

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
Notification of periodic performance test	4.00	1	0	4.00
Report of periodic performance test results	4.00	1	0	4.00
			Total	8

New Respondents 0
Existing Respondents 8

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Asphalt Processing and As

\$112.98 \$149.35

Burden item	(A)	(B)	(C)	(D)	(E)	(F)
	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)
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	1.33	1	1.33	8	10.67	0.53
B. Required activities:						
New and Existing Respondents						
Periodic 5-year performance testing ^d	8	1.2	9.6	4	38.4	1.92
C. Gather Existing Information	Included in 5D, 5E					
D. Write report						
Notification of periodic 5-year of performance test ^d	1.33	1	1.33	4	5.33	0.27
Reports of periodic 5-year performance test results ^d	Included in 4B, 5E					
<i>Subtotal for Reporting Requirements</i>					63	
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	1.33	1	1.33	4	5.33	0.27
F. Time to train personnel	Included in 4B					
G. Time for audits	N/A					
<i>Subtotal for Recordkeeping Requirements</i>					6	
TOTAL LABOR BURDEN AND COST (rounded) ^e					69	
CAPITAL AND O&M COST (see Section 6(b)(iii)) ^e						
TOTAL COST (rounded) ^e						

- ^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 be regulated.
- ^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are from “column 1, Total Compensation.” The rates are 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 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 occurs every 5 years, and the first periodic performance test would occur within 3 years of the promulgation date of the final rule. Assumes that the testing and reporting are conducted by an emissions testing contractor, and facility personnel will work on-site. 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; the 4 asphalt processing facilities would conduct an EPA Method 25A test of the thermal oxidizer and an EPA Method 9 opacity test; the 4 asphalt roofing manufacturing facilities and 1 of the 4 asphalt processing facilities already perform all periodic performance tests under State Agency permits; therefore, this information collection includes the cost for only the 4 remaining facilities not currently performing periodic testing under State Agency permits (1 asphalt roofing manufacturing facility and 3 asphalt processing facilities). Assumes that new respondents will repeat the performance tests due to failure.
- ^e Total cost has been rounded to 3 significant figures. Figures may not add exactly due to rounding.

phalt Roofing Manufacturing (40 CFR Part 63, Subpart LLLLL)(Residual Risk and Technology Re

\$54.81

(G)	(H)
Clerical (Ex0.1)	Cost, \$ ^b
1.07	\$1,343.24
3.84	\$4,835.66
0.53	\$672
	\$6,851
0.53	\$672
	\$672
	\$7,520
	\$88,400
	\$95,900

New Respondents 0
Existing Respondents 8

Respondent Rates (Source: United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Costs of Labor, by Industry, by Labor Type, and by Compensation Component")		
Labor Type	Total Compensation (\$/hr)	Loaded Rate (Rate + 110%rate)
Mgmt.	\$71.12	\$149.35
Tech.	\$53.80	\$112.98
Cler.	\$26.10	\$54.81

9 hr/response

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Table 2: Average Annual EPA Burden and Cost – NESHAP for Asphalt Processing and Aspha

\$48.08 \$64.80

Burden item	(A)	(B)	(C)	(D)	(E)	(F)
	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)
New and Existing Respondents						
Report of periodic 5-Year performance testing ^c	6.67	1.2	8.00	4	32.00	1.60
TOTAL ANNUAL BURDEN AND COST (rounded) ^d					37	

Assumptions:

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government expenses: Managerial rate of \$64.80 (GS-13, Step 5), Technical rate of \$48.08 (GS-12, Step 1), and Clerical rate of \$26.08. 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 on the promulgation date of the final rule. Assumes 20 hours for periodic performance test report review, annualized over the 3-year collection. We have assumed that 20 percent of periodic performance tests will be repeated due to failure.

