

**ATTACHMENT 1
SUPPORTING STATEMENT**

National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Con

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced P

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Reinforced Plasti

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Rei

Composites Production (40 CFR Part 63, Subpart WWWW)

Thermoplastic Composites Production NESHAP Residual Risk and Technology Review – Years 1-3

Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review

Thermoplastic Composites Production NESHAP Residual Risk and Technology Review - Year 1-3

Reinforced Plastic Composites Production NESHAP Residual Risk and Technology Review

Respondent Wages (\$2016)	
Category (1)	Hourly Mean Wage (2)
Technical	\$48.62
Managerial	\$64.74
Clerical	\$48.62

Footnotes:

(1) These rates are from the United States Department of Labor, Bureau of Economic Analysis, "May 2016 National Industry-Specific Occupational Employment and Wages by Detailed Occupation". The rates are from column "Hourly Mean Wage".
https://www.bls.gov/oes/current/naics4_326100.htm

(2) Selected "mean hourly wage" in the table referenced in footnote 1.

(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for fringe benefits available to those employed by private industry.

EPA Wages (\$2016)	
Category (1)	Hourly Mean Wage (2)
(GS- 12, step 1) - Technical	\$30.05
(GS- 13, step 5) - Managerial	\$40.50
(GS-6, step 3) - Clerical	\$16.26

Footnotes:

(1) The hourly mean wage for each category is based on 2017 wages, as reported in the 2013 ICR amendment.

(2) This value differs from the wages used in the 2013 ICR amendment because it is based on 2016 rates of pay.

(3) Wage with fringe and overhead is the hourly mean wage increased for the benefit packages available to government employees.

Loaded Wage (3)
\$102.11
\$135.96
\$102.11

u of Labor Statistics,
Wage Estimates NAICS
18, "Mean hourly wage."

nt for the benefit packages

Wage With Fringe & Overhead (3)
\$48.08
\$64.80
\$26.02

and are found here:

[salary-tables/17Tables/html](#)

ts, which were based on

by 60 percent to account

Table: Annual Respondent Burden and Cost – Boat Manufacturing NESHAP (40 CFR Part 63, Subpart W)

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
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 the regulatory requirement:		
i. Facilities with 4 groups of operations	12	1
ii. Facilities with 5 groups of operations	13	1
B. Required activities: Sources with add-on controls		
i. Initial performance test ^c	320	1
ii. Repeat of performance test	320	1
iii. Operation, maintenance, monitoring plan	40	1
iv. Startup, shutdown, malfunction plan	20	1
v. Monitoring of operating parameters and equipment ^d	See 5E	
C. Gather Existing Information	See 5D, 5E	
D. Write report ^{a, c}		
i. Notification of compliance status	4	1
ii. Notification of construction/ reconstruction ^a	2	1
iii. Notification of actual startup	2	1
iv. Notification of performance test	2	1
v. Reports of performance test results	See 4B	
vii. Report of exceedances ^f	16	2
viii. Report of no exceedances	8	2
ix. Startup, shutdown, malfunction report ^g	2	1
Subtotal for Reporting Requirements		
5. Recordkeeping Requirements		
A. Familiarization with the regulatory requirements	See 4A	
B. Plan activities	See 4B	
C. Implement activities	See 4B	
D. Develop record system (spreadsheets): ^h		
i. System for low HAP resin	4	1
ii. System for work practices	1	1
iii. System for add-on control devices	2	1
E. Time to enter and transmit all information into record system ^h		
i. Enter information on low HAP resin	10	1
ii. Enter information on work practices and operating parameters	N/A	

F. Develop operator training course and keep records of operators taken it	10	1
G. Time to train personnel:		
i. Small facilities (less than 100 employees)	2	1
	0.4	1
ii. Medium facilities (100-250 employees)	4	1
	0.8	1
iii. Large facilities (more than 250 employees)	8	1
	1.6	1
H. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded)^a		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^a		

Assumptions:

^a There is an average of 584 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. three year period of this ICR of which 93 percent (or 14.88) will consist of facilities with 4 groups of operations and 7 percent respondents per year over the next three year period of this ICR.

