

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX) Residual Risk and Technology Reviews – Final Rule**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX), EPA ICR Number 1982.04.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX) were proposed on October 18, 2000, promulgated on July 9, 2002, and amended on both March 12, 2003 and April 20, 2006. These regulations apply to existing and new facilities that are involved in rubber processing, tire production, tire cord production, and puncture sealant application. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart XXXX.

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 this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, then the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 21 rubber tire manufacturing facilities, all which are owned and operated by the rubber tire manufacturing industry. None of the 21 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all privately-owned, for-profit businesses. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX) (New). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX) (New). 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 that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 21 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate includes 19 tire manufacturing facilities, and two tread or re-tread only manufacturing facilities.

This is a new information collection.

## **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 hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants 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 rubber tire manufacturing either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart XXXX.

### **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.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the standard are being met. The performance test may also be observed.

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

### **3. Non-duplication, Consultations, and Other Collection Criteria**

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

#### **3(a) Non-duplication**

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, duplication does not exist.

#### **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 (84 FR 58268) on October 30, 2019. No comments were received on the burden published in the Federal Register.

#### **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 these standards, 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 21 respondents will be subject to these standards over the three-year period covered by this ICR. This includes 19 tire manufacturing facilities and two tread or re-tread only manufacturing facilities.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we consulted with internal experts at EPA's Office of Air Quality and Planning Standards (OAQPS). OAQPS had previously contacted the U.S. Tire Manufacturers Association in developing a source count inventory.

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 these 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.

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 these 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 either 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 (CBI) (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 these standards 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 facilities. 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) 326211 for rubber tire manufacturing.

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Rubber Tire Manufacturing (40 CFR Part 63, Subpart XXXX).

A source must make the following reports:

<b>Notifications</b>	
Initial notifications that a source is subject to the provisions in Subpart XXXX or intent to construct/reconstruct.	63.9(a), 63.9(b), 63.6009(a), 63.6009(b), 63.6009(c)
Notification of performance test and test plan/QAPP.	63.7(b)(1), 63.7(c), 63.9(e), 63,6009(e)
Notification of compliance status.	63.9(h), 63.10(d), 63.5999(b), 63.6002(b) 63.6009(f)-(i)
Notification of alternative monitoring method.	63.8(f)
Notification of the results of the reassessment of the predominant use for coating web substrates	63.6009(j)

<b>Reports</b>	
Site-specific monitoring plan (only units with control devices)	63.6(e)(3), 63.5990(e)
Submit results of initial performance tests/compliance demonstrations (only units with control devices)	63.5991
Compliance status report, semi-annual for monthly average alternative	63.6010(c),
Compliance status report, annual for purchase alternative	63.6010(f)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of all notifications	63.6011(a)
Records of performance tests (only units with control devices)	63.10(b), 63.6011(a)
Purchase records (for purchase alternative)	60.6011(b), Table 9, item 1.a
Records of data and calculations to support demonstration of continuous compliance (monthly average no control device alternative)	63.6000, 63.6007, 63.6011(b)-(d) Tables 9, 11, 13
A record of Method 311 or approved alternative method results (for purchase or monthly average no control device alternative)	63.5985, 63.5987, Tables 9 and 11
Maintain a log detailing the operation and maintenance of the process and emission control equipment (only units with control devices)	63.5990(c), 63.5998
The results for each inspection, calibration, and validation check of your CPMS, as specified in your site-specific monitoring plan. (only units with control devices)	63.5995(a)(6), 63.6001
Records of operating parameter values for each operating parameter that applies to your facility (only units with control devices)	63.5990(c), 63.5989, 63.6001, Table 13

#### Electronic Reporting

Owners and operators of Rubber Tire Manufacturing NESHAP facilities must submit electronic copies of the required notification of compliance status reports required in 40 CFR 63.9(h) and 63.6009(k), performance test reports required in 40 CFR 63.6010(h), and semiannual compliance reports required in 40 CFR 63.6010(g) through the EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI).

#### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for parameters specified in your site-specific monitoring plan.
Perform initial and repeat performance test using Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 204, 25 or 25A, Reference Method 311 test (or alternative), and repeat performance tests 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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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.

<b>Agency Activities</b>
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, 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 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 below in Table 1: Annual Respondent Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX).

### **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 neither conduct nor 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 5,870 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, 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 only costs to the regulated industry resulting from information collection activities required by these subject standards are labor costs. There are no capital/startup or operation and maintenance costs because none of the affected sources are using control devices to comply with these same standards.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. For the rubber tire NESHAP, affected sources can achieve the required HAP emission reduction by product reformulation or the use of add-on controls. Based on consultations with the industry, none of the facilities are using control devices; therefore, there are no capital/startup or operation and maintenance 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 \$7,330.

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 Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX).

#### 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 23 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 23 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 <sup>1</sup>	(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	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. No new or modified/reconstructed sources are expected.

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 21.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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
Initial Notifications	0	1	0	0
Performance test notification	0	1	0	0
Compliance status notification	0	1	0	0
Notification of alternative monitoring method	0	1	0	0
Notification of reassessment of predominant use	0	1	0	0
Site-specific monitoring plan	0	1	0	0
Performance test reports	0	1	0	0
Semiannual compliance reports	13	2	0	26
Annual compliance reports	8	1	0	8
			<b>Total</b>	<b>34</b>

The number of Total Annual Responses is 34.

### **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 below in Tables 1 and 2 below, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 5,870 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX) (New).

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 172 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 156 labor hours at a cost of \$7,330; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX) (New).

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**

The amount of facilities was updated from 23 to 21 due to collocated facilities. Additionally, time was added for familiarization with the new standard, specifically the electronic reporting template. The number of sources presented in this ICR reflects current data obtained from industry, including information on the use of compliance alternatives used by the affected facilities. Based on consultations with the trade group, no facilities are using control devices to comply with the requirements.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 172 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 neither conduct nor 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-2017-0200. 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), WJC 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-2017-0200 and OMB Control Number 2060-NEW 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 – NESHAP for Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX) (New)**

Burden item	(A) Pers on hour s per occu rrence	(B) No. of occu rren ces per resp ondent per year	(C) Pers on hou rs per resp ondent per year (C= A x B)	(D) Resp onde nts per year <sup>a</sup>	(E) Tec hni cal per son - ho urs per yea r (E= C x D)	(F) Man agem ent pers on hour s per year (E x 0.05)	(G) Cl eri ca l pe rs on ho ur s pe r ye ar (E x 0. 1)	(H) Tota l Cost per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with rule requirements <sup>a</sup>	6	1	6	21	126	6.3	12.6	\$20,220.48
B. Required Activities								
i. Performance test	30	0.25	7.5	0	0	0	0	\$0
C. Create Information	See item 4.F							

D. Gather existing information	N/A							
E. Write reports								
i. Initial Notifications <sup>c</sup>	2	1	2	0	0	0	0	\$0
ii. Performance test notification <sup>d</sup>	2	1	2	0	0	0	0	\$0
iii. Compliance status notification <sup>c</sup>	2	1	2	0	0	0	0	\$0
iv. Notification of alternative monitoring method <sup>d</sup>	2	1	2	0	0	0	0	\$0
v. Notification of reassessment of predominant use <sup>e</sup>	2	1	2	0	0	0	0	\$0
vii. Site-specific monitoring plan <sup>d</sup>	20	1	20	0	0	0	0	\$0
viii. Performance test reports <sup>d</sup>	10	1	10	0	0	0	0	\$0
ix. Semiannual compliance reports <sup>f</sup>	8	2	16	13	208	10	20.8	\$33,379.84
x. Annual compliance reports <sup>g</sup>	8	1	8	8	64	3.2	6.4	\$10,270.72
<b>Subtotal for Reporting Requirements</b>					<b>458</b>	<b>\$63,871</b>		
4. Recordkeeping Requirements								
A. Familiarization with rule requirements	See 3.A							
B. Plan activities <sup>c</sup>	N/A - one-time upon beco							

