

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal), EPA ICR Number 1964.10, OMB Control Number 2060-0496.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wet-formed Fiberglass Mat Production were proposed on May 26, 2000; promulgated on April 11, 2002; and amended on: April 20, 2006; February 28, 2019; and November 19, 2020. The NESHAP is codified at 40 CFR Part 63, Subpart HHHH. The NESHAP apply to wet-formed fiberglass mat production facilities that emit greater than, or equal to, 10 tons per year (tpy) of any one hazardous air pollutant (HAP) or greater than, or equal to, 25 tpy of any combination of HAP. Affected sources include new and existing drying and curing ovens. The pollutants regulated include organic HAP, using formaldehyde as a surrogate. New facilities include those that either commenced construction or reconstruction after the date of the original proposal (May 26, 2000). This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHH.

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. If there is no such delegated authority, the reports are sent directly to the EPA's 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" are owners or operators of wet-formed fiberglass mat production

facilities. The “burden” to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH)(Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-Formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal). There are approximately 7 wet-formed fiberglass mat production facilities. None of the facilities in the United States are owned by either state, local, or tribal entities or 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 is 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 7 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The Office of 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, HAP emissions, including formaldehyde and methanol, from drying and curing ovens at wet-formed fiberglass mat production sources 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 HHHH.

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 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, leaks are being detected and repaired, and that these same 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.

The EPA is requiring that owners or operators of affected sources submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of changes in information already provided as required in 40 CFR 63.9(j), and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI).

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 63, Subpart HHHH performance test reports 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

HHHH.

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 state and local agencies that have been delegated authority to do so. If a state or local agency has adopted under its own authority in 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* (86 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 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 7 respondents will be subject to these same standards over the three-year period covered by this ICR.

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 these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Asphalt Roofing Manufacturer's Association, at (443) 640-1075, and Johns Manville, at (303) 978-2000.

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 the 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 (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 or operators of facilities that produce wet-formed fiberglass mat subject to 40 CFR Part 63, Subpart HHHH. The North American Industry Classification System (NAICS) codes for respondents affected by the standards is 327212.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH).

A source must make the following reports:

Notifications	
Construction/reconstruction	§63.5(d)
Initial applicability of standard	§§63.9(b)(1), (2)
Actual startup	§63.9(b)(4)(v)
Source is subject to special compliance requirements, if applicable	§63.9(d)
Performance test	§§63.7(b), 63.9(e)
Compliance status when a source becomes subject to the standard	§§63.9(h), 63.3000(b)
Request for extension of compliance with relevant standard	§63.9(c)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), (j)

Reports	
Semiannual compliance reports	§§63.3000(c),

Reports	
	63.10(e)(3)
Continuous monitoring system (CMS) performance evaluation	§63.9(g)
Performance evaluation results	§§63.10(e)(2), 63.3000(e)
Performance test reports (electronic submission)	§§ 63.10(d)(2), 63.3000(e)(1)

A source must keep the following records:

Recordkeeping	
5-year retention of records	§§63.10(b)(1), 63.2999(a)
Records of maintenance on air pollution control and monitoring equipment	§§63.10(b)(2)(iii), 63.2998(d)
Records of performance tests, CMS performance evaluations, measurements, calibrations, and adjustments	§§63.10(b)(2)(vi-xi), (xiii); §§63.10(c)(1), (5-8), (10-14); §§63.10(d)(2), (e) (2), (3)
Operation, maintenance, and monitoring (OMM) plan	§63.2998(b)
Records of monitored parameter values for operating limits	§63.2998(c)
Documentation of initial notifications and notifications of compliance status	§63.10(b)(2)(xiv)
Number of failures to meet applicable standards For each failure: date, time, and duration; cause; a list of affected sources or equipment, noncompliant emissions estimates, and method used to estimate emissions; and actions taken to minimize emissions and corrective actions taken to return affected unit to normal operation	§63.2998(g)
Documentation for applicability determinations	§63.10(b)(3)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	§63.10(b)(2)(xii)
Records showing how the maximum residence time was derived	§63.2998(i)

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 amended to include electronic reporting provisions on February 28, 2019 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports 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. 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.
Install, calibrate, maintain, and operate CMS.
Perform initial performance test, EPA Reference Methods 1, 2, 3 or 3A, 4, and 316, 318, or 320, and repeat performance tests if necessary ¹
Write the notifications and reports listed above.
Enter information required to be recorded above.