^b This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2: Civilian Workers, by Occupational and I increased by 110% to account for the benefit packages available to those employed by private industry.

^c New respondents have to comply with the initial rule requirements including notifications and performance tests. We have a therefore, will be require to conduct an initial performance test. We have assumed that performance tests are repeated by 20 p

^d Monitoring and recordkeeping of operations for respondents with enclosures and add-on control devices include: 1) specific start-up, shutdown, and malfunctions of equipment, and 3) work practices.

^e Monitoring and recordkeeping of operations for respondents that comply by limiting the HAP content of their raw materials material and the weighted-average HAP content over the past 12 months, and 2) work practices. However, if all the materials record HAP content and would not need to track monthly consumption or record the computations. For open molding and ce thirteen different processes (open molding) and two different processes (centrifugal casting to calculate the monthly average c casting operations).

^f We have assumed that approximately 80 percent of the 600 (or 480) existing respondents will report no excess emissions tw.

^g We have assumed that all RPC facilities with add-on controls (18 existing and 2 new each year or an average of 22) will ha the SSM plan.

^h New respondents (16) have to develop a record system. In addition, existing RPC facilities have to record operational data. centrifugal casting operations (452 existing and 14 new each year or an average of 480 per year) would have to record for low RPCs per year) would have to record add-on control devices operating parameters; and 3) all facilities (600) need to keep rec work practices are already monitored by industry for other purposes, we are not attributing these burdens to the rule.

ⁱ We have assumed that he amount of time it takes a respondent to train its employees would vary with the number of employ respondents would be identical to that of the existing PRC universe. Therefore, we have assumed that 82 percent of the respo 11 percent (i.e. 64.24 existing RPCs and 1.76 new RPCs per year), would be medium business, and 7 percent (i.e., 40.88 exist respondents will be providing full training to new employees only. Therefore, to train existing respondents, it will take 20 per

Table: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 1

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
Notification of applicability ^a	2	1
Notification of intent to construct a major source and review application	12	1
Notification of start of construction	2	1
Notification of actual startup	2	1
Notification of initial performance test and test plan	12	1.2
Report of performance test results including operating parameters	12	1.2
Notification of compliance status	2	1
Review reports of excess emissions ^c	4	2
Review reports of no excess emissions ^c	2	2
Review of startup, shutdown, malfunction report ^d	4	1
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a There is an average of 584 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. the three year period of this ICR. Therefore, there is an average of 600 total respondents per year over the next three year period. Of these respondents, 11 percent are medium size facilities and 7 percent are large facilities. Furthermore, we have assumed that 93 percent will consist of five groups of operations.

^b This cost is based on the following labor rates: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 + 60%), Technical rate of \$47.93 (GS-11, Step 5, \$29.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality pay packages available to government employees.

^c We have assumed that approximately 80 percent (or 480) of the respondents will report no excess emissions twice a year and 20 percent (or 120) will report no excess emissions once a year.

^d We have assumed that all RPC facilities with add-on controls (18 existing and 2 new each year or an average of 22) will have a malfunction report according to the plan.

WWW) (Amendments)

(C)	(D)	(E)	(F)	(G)	(H)
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
12	14.88	178.56	8.93	17.86	\$20,649.66
13	1.12	14.56	0.73	1.46	\$1,683.80
320	2	640	32	64	\$74,013.12
320	0.4	128	6.4	12.8	\$14,802.62
40	2	80	4	8	\$9,251.64
20	2	40	2	4	\$4,625.82
4	16	64	3.2	6.4	\$7,401.31
2	16	32	1.6	3.2	\$3,700.66
2	16	32	1.6	3.2	\$3,700.66
2	2	4	0.2	0.4	\$462.58
32	120	3840	192	384	\$444,078.72
16	480	7680	384	768	\$888,157.44
2	22	44	2.2	4.4	\$5,088.40
			14,694		\$1,477,616.43
4	14	56	2.8	5.6	\$6,476.15
1	16	16	0.8	1.6	\$1,850.33
2	2	4	0.2	0.4	\$462.58
10	480	4800	240	480	\$555,098.40

