41	512.5	25.63	51.25	$68,259.88
Records of monthly performance test	See 3B							
Records of emissions and operations	See 3B							
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**589**			**$68,260**
TOTAL LABOR BURDEN AND COST (rounded) [m]					**17,700**			**$2,050,000**
TOTAL CAPITAL AND O&M COST (rounded) [m]								**$16,400**
GRAND TOTAL (rounded) [m]								**$2,070,000**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources, one of which mixes only rubber compound. There will be no additional sources over the three-year period of this ICR. In addition, we have not included the reporting requirements burden for affected facilities exemptions under 40 CFR 60.676(d) in the table because their occurrence is very rare in practice.

[b] This ICR uses the following labor rates: $141.06 per hour for Executive, Administrative, and Managerial labor; $120.27 per hour for Technical labor, and $58.67 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, 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 all existing sources will have to re-familiarize with the regulatory requirements each year.

[d] We have assumed that the rubber tire manufacturing plants will not construct or reconstruct an affected facility, however, they will conduct operational changes on 10 percent of the affected operations.

[e] We have assumed that there will be no new sources expected over the three-year period of this ICR.

[f] Sources are required to monitor and record monthly performance tests, VOC use, the number of days in each compliance period, control device efficiency, formulation data or the results of Method 24 test analysis conducted to verify the VOC content of the spray, monitoring device data and other operational data such as the number of tires processed. We have assumed that sources will operate approximately 350 days per year or 50 weeks. We have further assumed that the burden incurred to record these items is one hour per occurrence.

[g] We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine the VOC concentration in each stack (source using a capture system) both entering and leaving the control device.

[h] We have assumed that 10 percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/operational change by adding a green tire spray booth or a new line.

[i] A source is required to do Method 24 test or formulation data analysis if the operational change involves spray materials formulation changes, and results should be reported within 30 days.

[j] We have assumed that one-third of the sources will submit exceedance reports for each six-month period.

[k] We have assumed that all existing sources, will submit an annual Method 24 test report or an annual formulation data report to verify the VOC content of each tread end cement and green tire spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources, will continue to use hazardous air pollutant (HAP) materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing to add on control devices. The remaining plants will use only water-based sprays and are not required to perform monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence per source due to the nature of the control equipment used and its intermittent use.

[l] We have assumed that there will be two occurrences of startup, shutdown, and/or malfunction per source every four weeks, which will yield and average of 25 occurrences per source per respondent in 50 weeks.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Renewal).

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total cost per year [b]
Notification of actual startup [c]	2	1	2	0	0	0	0	$0
Notification of initial performance test [c]	2	1	2	0	0	0	0	$0
Report of performance test results [c]	2	1	2	0	0	0	0	$0
Notification of construction/reconstruction [c]	2	1	2	0	0	0	0	$0
Notification of Method 25A test [d]	8	1	8	3	24	1.2	2.4	$1,330.70
Notification of change in spray materials formulation [e]	2	1	2	4.1	8.2	0.41	0.82	$454.66
Semiannual reports [f]	4	2	8	13.67	109.36	5.47	10.94	$6,063.57
Annual report of formulation data/Method 24 test results [g]	5	1	5	41	205	10.25	20.5	$11,366.43
Report of physical/operational changes [h]	4	1	4	4.1	16.4	0.82	1.64	$909.31
TOTAL LABOR BURDEN AND COST (rounded) [i]					**417**			**$20,100**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources one of which mixes only rubber compound. There will be no additional sources over the three-year period of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $66.62 for Managerial (GS-13, Step 5, $41.64 x 1.6), $49.44 for Technical (GS-12, Step 1, $30.90 x 1.6), and $26.75 for Clerical (GS-6, Step 3, $16.72 x 1.6). These rates are from the Office of Personnel Management (OPM) 2016 General Schedule which excludes locality rates of pay.

[c] We have assumed that there will be no new sources expected over the three-year period of this ICR.

[d] We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine the VOC concentration in each stack (source using a capture system) both enter and leaving the control device.

[e] We have assumed that a source is required to do Method 24 or formulation data analysis if the operational change involves spray materials formulation changes and results should be reported within 30 days.

[f] We have assumed that one-third of sources will submit exceedance reports for each six-month period.

[g] We have assumed that all existing sources will submit an annual Method 24 test report or an annual formulation data report to verify the VOC content of each tread end cement and green tire spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources will continue to use HAP materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing any add on control devices. The remaining plants use only water-based sprays and are not required to do monthly performance tests. We have assumed that the burden incurred to record these items is five hours per occurrence per source due to the nature of the control equipment used and its intermittent use.

[h] We have assumed that ten percent of the existing rubber tire manufacturing plants subject to the rule will make a physical/operational change due to adding a green tire spray booth or a new line.

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