¹ Methods 1-4, and 316 are the test methods referenced in subpart HHHH that are included in the ERT. Currently, Methods 318 and 320 (alternatives to Method 316 for formaldehyde measurement) are not yet supported by the ERT.

Respondent Activities
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 to 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. 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

There are no small entities (i.e., small businesses) affected by this regulation. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. 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 – NESHP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 1,470 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 NESHP 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in these regulations are labor costs. 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. 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 \$8,960.

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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 7 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 7 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	7	0	0	7
2	0	7	0	0	7
3	0	7	0	0	7
Average	0	7	0	0	7

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 7.

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
Notification of 5-year performance test/retest	2.16	1	0	2.16
Report of performance test/retest	2.16	1	0	2.16
Semiannual compliance reports	7	2	0	14
			Total	18.32

The number of Total Annual Responses is 18 (rounded).

The total annual labor costs are \$174,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 1,470 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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 80 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 180 labor hours at a cost of \$8,960; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (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

There is no change in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This ICR adjusts the time required for facilities to familiarize themselves with the rule requirements in each year from 8 hours per year for 2.33 respondents to 2 hours per year for 7 respondents; however, there is no significant change in the total burden hours due to rounding. There is also an increase in costs which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (March 2021) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 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-2021-0099. 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-2021-0099 and OMB Control Number 2060-0496 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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) Annual occurrences per respondent	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year^a	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Annual cost (\$)^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with rule requirements ^c	2	1	2	7	14.00	0.70	1.40	\$1,904.40
B. Required activities								
i. Initial performance tests ^d	200	1	200	0	0	0	0	\$0
ii. 5-year performance test ^d	221	1	221	1.8	397.8	19.89	39.78	\$54,112.14
iii. Repeat of performance test ^d	221	1	221	0.36	79.56	3.98	7.96	\$10,822.98
iv. Monitoring of operations and equipment ^e	See 4E							
v. Operation, maintenance, monitoring plan	40	1	40	0	0	0	0	\$0
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write reports ^{a, d}								
i. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
ii. Notification of actual startup	2	1	2	0	0	0	0	\$0
iii. Notification of applicability of standard	2	1	2	0	0	0	0	\$0
iv. Notification of performance test/retest	2	1	2	2.16	4.32	0.22	0.43	\$588.13
v. Notification of compliance status	2	1	2	0	0	0	0	\$0

Burden item	(A) Person- hours per occurrence	(B) Annual occurrences per respondent	(C) Person-hours per respondent per year (AxB)	(D) Respondent s per year^a	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Annual cost (\$)^b
vi. Reports of performance test/retest (through CEDRI using ERT) ^f	4	1	4	2.16	8.64	0.43	0.86	\$1,174.73
vii. Semiannual compliance report with instances of failure to meet applicable standards ^g	16	2	32	1.4	44.8	2.24	4.48	\$6,094.08
viii. Semiannual compliance report with no instances of failure to meet applicable standards ^g	8	2	16	5.6	89.6	4.48	8.96	\$12,188.15
Reporting Subtotal						735		\$86,884.61
5. Recordkeeping requirements								
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 required by the rule ^h	1.75	52	91	7	637	31.85	63.7	\$86,650.15
f. Time to train personnel	N/A							
g. Time for audits	N/A							
Recordkeeping Subtotal						733		\$86,650.15
TOTAL LABOR BURDEN AND COST (rounded)ⁱ						1,470		\$174,000
TOTAL CAPITAL AND O&M COST (rounded)ⁱ								\$0
GRAND TOTAL (rounded)ⁱ								\$174,000

Assumptions:

^a There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line and 2 with two lines, which are subject to this standard. We have assumed that there will be no new lines constructed over the three year period of this ICR.