10	16	160	8	16	\$18,503.28
2	13.12	26.24	1.312	2.624	\$3,034.54
0.4	478.88	191.55	9.58	19.16	\$22,152.13
4	1.76	7.04	0.35	0.7	\$814.14
0.8	64.24	51.39	2.57	5.14	\$5,943.25
8	1.12	8.96	0.45	0.9	\$1,036.18
1.6	40.88	65.41	3.27	6.54	\$7,564.14
		6,195			\$622,935
		20,900			\$2,100,000
					\$476,000
					\$2,580,000

We have assumed that there will be an average of 16 new RPC facilities each year over the t (or 1.12) of facilities with 5 groups of operations. There is an average of 600 total

hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the industry group.” The rates are from column 1:”Total Compensation.” The rates have been

assumed that two new respondents per year will install add-on controls equipment and percent of the respondents.

operating parameters for each control device established during the performance test, 2)

include: 1) monitoring and recording in a spreadsheet the monthly consumption of ; in an operation meet the HAP content limit, then each respondent would need only to ntrifugal casting operations, respondents would also have the option of averaging among of the actual and allowable emissions for the combined open molding and centrifugal

ice a year and approximately 20 percent (or 120) will report excess emissions twice a year.

ve at least one startup, shutdown or malfunction (SSM) that is not managed according to

. In general, the following monitoring is required: 1) facilities with open molding and/or / HAP resins; 2) facilities with add-on controls (18 existing and 2 new or an average of 22 ords of its work practices. Since operating parameters for control equipment and standard

ees at its facility. We have also assumed that the distribution in size of the new ndents would be small business (i.e., 478.88 RPCs existing and 13.12 new RPC per year), ting RPCs and 1.12 new RPCs) are large business. Furthermore, we have assumed that cent of the time it takes to train new employees.

53, Subpart VVVV) (Renewal)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
2	2	4	0.1	0.4	\$203.07
12	16	192	0.8	19.2	\$9,495.76
2	16	32	0.8	3.2	\$1,624.56
2	16	32	0.8	3.2	\$1,624.56
14.4	2	28.8	0.1	2.88	\$1,423.11
14.4	2	28.8	0.1	2.88	\$1,423.11
2	16	32	0.8	3.2	\$1,624.56
8	120	960	6	96	\$47,604.60
4	480	1920	24	192	\$95,964.00
4	22	88	1.1	8.8	\$4,398.35
3,680					\$165,390

We have assumed that there will be an average of 16 new RPC facilities each year over the period of this ICR. We have assumed that 82 percent of the existing RPC facilities are small and that 20 percent of the new RPC facilities will consist of an average of four groups of operations and 7

of \$46.67 (GS-12, Step 1, \$29.17 + 60%), and Clerical rate of \$25.25 (GS-6, Step 3, \$15.78) rates of pay. The rates have been increased by 60 percent to account for the benefit

and approximately 20 percent (or 120) will report excess emissions twice a year.

have at least one startup, shutdown, or malfunction occurrence that is not managed

2014 ICR Wages	
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Technical	\$103.97
Managerial	\$129.93
Clerical	\$51.79

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 1 : Annual Respondent Burden and Cost Year One – Reinforced Plastic Composites Production NES

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements	4	1
4. Required activities for sources with add-on control devices ^c		
a. Initial performance test and report ^g	N/A	
b. Establish operating parameters ^g	N/A	
c. Re-evaluating startup, shutdown, and amlfucntion requirements	4	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^g	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^d	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^g	N/A	
b. Notification for new major sources ^g	N/A	
c. Request for compliance extension ^g	N/A	
d. Notification of special compliance requirements ^g	N/A	
e. Notification of performance tests ^d	N/A	
f. Notification of compliance status ^g	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^e	8	2
b. Additional reports for sources with add-on control devices ^d	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	4	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^f		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There

^b This ICR uses the following labor rates: \$135.95 per hour for Executive, Administrative, and Managerial labor; \$102.10 per United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates," from column 8, "Mean hourly wage." The rates have been increased by 110 percent to account for the benefit packages available.

