

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (Re

| Number of Respondents | | | | | |
|------------------------------|----------------------------------|---------------------------------------|---|---|---|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
| Year | (A) Number of New Respondents | (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.

newal)

NESHAP for Wet-formed Fiberglass Mat Production (40 CFR Part 63, Subpart HHHH) (R

| 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 |
| Reports of performance test/retest | 2.16 | 1 | 0 | 2.16 |
| Semiannual compliance reports | 7.0 | 2 | 0 | 14.0 |
| | | | Total | 18.32 |

Footnotes:

a These notifications are initial notifications for sources constructed, modified or re-constructed after August 2011 and prior to September 2015.

hrs/response: 80

enewal)

ERG Notes:

Table 1: Annual Respondent Burden and Cost – NESHAP for Wet-formed Fiberglass Mat

| Burden item | (A) Person-hours per occurrence | (B) Annual occurrences per respondent | (C) Person-hours per respondent per year (AxB) |
|---|--|--|---|
| 1. Applications | N/A | | |
| 2. Survey and Studies | N/A | | |
| 3. Reporting requirements | | | |
| A. Familiarize with rule requirements ^c | 2 | 1 | 2 |
| B. Required activities | | | |
| i. Initial performance tests ^d | 200 | 1 | 200 |
| ii. 5-year performance test ^d | 221 | 1 | 221 |
| iii. Repeat of performance test ^d | 221 | 1 | 221 |
| iv. Monitoring of operations and equipment ^e | See 4E | | |
| v. Operation, maintenance, monitoring plan | 40 | 1 | 40 |
| c. Create information | See 3B | | |
| d. Gather existing information | See 3B | | |
| e. Write reports ^{a, d} | | | |
| i. Notification of construction/reconstruction | 2 | 1 | 2 |
| ii. Notification of actual startup | 2 | 1 | 2 |
| iii. Notification of applicability of standard | 2 | 1 | 2 |
| iv. Notification of performance test/retest | 2 | 1 | 2 |
| v. Notification of compliance status | 2 | 1 | 2 |
| vi. Reports of performance test/retest (through CEDRI using ERT) ^f | 4 | 1 | 4 |
| vii. Semiannual compliance report with instances of failure to meet applicable standards ^g | 16 | 2 | 32 |
| viii. Semiannual compliance report with no instances of failure to meet applicable standards ^g | 8 | 2 | 16 |
| Reporting Subtotal | | | |
| 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 |
| f. Time to train personnel | N/A | | |
| g. Time for audits | N/A | | |
| Recordkeeping Subtotal | | | |
| TOTAL LABOR BURDEN AND COST (rounded) ⁱ | | | |
| TOTAL CAPITAL AND O&M COST (rounded) ⁱ | | | |
| GRAND TOTAL (rounded) ⁱ | | | |

N/A - Not Applicable

Assumptions:

^a There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line 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, and \$185.46 per hour for Administrative. These rates are from the United States Department of Labor, Bureau of Labor Statistics survey titled March 2021 National Compensation Survey, rates are from column 8, "Mean hourly wage." The rates have been increased by 110% to account for varying industries 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 tests every five years since the initial test was conducted. We have estimated that each performance test will take approximately 200 hours to measure formaldehyde and applicable test methods specified in the NESHAP to determine resin free-formaldehyde content. We have assumed that it will take approximately 200 hours to conduct the pretest survey, equipment calibration, and sample collection. We have further assumed that 20 percent of the performance tests fail and will have to be repeated. There are an estimated 7 respondents, the number of respondents conducting the performance test is 1.8 ($9 / 5 = 1.8$). On average each year, the number of respondents conducting the performance test is 1.8.

^e Monitoring of operations include: 1) monitoring operating parameters for control equipment (i.e., thermal oxidizer inlet temperature, application rate; 2) resin-free formaldehyde content; 3) loss-on-ignition; 4) UF-to-latex ratio in the binder; 5) weight of 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 electronically submitting their test results is 2.16 (1.8 tests + 0.36 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.

^h We have assumed it takes each source approximately 1.75 hours per week to record and transmit the information.

