

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Final Rule for RTR Review Amendments)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments), EPA ICR Number 2598.02, OMB Control Number 2060-NEW.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asphalt Processing and Asphalt Roofing Manufacturing were proposed on November 21, 2001 (66 *FR* 58609), promulgated on May 7, 2003 (68 *FR* 24561), and amended on May 17, 2005 (70 *FR* 28360). These regulations apply to existing facilities and new facilities that manufacture asphalt roofing products or oxidized asphalt that are major sources of hazardous air pollutants (HAPs), or are collocated at major sources. New facilities include those that commenced construction or reconstruction after the date of the original proposal (November 21, 2001). This information is being collected to assure compliance with 40 CFR Part 63, Subpart LLLLL.

In general, all 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 NESHAP.

Any owner/operator subject to the provisions of 40 CFR Part 63 shall maintain a file containing these documents, and retain the file for at least five years following the date of such 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.

As part of the residual risk and technology review (RTR) for the NESHAP, the EPA is finalizing amendments to remove the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan and associated periodic report requirements; require periodic performance testing every five years, require electronic submittal of the notification of compliance status, results of performance evaluations of continuous monitoring systems, compliance reports, and performance test results; and make miscellaneous technical and editorial changes. The remaining portions of the NESHAP remain unchanged. This information collection request documents the recordkeeping and reporting requirements and incremental burden imposed by the final RTR amendments only.

The “Affected Public” includes owners and operators of major source asphalt processing or asphalt roofing manufacturing facilities. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL)(Residual Risk and Technology Review Amendments). The burden to the “federal government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments). All of these facilities are privately-owned, for-profit businesses. None of the facilities in the United States are owned by state, local, tribal or the federal government.

Over the next three years, 8 major source facilities will be subject to the standard, and no additional facilities will become subject to the standard. Four of the 8 major facilities are strictly asphalt processing facilities, and the other four operate an asphalt processing facility collocated with an asphalt roofing manufacturing facility. In addition, we assume there is no industry growth.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance”.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of HAP. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with Section 114(a)(3);
- and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from facilities that manufacture asphalt

roofing products or oxidized asphalt cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart LLLLLL.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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.

Initial performance tests for each air pollution control device (APCD) used to comply with the particulate matter (PM), total hydrocarbon (THC), opacity, and visible emission standards are required in order to determine an affected facility's initial capability to comply with the emission standard. As part of the final amendments, periodic performance tests for each such APCD are required in order to determine an affected facility's continuous capability to comply with the emission standards. Continuous emission or opacity monitors may be used to ensure compliance with the standard at all times. If continuous emissions or opacity monitors are not used, during the performance test a record of the operating parameters under which compliance was achieved must be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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 standard is 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. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart LLLLLL.

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

A public notice and solicitation of public comment on this collection was provided in the Federal Register notice of proposed rulemaking published on May 2, 2019 (84 CFR 18926). No public comments were received on this ICR.

3(c) Consultations

Industry groups including Asphalt Roofing Manufacturers Association (ARMA), the Asphalt Institute (AI), and member companies provided information concerning the NESHAP at meetings with the EPA prior to rule proposal and after rule proposal, but no input regarding this ICR was 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, then the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (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

None of these reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are facilities that manufacture asphalt roofing products or oxidized asphalt. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are shown below.

Standard (40 CFR Part 63, Subpart LLLLL)	SIC Codes	NAICS Codes
Asphalt Shingle and Coating Materials Manufacturing	2952	324122
Petroleum Refineries	2911	324110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL). The tables below reflect the final RTR amendments.

