

**Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBI**

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 <sup>a</sup>
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	41
B. Required activities <sup>d</sup>				
Initial performance test <sup>e</sup>	240	5	1,200	0
Repeat initial performance test <sup>e</sup>	240	1	240	0
Monitoring of VOC emissions and operations <sup>f</sup>	1	350	350	41
Monthly performance tests <sup>f,k</sup>	2	12	24	0
C. Create information	See 3B			
D. Gather existing information	See 3E			
E. Write report				
Notification of actual startup <sup>e</sup>	2	1	2	0
Notification of initial performance test <sup>e</sup>	2	1	2	0
Initial performance test results <sup>e</sup>	2	1	2	0
Notification of Method 25A test <sup>g</sup>	4	1	4	3
Notification of construction/reconstruction	2	1	2	0
Report of physical operational changes <sup>h</sup>	4	2	8	4.1
Report of spray materials/formulation change <sup>h,i</sup>	4	2	8	4.1
Semiannual reports <sup>j</sup>	10	2	20	13.67
Annual report of formulation data/Method 24 Results <sup>k</sup>	4	1	4	41
<b>Subtotal for Reporting Requirements</b>				
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 <sup>l</sup>				
Record of startup, shutdown, and malfunction	0.5	25	12.5	41
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			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>m</sup></b>				
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>m</sup></b>				
<b>GRAND TOTAL (rounded) <sup>m</sup></b>				

## Assumptions:

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources, one of v sources over the three-year period of this ICR. In addition, we have not included the reporting requirements burden for affected their occurrence is very rare in practice.
- <sup>b</sup> This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, Table 2. Civilian Workers, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those empl
- <sup>c</sup> We have assumed all existing sources will have to re-familiarize with the regulatory requirements each year.
- <sup>d</sup> We have assumed that the rubber tire manufacturing plants will not construct or reconstruct an affected facility, however, the operations.
- <sup>e</sup> We have assumed that there will be no new sources expected over the three-year period of this ICR.
- <sup>f</sup> Sources are required to monitor and record monthly performance tests, VOC use, the number of days in each compliance per Method 24 test analysis conducted to verify the VOC content of the spray, monitoring device data and other operational data si will operate approximately 350 days per year or 50 weeks. We have further assumed that the burden incurred to record these i
- <sup>g</sup> We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine th both entering and leaving the control device.
- <sup>h</sup> We have assumed that 10 percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/op
- <sup>i</sup> A source is required to do Method 24 test or formulation data analysis if the operational change involves spray materials forr
- <sup>j</sup> We have assumed that one-third of the sources will submit exceedance reports for each six month period.
- <sup>k</sup> We have assumed that all existing sources, will submit an annual Method 24 test report or an annual formulation data report spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sour (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing to add on control devices. The rem perform monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence intermittent use.
- <sup>l</sup> We have assumed that there will be two occurrences of startup, shutdown, and/or malfunction per source every four weeks, v respondent in 50 weeks.
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

3) (Renewal)

120.27      141.06      58.67

(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 <sup>b</sup>
41	2.05	4.1	\$5,460.79
0	0	0	\$0
0	0	0	\$0
14,350	717.5	1,435	\$1,911,276.50
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
12	0.6	1.2	\$1,598.28
0	0	0	\$0
32.8	1.64	3.28	\$4,368.63
32.8	1.64	3.28	\$4,368.63
273.4	13.67	27.34	\$36,414.15
164	8.2	16.4	\$21,843.16
<b>17,142</b>			<b>\$1,985,330</b>
512.5	25.63	51.25	\$68,259.88
<b>589</b>			<b>\$68,260</b>
<b>17,700</b>			<b>\$2,050,000</b>
			<b>\$16,400</b>
			<b>\$2,070,000</b>

responses hr/response  
80    221.25

which mixes only rubber compound. There will be no additional  
d facilities exemptions under 40 CFR 60.676(d) in the table because

: hour for Technical labor, and \$58.67 per hour for Clerical labor.  
, by Occupational and Industry group. The rates are from column 1,  
loyed by private industry.

ey will conduct operational changes on 10 percent of the affected

iod, control device efficiency, formulation data or the results of  
uch as the number of tires processed. We have assumed that sources  
tems is one hour per occurrence.

ie VOC concentration in each stack (source using a capture system)

erational change by adding a green tire spray booth or a new line.  
nulation changes, and results should be reported within 30 days.

to verify the VOC content of each tread end cement and green tire  
ces, will continue to use hazardous air pollutant (HAP) materials  
aining plants will use only water-based sprays and are not required to  
ce per source due to the nature of the control equipment used and its

which will yield and average of 25 occurrences per source per

**Table 2: Average Annual EPA Burden - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Ren**

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 <sup>a</sup>
Notification of actual startup <sup>c</sup>	2	1	2	0
Notification of initial performance test <sup>c</sup>	2	1	2	0
Report of performance test results <sup>c</sup>	2	1	2	0
Notification of construction/reconstruction <sup>c</sup>	2	1	2	0
Notification of Method 25A test <sup>d</sup>	8	1	8	3
Notification of change in spray materials formulation <sup>e</sup>	2	1	2	4.1
Semiannual reports <sup>f</sup>	4	2	8	13.67
Annual report of formulation data/Method 24 test results <sup>g</sup>	5	1	5	41
Report of physical/operational changes <sup>h</sup>	4	1	4	4.1
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>i</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources one of sources over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for govern \$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 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that there will be no new sources expected over the three-year period of this ICR.

<sup>d</sup> We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine t both enter and leaving the control device.

<sup>e</sup> We have assumed that a source is required to do Method 24 or formulation data analysis if the operational change involves within 30 days.

<sup>f</sup> We have assumed that one-third of sources will submit exceedance reports for each six month period.

<sup>g</sup> We have assumed that all existing sources will submit an annual Method 24 test report or an annual formulation data report spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sou that meet the green tire VOC limitations in NSPS not needing any add on control devices. The remaining plants use only wat We have assumed that the burden incurred to record these items is five hours per occurrence per source due to the nature of t

<sup>h</sup> We have assumed that ten percent of the existing rubber tire manufacturing plants subject to the rule will make a physical/o line.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ewal)

49.44      66.62      26.75

(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (F=Ex0.05 )	(G) Clerical person- hours per year (G=Ex0.1)	(H) Total cost per year <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
24	1.2	2.4	\$1,330.70
8.2	0.41	0.82	\$454.66
109.36	5.47	10.94	\$6,063.57
205	10.25	20.5	\$11,366.43
16.4	0.82	1.64	\$909.31
<b>417</b>			<b>\$20,100</b>

which mixes only rubber compound. There will be no additional

ment overhead expenses: \$66.62 for Managerial (GS-13, Step 5,  
se rates are from the Office of Personnel Management (OPM) 2016

the VOC concentration in each stack (source using a capture system)

spray materials formulation changes and results should be reported

to verify the VOC content of each tread end cement and green tire  
rces will continue to use HAP materials (VOC) in the spray at levels  
er-based sprays and are not required to do monthly performance tests.  
he control equipment used and its intermittent use.

perational change due to adding a green tire spray booth or a new