

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal), EPA ICR Number 1976.10, OMB Control Number 2060-0509.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) were proposed on August 2, 2001; promulgated on April 21, 2003; amended on August 25, 2005; and most-recently amended on March 20, 2020 (85 FR 15960). The most-recent amendments revised the startup, shutdown, and malfunction (SSM) provisions of the rule and finalized the use of electronic data reporting for performance test data submittals, notifications, and reports. This ICR incorporates the incremental burden from the ICR for the March 20, 2020 final rule (EPA ICR No. 1976.09). These regulations apply to existing facilities and new facilities with reinforced plastic composites (RPC) production operations and processes. New facilities include those that commenced construction, or reconstruction after May 17, 2019. This information is being collected to assure compliance with 40 CFR Part 63, Subpart WWWW.

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 of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. Also, if there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" includes owners and operators of RPC production operations and

processes. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal). The ‘burden’ to the “Federal Government” 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 Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal). There are approximately 448 reinforced plastics facilities, which are owned and operated by the reinforced plastics industry. None of the 448 facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 448 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The Office and 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 hazardous air pollutants. These standards are applicable to either 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, hazardous air pollutant (HAP) emissions from RPC production facilities 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 WWWW.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 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 either the Agency or its 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 that these standards are 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA requires that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b) and changes in information already provided in 40 CFR 63.9(j), performance test reports and results of performance evaluations in 40 CFR 63.5912(a) and (b), and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart WWWW. For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests and performance evaluations. The EPA is also requiring that 40 CFR Part 63, Subpart WWWW performance test reports and performance evaluations be submitted through the EPA's ERT.

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

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

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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* (68 FR 19256) on April 13, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

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 Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO 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 448 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Composites Manufacturer's Association (ACMA), at (703) 525-0511, and the Kohler Co., at (800) 456-4537.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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 that 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. The 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. The 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 owners and operators of RPC manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards and their corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR Part 63, Subpart WWWW)	SIC Codes	NAICS Codes
Custom Compounding of Purchased Plastic Resins	3087	325991
Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	3081	326113
Unlaminated Plastics Profile Shape Manufacturing	3082, 3089	326121
Plastics Pipe and Pipe Fitting Manufacturing	3084, 3089	326122
Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing	3083	326130
Polystyrene Foam Product Manufacturing	3086	326140
Plastics Plumbing Fixture Manufacturing	3088	326191
All Other Plastics Product Manufacturing	3999, 3089	326199
Pottery, Ceramics, and Plumbing Fixture Manufacturing	3261, 3262, 3263, 3264, 3269, 3299	327110
Cut Stone and Stone Product Manufacturing	3281	327991
Metal Window and Door Manufacturing	3442, 3444	332321
Metal Tank (Heavy Gauge) Manufacturing	3443	332420
Oil and Gas Field Machinery and Equipment Manufacturing	3533	333132
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing	3585	333415
Turbine and Turbine Generator Set Units Manufacturing	3511	333611
Industrial Truck, Tractor, Trailer, and Stacker Machinery Manufacturing	3537, 3799	333924

Audio and Video Equipment Manufacturing	3651, 3679	334310
Power, Distribution, and Specialty Transformer Manufacturing	3612	335311
Switchgear and Switchboard Apparatus Manufacturing	3613	335313
Noncurrent-Carrying Wiring Device Manufacturing	3644	335932
Automobile Manufacturing	3711	336111
Motor Vehicle Body Manufacturing	3711, 3713, 3714	336211
Motor Home Manufacturing	3716	336213
Travel Trailer and Camper Manufacturing	3792, 3799	336214
Motor Vehicle Electrical and Electronic Equipment Manufacturing	3647, 3694, 3714	336320
Other Aircraft Parts and Auxiliary Equipment Manufacturing	3728	336413
Railroad Rolling Stock Manufacturing	3743	336510
Wood Kitchen Cabinet and Countertop Manufacturing	2434, 2451	337110
Household Furniture (except Wood and Metal) Manufacturing	2499, 2519	337125
Institutional Furniture Manufacturing	2531, 2541, 2542, 2599, 3821, 3999	337127
Showcase, Partition, Shelving, and Locker Manufacturing	2426, 2511, 2514, 2542, 3089, 3429, 3499	337215
Sporting and Athletic Goods Manufacturing	3069, 3949	339920
Gasket, Packing, and Sealing Device Manufacturing	3053	339991

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW).