A source must make the following reports:

Notifications	
Notification of periodic performance test 1	§§ 63.7(b), 63.9(e), 63.8692(d)
Notification of compliance status	§ 63.8692(e)

Reports	
Periodic performance test results and performance test data	§§ 63.10(d)(2), 63.8693(f), 63.8692(e), 63.8693(b)(6), (c), (f), (g)

A source must keep the following records:

Recordkeeping	
Records of periodic performance tests	§§ 63.10(b)(2)(viii), 63.8694(a)(3)

Electronic Reporting

Currently, 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. As part of the RTR amendments, respondents are required to use the EPA's the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), to submit electronic copies of the notification of compliance status, results of performance evaluations of continuous monitoring systems, and compliance reports. Respondents are also required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. The ERT can be accessed via the CEDRI and CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The burden estimates in the current ICR for this rulemaking for notification and report submittal were not adjusted to account for the new requirement to report performance test results electronically. The current burden estimates for paper format submittal of reports and notifications are appropriate estimates for electronic submittal of these reports and notifications.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Perform periodic performance test.
Write the notification of periodic performance test.
Keep record of performance test results.
Submit the periodic performance test results.

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
Observe performance tests, 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 standard (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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments).

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 final RTR amendments to 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.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from the final RTR amendments recordkeeping and reporting requirements is estimated to be 69 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, the EPA's recent reevaluation of the source category inventory, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$149.35 (\$71.12+ 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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 of the final RTR amendments in the subject standard 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 monitor(s) and other costs such as photocopying and postage.

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

The capital/startup costs from the final RTR amendments associated with this ICR are \$0. No new facilities are expected to become subject to this regulation over the three years of the information collection.

For the 8 major source facilities subject to the standard as discussed in section 6(d), the annualized operation and maintenance (O&M) costs from the final RTR amendments associated with this ICR are \$88,400. This is the total of column D in the table “Operation and Maintenance (O&M) Costs” below. The average annual cost for capital/startup and operation and maintenance costs to industry from the final RTR amendments over the next three years of the ICR is estimated to be \$88,400. These are reporting and recordkeeping costs.

Operation and Maintenance (O&M) Costs			
(A)	(B)	(C)	(D)
Periodic 5-Year Test	Cost per Respondent, Annualized ^a	Number of Respondents ^b	Total Cost, Annualized (B X C)
PM control device ^c	\$27,700	1	\$27,700
Thermal oxidizer ^d	\$14,700	4	\$58,700
Opacity Testing ^e	\$500	4	\$2,000
Total			\$88,400

^a Assumes periodic testing of once per 5 years, with the first periodic test required within 3 years of the publication date of the final RTR amendments. Assumes the first periodic performance test would occur in the third year of this information collection, and this cost includes any contractor costs associated with repeat testing.

^b Assumes an average of 8 respondents per year would perform the following tests: (1) 4 asphalt roofing manufacturing facilities would conduct an EPA Method 5A test of the PM control device, an EPA Method 25A test of the thermal oxidizer, and an EPA Method 9 opacity test; and (2) 4 asphalt processing facilities would conduct an EPA Method 25A test of the thermal oxidizer and an EPA Method 9 opacity test. Assumes that 3 of the 4 asphalt roofing manufacturing facilities and 1 of the 4 asphalt processing facilities already perform all periodic performance testing under state agency permits; therefore, this information collection includes the cost for only the 4 remaining facilities not currently required to conduct periodic testing under state agency permits (1 asphalt roofing manufacturing facility and 3 asphalt processing facilities).

^c Assumes the contractor cost for PM control device performance testing using EPA Method 5A at a facility with 7 PM filters is \$83,100, based on a cost of \$16,500 for first filter and an add-on charge of \$11,100 for each additional filter.

^d Assumes the contractor cost for total hydrocarbon (THC) performance testing of a thermal oxidizer using EPA Method 25A is \$44,000.

^e Assumes the contractor cost for opacity testing using EPA Method 9 is \$1,500.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency due to the final RTR amendments associated with this ICR are those costs associated with analysis of the reported periodic performance testing information. The 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 from the final RTR amendments during the three years of the ICR is estimated to be \$1,730.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 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 below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments).

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 8 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 8 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	0	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

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 8.

The number of annual responses per year due to the RTR amendments 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 periodic performance test	4	0.33	0	1.33
Report of periodic performance test results	4	0.4	0	1.6
			Total	3

The number of Total Annual Responses is 3.

The total annual labor costs due to the RTR amendments are \$7,520. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments).

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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours due to the RTR amendments are 69. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments).

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 due to the RTR amendments is estimated to average 23 hours per response.

