

<b>Number of Respondents</b>					
	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 No Longer Subject to the Rule Due to Closure <sup>2</sup>	(E) Number of Respondents  (E=A+B+C-D)
1	38	9,715	0	10	9,743
2	38	9,743	0	10	9,771
3	38	9,771	0	10	9,799
Average	38	9,743	0	10	9,771

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

<sup>2</sup> On average, ten asbestos-containing waste disposal sites are expected to close over the next three years and will no longer be subject to the rule.

***ERG Notes:***

Table updated to include new respondents since prev ICR. Existing respondents in Yr 3 of prev ICR = 9,715 (assumes 8,753 demo/reno; 400 milling, manufacturing, and fabrication; and 560 landfills). This ICR also reflects 2 additional existing respondents at asbestos converting sources.

<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
<b>Asbestos converting operations</b>				
Notification and application for construction	0	1	0	0
Report on sample analyses performed during initial 90 days of operation	0	1	0	0
Quarterly operations and monthly sample analysis report	2	4	0	8
<b>Spraying operations</b>				
Notification of commencement of operations using materials containing >1% asbestos	0	1	0	0
Excepted waste shipment report	0	1	0	0
<b>Demolition/renovation</b>				
Notification by U.S. mail of intent to demolish or renovate	8,781	9	0	79,029
Renotification due to change	8,781	2	0	17,562
Malfunction Reports for owners/operators of ACPRPS Using CTPS AWP	20	2	0	40
Excepted waste shipment report	8,781	3	0	26,343
<b>Milling, manufacturing, and fabricating</b>				
Control device maintenance plan	40	1	0	40
Semiannual visible emissions report	400	2	0	800
Excepted waste shipment report	400	1	0	400
New source report	0	1	0	0
<b>Asbestos-containing waste disposal sites</b>				
New source report	10	1	0	10
Waste generator reports	560	1	0	560
Waste disposal discrepancy report	560	1	0	560
Improperly contained waste report	560	2	0	1,120
Notification of excavation of asbestos materials	0	1	0	0
Facility closure report	10	1	0	10
			Total	126,482

N/A - Not Applicable

hrs/response:

2

**ERG Review**  
-prev renewa

✓ **Notes:**

nl: 123,571 responses. Net increase due to decrease in electronic notifications.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Asbestos (40 CFR Part 61, Subpart M) (Renewal)**

Burden item	Labor Rates: \$122.20 \$153.55 \$61.51							
	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements	1.00	1	1	38	38	1.9	3.8	\$5,169.08
B. Required activities including monitoring or operations	See 3D							
C. Gather existing information	See 3D, 4E							
D. Write reports								
i. Asbestos converting operations								
Notification and application for construction	80	1	80	0	0	0	0	\$0
Report on sample analyses performed during initial 90 days of operation	2	1	2	0	0	0	0	\$0
Quarterly operations and monthly sample analysis report	2	4	8	2	16	1	2	\$2,176.46
ii. Spraying operations <sup>c</sup>								
Notification of commencement of operations using materials	N/A							
Notification of waste shipment report <sup>d</sup>	N/A							
iii. Demolition/renovation								
Notification by US Mail of intent to demolish or renovate	1	9	9	8,781	79,029	3,951.45	7,902.9	\$10,750,196.33
Renotification due to	0.25	2	0.5	8,781	4,390.5	219.53	439.05	\$597,233.13
Excepted waste shipment report <sup>d</sup>	1	3	3	8,781	26,343	1,317.15	2,634.3	\$3,583,398.78
Malfunction report if using CTPS AWP	2	2	4	20	80	4.00	8.0	\$10,882.28
iv. Milling, manufacturing, and fabricating								
Control device maintenance plan <sup>e</sup>	1	1	1	40	40	2	4	\$5,441.14
Semiannual visible emissions report	1	2	2	400	800	40	80	\$108,822.80
Excepted waste shipment report <sup>d</sup>	0.1	1	0.1	400	40	2	4	\$5,441.14
New source report	1	1	1	0	0	0	0	\$0

Source Type	Existing	New	Closures
Converting	2	0	0
Demo/Reno	8,781	28	0

ACPRPs using CTPS AWP	20	0	
Mill/Mfg/Fab	400	0	0
Waste disposal	560	10	10
<b>Total</b>	<b>9,743</b>	<b>38</b>	<b>10</b>

Updated # of each respondent to account for grow

9,771

9 annual occurrences applied to 100% of respondents, per discussion and clarification

Reflects 2 companies having up to 2 malfunction reports annually.