A source must make the following reports:

Notifications	
General references for notification requirements	§63.5905(a), Table 13, Table 15
Initial notification requirements	§63.9(b)(1), §63.9(b)(2), §63.9(b)(4), §63.9(b)(5)
Notification of compliance status when a source becomes subject to the standard	§63.9(h),
Notification that source is subject to special compliance requirements, if applicable	§63.9(d)
Notification of performance test 1	§63.7(b)(1), §§63.9(e),
Rescheduled of performance test	§63.7(b)(2)
Notification of performance evaluation, if using CMS	§63.8(e)(2)
Demonstration of continuous monitoring system, if using CMS	§63.9(g)
Change in information already provided	§63.5905(b), §63.9(j)
Request for an extension of compliance with relevant standard	§63.9(c)
Notification and one-time exemption request status if 100 tpy threshold exceeded	§§63.5805(e)-(f), §63.5910(f)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
General references for reporting requirements	§63.5910(a), Table 14, Table 15
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§63.5(d)(2)-(4)
Annual organic HAP emissions	§63.5799(b)(2) and (c)
Performance test results (electronic submission)	§63.10(d)(2), §63.5850(e)(4)(ii)
Report of performance evaluation, if using CMS (electronic submission)	§63.8(e)(5)(i)
Additional reporting requirements for CMS	§63.10(e)(1)-(3) , §63.5910(e)
Progress reports for compliance extension (if applicable)	§63.10(d)(4)1
Semiannual compliance reports (electronic submission)	§63.5910(c)-(e)

A source must keep the following records:

Recordkeeping	
General references for recordkeeping requirements	§63.5865, §63.5895, §63.5915, Tables 10, 11, 12 and 15
All reports and notifications and Documentation of initial notifications	§63.10(b)(1), §63.10(b)(2)(xiv), §63.5915(a)(1)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	§63.1(b)(3), §63.10(b)(3)
CMS records, records of flow monitoring, data on performance tests, CMS performance evaluations, measurements to determine performance test conditions, , calibrations, and adjustments	§§63.10(b)(2)(vi, vii, viii, ix, x, and xi), §63.10(c), §63.5915(a)(3)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	§63.10(b)(2)(xii)
Five-year retention of records	§63.10(b)(1) 1
If using add-on control device retain the monitoring records required in Part 63 Subpart SS	§63.5895(a), §63.5915(b), 63.998
Collect and keep records of resin and gel coat use, organic HAP content, and operation	§§63.5895(c), (d), §63.5865, Tables 10, 11 and 12
Record all times that wet area enclosures doors or covers are open, and that there is resin in the bath, for each pultrusion machine	§63.5895(e)
All data, assumptions and calculations used to determine organic HAP emission factors or content	§63.5915(c)
Certified statement of compliance with work practices	§63.5915(d)
Records showing compliance with percent reduction or lbs/ton requirements for continuous lamination/casting operations	§63.5915(e)(1)-(4)
Annual controlled and/or uncontrolled HAP emissions (as applicable)	§63.5865, Tables 10, 11 and 12
Destruction efficiency of add-on control device (if applicable)	§63.5865(a) and Tables 10 and 12
Capture efficiency of area enclosure (if applicable)	§63.5865, Tables 10, 11 and 12

Recordkeeping	
Annual organic HAP emissions that escape the enclosure	§63.5865, Table 11
Inlet and outlet organic HAP emissions (if applicable)	§63.5865, Tables 10 and 12
Enclosure meets Method 204 for a PTE (if applicable)	§63.5865, Tables 10, 11 and 12

Electronic Reporting

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.

The rule was recently amended to include electronic reporting provisions on March 20, 2020. Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and performance evaluations and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application, rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA’s CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual reports are to be created using Form 5900-566, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy Federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 18, 25A, 3B test, 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
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 standards 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The 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

We estimate that 69 percent of respondents are small businesses. The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastics Composites Production (40 CFR Part 63, Subpart WWW) (Renewal).

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 38,600 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 in the subject standard(s) 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 these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage. At this time, all facilities are estimated to comply with the rule using compliant materials, and no facilities operate add-on controls.

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

The total capital/startup costs for this ICR are zero. The total operation and maintenance

(O&M) costs for this ICR are zero. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be zero.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities 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 \$298,000.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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 448 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 448 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	448	0	0	448
2	0	448	0	0	448
3	0	448	0	0	448
Average	0	448	0	0	448

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 448.

The total number of annual responses per year 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
Initial notification that existing sources are subject to the standard	0	1	0	0
Notification for new major source	0	1	0	0
Request for compliance extension	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of performance tests	0	1	0	0
Notification of compliance status	0	1	0	0
Work practice requirements	448	12	0	5,376
Semiannual compliance reports for all sources	448	2	0	896
			Total	6,272

The number of Total Annual Responses is 6,272.

The total annual labor costs are \$4,570,000. Details regarding these estimates may be

found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 38,600 hours. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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 6 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity. 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 6,030 labor hours at a cost of \$298,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal).

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 increase in burden from the most-recently approved ICR is due to adjustment(s) increases. The adjustment increase in burden from the most-recently approved ICR is due to a

change in regulatory requirements stemming from the 2020 RTR ICR (EPA ICR No. 1976.09) and the incorporation of its burden into the currently approved ICR. Items added include burden for work practice requirements and time to record information. Work practice requirements have had significant impact on the burden since facilities are complying with the current regulations through pollution prevention measures rather than add-on control devices. The time to complete semiannual compliance reports and time to train personnel have also been adjusted. Reporting emissions exceedances or no emissions exceedances is included in the semiannual compliance reports, and the time to train personnel has been adjusted to represent facilities of any size. In addition, capital/startup and operation and maintenance costs have decreased from the previous ICR. It is estimated no new facilities will be subject to the rule, and that existing facilities are complying with the rule using compliant materials instead of add-on control devices.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 6 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0109. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2021-0109 and OMB Control Number 2060-0509 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 Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)