The total annual capital/startup and O&M costs to the regulated entity due to the RTR amendments are \$88,400. 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 due to the RTR amendments is estimated to be 37 labor hours at a cost of \$1,730. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments).

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 increase of 69 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This new burden results from RTR amendments, and includes primarily the addition of periodic five-year testing.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 23 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.

An electronic version of the public docket is available at <https://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) 566-1752. 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-2014-0087.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per occurrence	No. Of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hour/ year (E=CxD)	Management person-hour/ year (Ex0.05)	Clerical (Ex0.1)	Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with rule amendments:								
Existing Respondents ^c	4	0.33	1.33	8	10.67	0.53	1.07	\$1,343
B. Required activities:								
New and Existing Respondents								
Periodic 5-year performance testing ^d	24	0.4	9.6	4	38.4	1.92	3.84	\$4,836
C. Gather Existing Information	Included in 5D, 5E							
D. Write report								
Notification of periodic 5-year of performance test ^d	4	0.33	1.33	4	5.33	0.27	0.53	\$672
Reports of periodic 5-year performance test results ^d	Included in 4B, 5E							
<i>Subtotal for Reporting Requirements</i>						63		\$6,851
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							

D. Develop record system	NA							
E. Time to enter and transmit all information into record system								
Record of periodic performance tests ^d	4	0.33	1.33	4	5.33	0.27	0.53	\$672
F. Time to train personnel	Included in 4B							
G. Time for audits	N/A							
<i>Subtotal for Recordkeeping Requirements</i>						6		\$672
TOTAL LABOR BURDEN AND COST (rounded)^e						69		\$7,520
CAPITAL AND O&M COST (see Section 6(b)(iii))^e								\$88,400
TOTAL COST (rounded)^e								\$95,900

^a Assumes an average of 8 respondents per year over the next three years of this ICR and that no new facility per year will become subject to this regulation.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are from “column 1, Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Assumes 4 hours in the first year of this information collection for familiarization with the final rule amendments under the risk and technology review, annualized over the 3 years of this information collection.

^d All costs related to periodic testing are shown annualized over the 3 years of this information collection. Assumes that periodic testing will occur once every 5 years, and the first periodic performance test would occur within 3 years of the promulgation date of the final rule amendments. Assumes that the testing and reporting are conducted by an emissions testing contractor, and facility personnel will work on-site to assist the contractor. Assumes an average of 8 respondents would perform the following tests: (1) 4 asphalt roofing manufacturing facilities would conduct an EPA Method 5A test of the PM control device, an EPA Method 25A test of the thermal oxidizer, and an EPA Method 9 opacity test; and (2) 4 asphalt processing facilities would conduct an EPA Method 25A test of the thermal oxidizer and an EPA Method 9 opacity test. Assumes that 3 of the 4 asphalt roofing manufacturing facilities and 1 of the 4 asphalt processing facilities already perform all periodic performance testing under state agency permits; therefore, this information collection includes the cost for only the 4 remaining facilities not currently required to conduct periodic testing under state agency permits (1 asphalt roofing manufacturing facility and 3 asphalt processing facilities). Assumes that 20 percent of new respondents will repeat the performance tests due to failure.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL) (Residual Risk and Technology Review Amendments)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
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	Person-hours per occurrence	No. Of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
New and Existing Respondents								
Report of periodic 5-Year performance testing ^c	6.67	1.2	8.00	4	32.00	1.60	3.20	1,725.49
TOTAL ANNUAL BURDEN AND COST (rounded) ^d					37			\$1,730

^a Assumes an average of 8 respondents per year over the next three years of this ICR and that no new facility per year will become subject to this regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$64.80 (GS-13, Step 5), Technical rate of \$48.08 (GS-12, Step 1), and Clerical rate of \$26.02 (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) 2017 General Schedule which excludes locality rates of pay.

^c The EPA is requiring periodic performance testing once every 5 years, with the first periodic performance test required within 3 years of the promulgation date of the final rule. Assumes 20 hours for periodic performance test report review, annualized over the 3 years of this information collection. We have assumed that 20 percent of periodic performance tests will be repeated due to failure.

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