^b This ICR uses the following labor rates: \$122.20 per hour for Technical labor, \$153.55 per hour for Executive, Administrative, and Managerial labor, and \$61.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics survey titled March 2021 National Occupational Employment and Wage Estimates United States.” The rates are from column 8, “Mean hourly wage.” The rates have been increased by 110% to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c We estimate that it will take the respondent 2 hours to read and understand rule requirements.

^d It is assumed there are no new sources subject to the initial rule requirements, including the initial performance test, over the three-year period of this ICR. The rule requires a performance test every five years since the initial test was conducted. We have estimated that each performance test will take approximately 21 hours to complete it since sources will be using EPA Method 316 to measure formaldehyde and applicable test methods specified in the NESHAP to determine resin free-formaldehyde content and the loss-on-ignition of the fiberglass mat. In addition, we have assumed that it will take approximately 200 hours to conduct the pretest survey, equipment calibration, and sample analysis and report preparation for a total of 221 hours per performance test. We have further assumed that 20 percent of the performance tests fail and will have to be repeated. There are an estimated 7 respondents, with 9 affected drying and curing ovens. On average each year, the number of respondents conducting the performance test is 1.8 ($9 / 5 = 1.8$). On average each year, the number of respondents repeating the performance test is 0.4 ($1.8 \times 0.2 = 0.36$).

^e Monitoring of operations include: 1) monitoring operating parameters for control equipment (i.e., thermal oxidizer or other control equipment); 2) urea-formaldehyde (UF) resin solids application rate; 3) resin-free formaldehyde content; 4) loss-on-ignition; 5) UF-to-latex ratio in the binder; 6) weight of the final mat product per roofing square; and 7) average nonwoven wet-formed fiberglass mat production rate (roofing square per hour).

^f There are an estimated 7 respondents (with 9 affected drying/curing ovens). On average each year, the number of respondents conducting a performance test or repeat performance test and electronically submitting their test results is 2.16 ($1.8 \text{ tests} + 0.36 \text{ retests}$).

^g We have assumed that approximately 80 percent of the 7 respondents (or 5.6) will report no instances of failure to meet applicable standards twice a year and approximately 20 percent (or 1.4) will report instances of failure to meet applicable standards twice a year.

^h We have assumed it takes each source approximately 1.75 hours per week to record and transmit the information and that a year will consist of 52 weeks.

ⁱ Totals 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 Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Renewal)

Burden item	(A) EPA person- hours per occurrence	(B) Annual occurrences per respondent	(C) EPA person-hours per respondent per year (AxB)	(D) Respondents per year^a	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Annual cost (\$)^b
Review initial notifications: applicability, performance test, compliance status ^a	2	3	6	0	0	0	0	\$0
Review notifications of 5-year performance test/retest ^b	2	1	2	2.16	4	0.2	0	\$248.43
Review performance test/reports ^c	8	1	8	2.16	17	0.9	2	\$992.60
Review semiannual reports								
Review reports of excess emissions ^d	16	2	32	1.4	45	2	4	\$2,573.98
Review reports of no excess emissions ^d	8	2	16	5.6	90	4.48	9.0	\$5,147.97
TOTAL COST (rounded)^f						180		\$8,960

Assumptions:

^a There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line and 2 with two lines, which are subject to this standard. We have assumed that there will be no new lines constructed over the three year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: 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.

^c The rule requires a performance test every five years since the initial test was conducted, which is applicable for this ICR renewal. The number of respondents that will conduct the performance test, averaged over the 3-year period of this ICR, is 1.8 (9 / 5 = 1.8). 20% of the respondents will repeat the performance test (1.8 x 0.2 = 0.36).

^d We have assumed that approximately 80 percent of the 7 respondents (or 5.6) will report no instances of failure to meet applicable standards twice a year and approximately 20 percent (or 1.4) will report instances of failure to meet applicable standards twice a year. Totals have been rounded to 3 significant figures.

^e Figures may not add exactly due to rounding.