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-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (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 Regulatory Requirements ^c								
i. Facilities with 4 groups of operations	1.00	1	1	416.64	416.64	20.83	41.66	\$56,674.9
ii. Facilities with 5 groups of operations	1.25	1	1	31.36	39.20	1.96	3.92	\$5,332.3
iii. Familiarize with updated regulatory requirements ^e	4.00	1	4	0	0	0	0	\$0
B. Required activities: Sources with add-on controls ^f								
i. Initial performance test ^{d, f}	320	1	320	0	0	0	0	\$0
ii. Establish operating parameters ^{d, f}	10	1	10	0	0	0	0	\$0
iii. Re-evaluating startup, shutdown, and malfunction requirements ^e	4	1.00	4	0	0	0	0	\$0
iv. Monitoring of operating parameters and equipment ^f	See 5E							
C. Required activities: Sources								

using pollution prevention measures								
i. Develop recordkeeping system ^g	See 5D							
ii. Enter information into recordkeeping system	See 5E							
iii. Work practice requirements. ^f	4	12	48	448	21504.00	1075.20	2150.40	\$2,925,157
D. Gather Existing Information	See 5D, 5E							
E. Write report ^a								
i. Initial notification that existing sources are subject to the standard ^d	2	1	2	0	0	0	0	\$0
ii. Notification for new major sources ^d	2	1	2	0	0	0	0	\$0
iii. Request for compliance extension ^d	2	1	2	0	0	0	0	\$0
iv. Notification of special compliance requirements ^d	2	1	2	0	0	0	0	\$0
v. Notification of performance tests ^d	2	1	2	0	0	0	0	\$0
vi. Notification of compliance status ^d	2	1	2	0	0	0	0	\$0
x. Semiannual compliance reports for all sources ^g	8	2	16	448	7168	358	717	\$975,052.29
Subtotal for Reporting Requirements					33,497			\$3,962,216
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system (spreadsheets): ^d	6	1	6	0	0	0	0	\$0
E. Time to enter and transmit								

all information into record system								
i. Record information	6	1	6	448	2688	134	269	\$365,644.61
F. Develop operator training course and keep records of operators taken it ^d	10	1	10	0	0	0	0	\$0
G. Time to train personnel: ^h	4	1	4	448	1792	90	179	\$243,763
iv. Familiarize with CEDRI and CDX registration ^e	4	1	4	0	0	0	0	\$0.00
H. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						5,152		\$609,408
TOTAL LABOR BURDEN AND COST (rounded) ⁱ:						38,600		\$4,570,000
Capital and O&M Cost (rounded) ⁱ:								\$0
TOTAL COST (rounded) ⁱ:								\$4,570,000

Assumptions:

^a There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be no new RPC facilities each year over the three-year period of this ICR. We have assumed that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of five groups of operations.

^b This ICR uses the following labor rates: \$153.55 per hour for Executive, Administrative, and Managerial labor; \$122.20 per hour for Technical labor, and \$61.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, "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 We have assumed 93% of respondents have 4 groups of operations and 7% of respondents have 5 groups of operations.

^d We have assumed no new respondents over the next three years due to trends in industry consolidation. Because there are no new respondents, we expect no burden for this requirement.

^e This burden item includes initial rulemaking activities from the 2020 RTR. It reflects one time activities for existing respondents completed within the first year of promulgation. As such we estimate no burden for this requirement and have adjusted the number of respondents to zero to reflect this.

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

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

^h We have assumed that it takes four hours to train personnel.

¹Totals 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 Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW) (Renewal)

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-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ ^b
Enter and update information into agency recordkeeping system ^c	4	1	4	448	1792	89.6	179.2	\$102,959
Review initial notification for existing sources ^d	2	1	2	0	0	0	0	\$0
Notification for new major sources ^d	2	1	2	0	0	0	0	\$0
Review request for compliance extension ^d	2	1	2	0	0	0	0	\$0
Review special compliance requirements ^d	2	1	2	0	0	0	0	\$0
Review initial performance test and test plan ^{d,e}	12	1.2	14.4	0	0	0	0	\$0
Report of performance test results including operating parameters ^e	12	1.2	14.4	0	0	0	0	\$0
Semiannual compliance reports for all sources ^f	4	2	8	448	3584	22.4	358.4	\$195,093
Review compliance status ^{d,g}	2	1	2	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)^h					6,030			\$298,000

Assumptions:

^a There is an average of 448 existing reinforced plastic composites facilities (or RPC) subject to NESHAP subpart WWWW. We have assumed that there will be no new RPC facilities each year over the three-year period of this ICR. Furthermore, we have assumed that 93 percent of the new RPC facilities will consist of an average of four groups of operations and 7 percent will consist of five groups of operations.

^b This cost is based on the following labor rates: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1,

\$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2021 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.

^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 there will be no new sources over the three-year period of this ICR.

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

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

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

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

**Appendix A – Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2021-0109)**