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
v. Asbestos-containing waste disposal sites								
New source report	1	1	1	10	10	0.5	1	\$1,360.29
Waste generator reports	0.67	1	0.67	560	375.2	18.76	37.52	\$51,037.89
Waste disposal discrepancy report <sup>f</sup>	1.5	1	1.5	560	840	42	84	\$114,263.94
Improperly contained waste report <sup>g, h</sup>	1.17	2	2.34	560	1,310.4	65.52	131.04	\$178,251.75
Notification of	2	1	2	0	0	0	0	\$0
Facility closure report	2	1	2	10	20	1	2	\$2,720.57
<b>Reporting Subtotal</b>						<b>130,332</b>		<b>\$15,416,396</b>
<b>4. Recordkeeping requirements</b>								
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information								
i. Asbestos converting operations								
Records of startup performance testing and initial 90 days of operations	0.1	1	0.1	0	0	0	0	\$0.00
Waste shipment records	0.1	12	1.2	2	2.4	0.12	0.24	\$326.47
ii. Spraying operations <sup>c</sup>								
Waste shipment records	N/A							
Excepted waste shipment report <sup>d</sup>	N/A							
iii. Demolition/renovation								
Waste shipment records	0.1	24	2.4	8,781	21,074.40	1,053.72	2,107.44	\$2,866,719.02
Cold weather temperature monitoring	0.1	147	14.7	0	0	0	0	\$0
Excepted waste shipment report <sup>d</sup>	0.1	3	0.3	8,781	2,634.3	131.7	263.43	\$358,339.88
iv. Milling, manufacturing, and fabricating								
Cold weather temperature monitoring	0.1	147	14.7	0	0	0	0	\$0
Daily visible emissions	0.1	637.5	63.75	400	25,500	1,275	2,550	\$3,468,726.75
Weekly inspection of air cleaning devices <sup>l</sup>	0.25	127.5	31.88	400	12,750	637.5	1,275	\$1,734,363.38
Waste shipment records	0.1	51	5.1	400	2,040	102	204	\$277,498.14
Excepted waste shipment report <sup>d</sup>	0.1	1	0.1	400	40	2	4	\$5,441.14
v. Asbestos-containing waste disposal sites								

ACPRPs using CTSP AWP

20

0

	A	B	C	D	E	F	G	H
Burden item	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
Time to file and mail waste generator reports	See 3D							
Waste shipment records	1.5	12	18	560	10,080	504	1,008	\$1,371,167.28
Waste management data retention until record closed OR utility record notation (if using CTPS AWP)	0.5	1	0.5	10	5	0.25	0.5	\$680.14
once inactive	0.5	1	0.5	20	10	0.50	1.0	\$1,360.29
F. Time to train personnel								
i. Asbestos converting operations	N/A							
ii. Spraying operations <sup>c</sup>	N/A							
iii. Demolition/renovation (refresher training) <sup>m</sup>	8	1	8	8,809	70,472	3,523.6	7,047.2	\$9,586,200.45
iv. Milling, manufacturing, and fabricating <sup>n</sup>	N/A							
v. Asbestos-containing waste disposal sites <sup>o</sup>	N/A							
G. Time for audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>166,299</b>		<b>\$19,670,823</b>
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>p</sup></b>						<b>297,000</b>		<b>\$35,100,000</b>
<b>TOTAL ANNUAL CAPITAL AND O&amp;M COST (SEE SECTION 6(b) (iii)) <sup>p</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (LABOR, CAPITAL, AND O&amp;M) <sup>p</sup></b>								<b>\$35,100,000</b>

ACPRPs using CTPS AWP

20

0

**Assumptions:**

a EPA estimates an average of 9,743 existing sources will be subject to the rule over the next 3 years. On average during this period, 38 new sources per year will become subject, while 10 existing sources per year will close and will cease to be subject to the rule. The net total is 9,771 sources per year (9,743 + 38 - 10 = 9,771).

The following is a detailed breakdown of the four source categories:

- 1) 2 existing asbestos converting sources. No new sources are expected.
- 2) 8,781 existing asbestos demolition/renovation sources. EPA assumes an increase of 28 new sources per year.
- 3) An annual average of 20 companies will use CTPS to conduct ACPRPs.
  - 4) 400 existing asbestos milling, manufacturing, and fabricating sources. No new sources are expected.
- 5) Approximately 560 sources will receive asbestos-containing wastes subject to the rule. No net growth will occur because an estimated 10 sites will close annually, while an estimated 10 sites will become subject to the rule by commencing acceptance of asbestos-containing wastes.

b This ICR uses the following labor rates: \$122.20 (technical), \$153.55 (managerial), and \$61.51 (clerical). 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." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

c EPA does not expect any spray operation sources will become subject to the rule over the next three years.

	A	B	C	D	E	F	G	H
Burden item	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>

ACPRPs using CTPS AWP

20

0

d Report notifying EPA that waste shipment records signed by owners/operators of disposal sites were not received by waste generators within 45 days of the date of waste acceptance by initial transporters.

e The rule requires sources to submit a control device maintenance plan for any air cleaning devices that cannot be inspected on a weekly basis. EPA assumes 10% of sources will submit such maintenance plans.

f Sources are required to submit reports if discrepancies between designated waste shipment and actual received quantities are not resolved with waste generators.

g Active waste disposal sites are required to report the presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers, and submit the waste shipment record.

h EPA assumes respondents will submit reports for improperly contained waste twice per year.

i EPA assumes asbestos-containing waste will not be excavated at any disposal site.

j EPA assumes approximately 4 million cubic yards of waste shipments will be recorded annually for all demolition/renovation contractors, and that each load will be about 20 cubic yards. This would result in approximately 200,000 loads annually (4 million cubic yards/20 cubic yards per load). We estimate approximately 24 loads per contractor per year.

k Based on Agency experience with the rule, operations generally cease from late fall into winter. We thus assume the burden for this activity will be negligible.

l EPA assumes sources will have an average of 2.5 control devices requiring monitoring, and that will operate for 255 days over 51 weeks, annually.

m EPA assumes all existing contractors (8,781) and new contractors entering the market for the first time (28) will spend resources annually on training due to employee turnover and new hires.

n EPA anticipates there will be no direct costs to respondents to train inspectors for Method 9 certification for daily visible emissions monitoring.

o EPA anticipates there will be no burden for waste disposal-related training.