^d Total cost has been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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\$26.02

(G)	(H)
Clerical person-hours per year (Ex0.1)	Cost, \$^b
3.20	1,725.49
	\$1,730

Agency Rates

Source: Office of Personnel Management (OPM),
 2017 General Schedule

	Hourly Mean	With Fringe & Overtime
(GS- 12, step 1) - Tech.	30.05	\$48.08
(GS- 13, step 5) - Mgmt.	40.5	\$64.80
(GS-6, step 3) - Cler.	16.26	\$26.02

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Review Amendments)

Operation and Maintenance (O&M) Costs			
(A)	(B)	(C)	(D)
Periodic 5-Year Test	Cost, Annualized ^a	Number of Respondents ^b	Total Cost, Annualized (B X C)
PM control device ^c	\$27,700.00	1	\$27,700.00
Thermal oxidizer ^d	\$14,666.67	4	\$58,666.67
Opacity Testing ^e	\$500.00	4	\$2,000.00
Total			\$88,400.00

^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.

5-Year Periodic Testing Costs For Facilities Not Currently Required to			
Industry Sub-Group	Number of Facilities Not Currently Required to Test Under State Permit ^a (\$)	Average PM Test Cost per Facility (\$)	Average VE or Opacity Test Cost per Facility (\$)
Asphalt roofing manufactur	1	\$83,100.00	\$1,500.00
Asphalt processing facilitie	3	\$0.00	\$1,500.00

Total - Asphalt roofing manufacturing facilities and Asphalt processing facilities		4	
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^a Includes Hunt Southland Refining Co. - Sandersville, Certainteed Corp. (Oxford, NC), Wynnewood Refining C

Source: Appendix A from memo "Cost Impacts for the Asphalt Processing and Asphalt Roofing Manufacturing 2018

Facility Name	City	State	State Required 5-yr Tests
Hunt Refining Company	Tuscaloosa	AL	Yes
Owens-Corning	Minneapolis	MN	Yes
Southland Refining Co. - Sandersville	Heidelberg	MS	No
Certainteed Corp.	Oxford	NC	No
Owens-Corning Fiberglass Trunkline	Medina	OH	Yes
Wynnewood Refining Co.	Wynnewood	OK	No
Valero Refining Co.	Ardmore	OK	No
Certainteed Corp.	Shakopee	MN	Yes

¹ Cost of opacity testing using EPA Test Method 9 is estimated to be \$1,500. For each facility that has asphalt

² Cost of PM performance testing using EPA Test Method 5A is estimated to be \$16,500 for first filter and a

³ Cost of THC performance testing using EPA Test Method 25A is estimated to range from \$16,200 (concentration)

⁴ Costs not included for these facilities because they are already required to test every 5-yrs by the State permit

o Test Under State Permit

Average THC Test Cost per Facility (\$)	Total Average Test Cost Per Facility (\$)	Total Cost for Facilities Not Currently Required to Test Under State Permit ^a (\$)
\$55,000.00	\$139,600.00	\$139,600
\$44,000.00	\$45,500.00	\$136,500

		\$276,100
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Co., and Valero Refining Co.

Risk and Technology Review Proposal", September

Asphalt Storage Tanks ¹	Number of PM Control Devices	Number of Thermal Oxidizers	VE or Opacity Test Cost ¹ (\$)	PM Test Cost ² (\$)	THC Test Cost ³ (\$)	Total Test Cost (\$)
Yes	0	1	1,500	0	44,000	see footnote 4
Yes	3	1	1,500	38,700	44,000	see footnote 4
Yes	0	1	1,500	0	44,000	45,500
Yes	7	2	1,500	83,100	88,000	172,600
Yes	4	1	1,500	49,800	44,000	see footnote 4
Yes	0	1	1,500	0	44,000	45,500
Yes	0	1	1,500	0	44,000	45,500
Yes	3	1	1,500	38,700	44,000	see footnote 4
TOTAL COST OVER 5-YR PERIOD						309,100

It storage tanks, it was assumed that the facility would have at least one Method 9 test.

n add-on charge of \$11,100 for each additional filter.

tration) to \$44,000 (efficiency). We chose to be conservative and apply the higher cost of \$44,000.

itting agency and will not incur additional testing costs with the new testing requirements.

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