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

Production (40 CFR Part 63, Subpart HHHH) (Renewal)

| (D) Respondents per year ^a | (E) Technical hours per year (Cx _D) | (F) Management hours per year (Ex _{0.05}) | (G) Clerical hours per year (Ex _{0.10}) | (H) Annual cost (\$) ^b |
|---|--|--|--|---|
| | | | | |
| | | | | |
| 7 | 14.00 | 0.70 | 1.40 | \$1,904.40 |
| | | | | |
| 0 | 0 | 0 | 0 | \$0 |
| 1.8 | 397.8 | 19.89 | 39.78 | \$54,112.14 |
| 0.36 | 79.56 | 3.98 | 7.96 | \$10,822.98 |
| | | | | |
| 0 | 0 | 0 | 0 | \$0 |
| | | | | |
| | | | | |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 2.16 | 4.32 | 0.22 | 0.43 | \$588.13 |
| 0 | 0 | 0 | 0 | \$0 |
| 2.16 | 8.64 | 0.43 | 0.86 | \$1,174.73 |
| | | | | |
| 1.4 | 44.8 | 2.24 | 4.48 | \$6,094.08 |
| 5.6 | 89.6 | 4.48 | 8.96 | \$12,188.15 |
| | 735 | | | \$86,884.61 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 7 | 637 | 31.85 | 63.7 | \$86,650.15 |
| | | | | |
| | | | | |
| | 733 | | | \$86,650.15 |
| | 1,470 | | | \$174,000 |
| | | | | \$0 |
| | | | | \$174,000 |

| Labor Rates: | |
|--------------|-----------|
| Management | \$ 153.55 |
| Technical | \$ 122.20 |
| Clerical | \$ 61.51 |

1 line and 2 with two lines, which are subject to this standard. We have assumed

Administrative, and Managerial labor, and \$61.51 per hour for Clerical labor. Bureau of Labor Statistics, Bureau of Economic Analysis, "National Occupational Employment and Wage Estimates United States." The Bureau of Economic Analysis, Bureau of Labor Statistics, "Industry wage rates and the additional overhead business costs of employing workers in manufacturing plants." Bureau of Economic Analysis, Bureau of Labor Statistics, "Employees.

test, over the three-year period of this ICR. The rule requires a performance test approximately 21 hours to complete it since sources will be using EPA Method 316 to determine the loss-on-ignition of the fiberglass mat. In addition, we have included analysis and report preparation for a total of 221 hours per performance test. We surveyed 7 respondents, with 9 affected drying and curing ovens. On average each oven of respondents repeating the performance test is 0.4 ($1.8 \times 0.2 = 0.36$).

1) for other control equipment); 2) urea-formaldehyde (UF) resin solids content of the final mat product per roofing square; and 7) average nonwoven wet-

respondents conducting a performance test or repeat performance test and

meet applicable standards twice a year and approximately 20 percent (or 1.4)

and that a year will consist of 52 weeks.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Wet-formed Fiberglass Mat

| 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 |
|---|--|--|---|--|
| Review initial notifications: applicability, performance test, compliance status ^a | 2 | 3 | 6 | 0 |
| Review notifications of 5-year performance test/retest ^b | 2 | 1 | 2 | 2.16 |
| Review performance test/reports ^c | 8 | 1 | 8 | 2.16 |
| Review semiannual reports | | | | |
| Review reports of excess emissions ^d | 16 | 2 | 32 | 1.4 |
| Review reports of no excess emissions ^d | 8 | 2 | 16 | 5.6 |
| TOTAL COST (rounded) ^f | | | | |

Assumptions:

^a There are an estimated 7 respondents (i.e., wet-formed fiberglass mat production facilities), 5 with one production line 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 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 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 performance test, averaged over the 3-year period of this ICR, is 1.8 (9 / 5 = 1.8). 20% of the respondents will repeat t

^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.

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

Production (40 CFR Part 63, Subpart HHHH) (Renewal)

| (E) Technical hours per year (Cx D) | (F) Management hours per year (Ex 0.05) | (G) Clerical hours per year (Ex 0.10) | (H) Annual cost (\$) ^b |
|---|---|---|---|
| 0 | 0 | 0 | \$0 |
| 4 | 0.2 | 0 | \$248.43 |
| 17 | 0.9 | 2 | \$992.60 |
| | | | |
| 45 | 2 | 4 | \$2,573.98 |
| 90 | 4.48 | 9.0 | \$5,147.97 |
| 180 | | | \$8,960 |

| Labor Rates: | |
|--------------|----------|
| Management | \$ 69.04 |
| Technical | \$ 51.23 |
| Clerical | \$ 27.73 |

ine and 2 with two lines, which are subject to this standard. We have

government overhead expenses: Managerial rate of \$69.04 (GS-13, step 3, \$17.33 + 60%). These rates are from the Office of Personnel

ICR renewal. The number of respondents that will conduct the performance test ($1.8 \times 0.2 = 0.36$)

meet applicable standards twice a year and approximately 20 percent