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

Source Type	Existing	New	Closures
Converting	2	0	0
Demo/Reno	8,697	28	0
Mill/Mfg/Fab	400	0	0
Waste disposal	560	10	10
<b>Total</b>	<b>9,659</b>	<b>38</b>	<b>10</b>



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Asbestos (40 CFR Part**

Labor Rates: \$51.23

Burden item	A	B	C	D	E
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)
1. Asbestos converting operations					
A. Notification and application for construction	80	1	80	0	0
B. Report on sample analyses performed during initial 90 days of operation	1	1	1	0	0
C. Quarterly operations and monthly sample analysis	0.5	4	2	2	4
2. Spraying operations <sup>c</sup>					
A. Notification of commencement of operations using materials containing >1% asbestos	N/A				
B. Excepted waste shipment report	N/A				
3. Demolition/renovation					
A. Notification by US Mail of intent to demolish or renovate	0.25	6	1.50	8,781	13,171.50
C. Renotification due to change	0.25	2	0.5	8,781	4,390.5
D. Excepted waste shipment report	0.5	3	1.5	8,781	13,171.5
E. CTPS AWP Malfunction report	0.25	2	0.5	20	10.0
4. Milling, manufacturing, and fabricating					
A. Control device maintenance plan	0.25	1	0.25	40	10
B. Semiannual visible emissions report	0.1	2	0.2	400	80
C. Excepted waste shipment report	0.5	1	0.5	400	200
D. New source report	0.5	1	0.5	0	0
5. Asbestos-containing waste disposal sites					
A. New source report	0.5	1	0.5	10	5
B. Waste generator reports	4	1	4	560	2,240
C. Waste disposal discrepancy report	0.5	1	0.5	560	280

D. Improperly contained waste report	0.5	2	1	560	560
E. Notification of excavation of asbestos materials	2	1	2	0	0
F. Facility closure report	1	1	1	10	10
<b>TOTAL ANNUAL BURDEN AND COST<sup>d</sup></b>					<b>39,300</b>

**Assumptions:**

a EPA estimates an average of 9,743 existing sources will be subject to the rule over the next 3 years. On average will become subject, while 10 existing sources per year will close and will cease to be subject to the rule. The net change is 9,733 (9,743 - 10 = 9,733).

The following is a detailed breakdown of the four source categories:

- 1) 2 existing asbestos converting sources. No new sources are expected.
- 2) 8,781 existing asbestos demolition/renovation sources. EPA assumes an increase of 28 new sources per year.
- 3) An annual average of 20 companies will use CTPS to conduct ACPRPs.
  - 4) 400 existing asbestos milling, manufacturing, and fabricating sources.
- 5) Approximately 560 sources will receive asbestos-containing wastes subject to the rule. No net growth will occur annually, while an estimated 10 sites will become subject to the rule by commencing acceptance of asbestos-containing wastes.

b This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.71 (clerical). These rates are based on the General Schedule, 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 1.5%.

c EPA does not expect any spray operation sources will become subject to the rule over the next three years.

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

**61, Subpart M) (Renewal)**

\$69.04      \$27.73

<b>F</b>	<b>G</b>	<b>H</b>
<b>Management hours per year (Ex0.05)</b>	<b>Clerical hours per year (Ex0.10)</b>	<b>Annual cost (\$) <sup>b</sup></b>
0	0	\$0
0	0	\$0
0.2	0.4	\$229.82
658.58	1,317.15	\$756,768.53
219.53	439.05	\$252,256.18
658.58	1,317.15	\$756,768.53
0.50	1.00	\$574.55
0.5	1	\$574.55
4	8	\$4,596.40
10	20	\$11,491.00
0	0	\$0
0.25	0.5	\$287.28
112	224	\$128,699.20
14	28	\$16,087.40

**ERG Notes:**

Table 2 revised to address several inconsistencies identified in the previous

**EPA Notes:**

CTPS AWP malfunction reports added

28	56	\$32,174.80
0	0	\$0
0.5	1	\$574.55
		<b>\$1,960,000</b>

8800

age during this period, 38 new sources per year  
et total is 9,771 sources per year (9,743 + 38 -

ces. No new sources are expected.  
occur because an estimated 10 sites will close  
retaining wastes.

rates are from the Office of Personnel  
ed by 60 percent to account for the benefit

is ICR.

No Capital/Startup and O&M costs for this ICR.