	ming subje ct							
C. Implement Activities	N/A - cover ed by repor ting and recor dkee ping							
E. Develop record system <sup>c</sup>	N/A - one- time upon beco ming subje ct							
F. Time to enter information								
i. Records of notifications <sup>c</sup>	2	1	2	0	0	0	0	\$0
ii. Records of performance tests <sup>d</sup>	0.5	0.25	0.12 5	0	0	0	0	\$0
iv. Monthly Purchase records - purchase alternative <sup>g</sup>	2	12	24	8	192	9.6	19 .2	\$30, 812. 16
v. Compliance calculation and supporting data - monthly average option <sup>h</sup>	0.5	365	182. 5	13	2,3 73	118.6 3	23 7. 25	\$380 ,739
vi. Method 311 or alternative results <sup>i</sup>	0.5	12	6	21	126	6.3	12 .6	\$20, 220. 48



vii. Control equipment O&M log <sup>d</sup>	4	1	4	0	0	0	0	\$0
viii. CPMS calibration validation records <sup>d</sup>	1	1	1	0	0	0	0	\$0
ix. Operating parameters <sup>d</sup>	1	1	1	0	0	0	0	\$0
G. Time to train personnel	N/A - one-time upon becoming subject							
H. Store, file and maintain records <sup>j</sup>	4	12	48	21	1,008	50.4	10	\$161,763.84
I. Retrieve records/reports <sup>j</sup>	4	12	48	21	1,008	50.4	10	\$161,763.84
<b>Subtotal for Recordkeeping Requirements</b>					5,412	\$755,299		
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>k</sup></b>					<b>5,870</b>	<b>\$819,000</b>		
<b>Total CAPITAL and O&amp;M COST (rounded)<sup>k</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>k</sup></b>					<b>5,870</b>	<b>\$819,000</b>		

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX) (New)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person- hours per year (E x 0.05)	(G) Clerical person- hours per year (E x 0.1)	(H) Cost, \$ <sup>b</sup>
Review Initial notification reports <sup>c</sup>	2	0	0	0	0	0	0	\$0
Review Performance Test Notifications <sup>d</sup>	2	0.25	0.5	0	0	0	0	\$0
Review notifications of compliance status <sup>c</sup>	2	1	2	0	0	0	0	\$0
Review notifications of alternative monitoring <sup>d</sup>	2	2	4	0	0	0	0	\$0
Review notifications of reassessment of predominant use <sup>d</sup>	2	3	6	0	0	0	0	\$0
Review performance test results <sup>d</sup>	10	0.25	2.5	0	0	0	0	\$0
Review semiannual summary reports <sup>a</sup>	4	2	8	13	104	5.2	10.4	\$5,607.89
Review annual summary reports <sup>a</sup>	4	1	4	8	32	1.6	3.2	\$1,725.50
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>c</sup></b>						156		\$7,330

**Assumptions:**

<sup>a</sup> Based on recent updates to the facility inventory, we estimate there are approximately 23 respondents, including: 19 tire production, 2 tire and cord production, and 2 tread or retread-only facilities. No additional new or reconstructed sources becoming subject to the rule over the next three years. Facilities that are using the purchase option to comply will have to demonstrate monthly that only compliant coatings were used and are allowed to submit the reports annually instead of semi-annually. Facilities that are using the monthly compliance option will have to collect material usage data for the monthly average compliance calculation. We assumed daily data collection as a conservative estimate.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.80 for Managerial, \$48.08 for Technical, and \$26.02 Clerical. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule” which excludes locality rates of pay.

<sup>c</sup> These are initial rule requirements and apply to new sources only.

<sup>d</sup> Since no facilities are using control devices to comply with the rule, the performance test, alternative monitoring and start-up, shutdown and malfunction reports are not being submitted by industry and therefore do not need to be reviewed. In addition, we have assumed that no facilities are submitting notifications of reassessment of predominant use.

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