^c We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and a

^d We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measures.

^e We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

^g We have assumed that no new facilities will become operational in the next three years.

HAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(C)	(D)	(E)	(F)	(G)	(H)
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
4	448	1792	89.6	179.2	\$202,630
4	448	1792	89.6	179.2	\$202,630
48	448	21504	1075.2	2150.4	\$2,431,554
		28,851			\$2,836,813.06
16	448	7168	358.4	716.8	\$810,518
4	448	1792	89.6	179.2	\$202,630
6	448	2688	134.4	268.8	\$303,944
		13,395			\$1,317,092
		42,246			\$4,153,905
					\$0
					\$4,154,000

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$41.77 per hour for Clerical labor. These rates are from the "Survey of Current Business, 2008, Supplement 1, "Wage and Wage Estimates NAICS 326100 – Plastics Product Manufacturing". The rates are comparable to those employed by private industry.

Adjusting recordkeeping and reporting to accommodate these changes.

15.

2016 ICR Wages	
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Technical	\$102.10
Managerial	\$135.95
Clerical	\$41.77

Table 2 : Annual Respondent Burden and Cost Year Two – Reinforced Plastic Composites Production NES

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	0	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report ^h	N/A	
b. Establish operating parameters ^h	N/A	
c. Re-evaluating startup, shutdown, and amlfucntion requirements	0	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^h	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^e	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^h	N/A	
b. Notification for new major sources ^h	N/A	
c. Request for compliance extension ^h	N/A	
d. Notification of special compliance requirements ^h	N/A	
e. Notification of performance tests ^e	N/A	
f. Notification of compliance status ^h	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^f	8	2
b. Additional reports for sources with add-on control devices ^e	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	0	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^g		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There

^b This ICR uses the following labor rates: \$135.95 per hour for Executive, Administrative, and Managerial labor; \$102.10 per United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates," from column 8, "Mean hourly wage." The rates have been increased by 110 percent to account for the benefit packages available.

^c We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and a

^d We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measures.

^e We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

^g We have assumed that no new facilities will become operational in the next three years.

^h We have assumed that no new facilities will become operational in the next three years.

SHAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(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 (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
0	448	0	0	0	\$0
0	448	0	0	0	\$0
48	448	21504	1075.2	2150.4	\$2,431,554
		24,730			\$2,431,554.05
16	448	7168	358.4	716.8	\$810,518
0	448	0	0	0	\$0
6	448	2688	134.4	268.8	\$303,944
		11,334			\$1,114,462
		36,064			\$3,546,016
					\$0
					\$3,546,000

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$41.77 per hour for Clerical labor. These rates are from the "Survey of Current Business, 2008, Supplement 1, "Wage and Wage Estimates NAICS 326100 – Plastics Product Manufacturing". The rates are comparable to those employed by private industry.

Adjusting recordkeeping and reporting to accommodate these changes.

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2016 ICR Wages	
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Technical	\$102.10
Managerial	\$135.95
Clerical	\$41.77

Table 3 : Annual Respondent Burden and Cost Year Three – Reinforced Plastic Composites Production NE

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	0	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report ^h	N/A	
b. Establish operating parameters ^h	N/A	
c. Re-evaluating startup, shutdown, and amlfucntion requirements	0	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^h	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^e	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^h	N/A	
b. Notification for new major sources ^h	N/A	
c. Request for compliance extension ^h	N/A	
d. Notification of special compliance requirements ^h	N/A	
e. Notification of performance tests ^e	N/A	
f. Notification of compliance status ^h	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^f	8	2
b. Additional reports for sources with add-on control devices ^e	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	0	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^g		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There

^b This ICR uses the following labor rates: \$135.95 per hour for Executive, Administrative, and Managerial labor; \$102.10 per United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates," from column 8, "Mean hourly wage." The rates have been increased by 110 percent to account for the benefit packages available.

^c We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and a

^d We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measures.

^e We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

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

^g We have assumed that no new facilities will become operational in the next three years.

^h We have assumed that no new facilities will become operational in the next three years.

ESHAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(C)	(D)	(E)	(F)	(G)	(H)
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
0	448	0	0	0	\$0
0	448	0	0	0	\$0
48	448	21504	1075.2	2150.4	\$2,431,554
		24,730			\$2,431,554.05
16	448	7168	358.4	716.8	\$810,518
0	448	0	0	0	\$0
6	448	2688	134.4	268.8	\$303,944
		11,334			\$1,114,462
		36,064			\$3,546,016
					\$0
					\$3,546,000

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$41.77 per hour for Clerical labor. These rates are from the "Survey of Current Business, 2014, Supplement 1, "Wage and Wage Estimates NAICS 326100 – Plastics Product Manufacturing". The rates are comparable to those employed by private industry.

adjusting recordkeeping and reporting to accommodate these changes.

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2016 ICR Wages	
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Technical	\$102.10
Managerial	\$135.95
Clerical	\$41.77

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requi

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	36,736	1,837	3,674	42,246	\$4,153,905	\$0
2	31,360	1,568	3,136	36,064	\$3,546,016	\$0
3	31,360	1,568	3,136	36,064	\$3,546,016	\$0
Total	99,456	4,973	9,946	114,374	\$11,245,937	\$0
Average	33,152	1,658	3,315	38,125	\$3,748,600	\$0

irements for the Reinforced Plastic Composites Production NESHAP (2018 RTR)

Total Costs
\$4,154,000
\$3,546,000
\$3,546,000
\$11,246,000
\$3,749,000

Table 5: Average Annual EPA Burden and Cost Year One – NESHAP for Reinforced Plastic Com

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc
- ^c We have assumed that respondents will each take 4 hours to enter and update information into agency recordkeeping system
- ^d We have assumed that all existing sources will be in compliance in year one.
- ^e We have assumed that there will be not new sources over the three-year period of this ICR.
- ^f We have assumed that it will take 2 hours to review the compliance status notification.
- ^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

posites Production NESHAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	448	576	28.8	57.6	\$30,760.70
2	448	288	14.4	28.8	\$15,380.35
8	448	1,152	57.6	115.2	\$61,521.41
			2,320		\$107,700

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
ality rates of pay.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 6: Average Annual EPA Burden and Cost Year Two – NESHAP for Reinforced Plastic Com

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc

^c We have assumed that respondents will each take 4 hours to enter and update information into agency recordkeeping system

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

Wastewater Treatment Plants Production NESHAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	448	576	28.8	57.6	\$30,760.70
2	448	288	14.4	28.8	\$15,380.35
8	448	1,152	57.6	115.2	\$61,521.41
			2,320		\$107,700

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
ality rates of pay.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 7: Average Annual EPA Burden and Cost Year Three – Reinforced Plastic Composites Proc

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 448 existing sources. There
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc
- ^c We have assumed that respondents will each take 4 hours to enter and update information into agency recordkeeping system
- ^d We have assumed that all existing sources will be in compliance in year one.
- ^e We have assumed that there will be not new sources over the three-year period of this ICR.
- ^f We have assumed that it will take 2 hours to review the compliance status notification.
- ^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

uction NESHAP (40 CFR Part 63, Subpart WWWW) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	448	576	28.8	57.6	\$30,760.70
2	448	288	14.4	28.8	\$15,380.35
8	448	1,152	57.6	115.2	\$61,521.41
			2,320		\$107,700

will be no additional sources over the three-year period of this ICR.
 ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
 ality rates of pay.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs
1	2,016	101	202	2,318	\$107,700	\$0
2	2,016	101	202	2,318	\$107,700	\$0
3	2,016	101	202	2,318	\$107,700	\$0
Total	6,048	302	605	6,955	\$323,100	\$0
Average	2,016	101	202	2,318	\$107,700	\$0

Requirements for the Reinforced Plastic Composites Production NESHAP (2018 RTR)

Total Costs
\$107,700
\$107,700
\$107,700
\$323,100
\$107,700