

ICR Summary Information

Hours per Response 40 CFR Part 60, Subpart PPP	42
Hours per Response 40 CFR Part 63, Subpart NNN	285
Number of Respondents	38
Total Estimated Burden Hours	5,580
Total Estimated Costs	\$1,250,000
Annualized Capital O&M	\$585,000
Total Annual Responses	76

Table 1a: Annual Respondent Burden and Cost - NSPS for Wool Fiberglass Insulation Manufacturing Pl:

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondents per Year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with regulatory requirements ^c	1	1	1	32.33
B. Required activities				
Initial performance tests ^d	72	1	72	0.33
Repeat performance tests ^e	72	0.2	14.4	0.07
C. Create information				
D. Gather existing information				
E. Write Report				
Notification of construction/reconstruction ^f	2	1	2	0.33
Notification of actual startup ^f	2	1	2	0.33
Notification of physical or operational change ^f	2	1	2	0
Notification of initial performance test ^f	2	1	2	0.33
Report of performance test	See 3B			
Semiannual exceedance report ^g	4	2	8	32.33
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements ^c	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system	N/A			
E. Time to enter information				
40 CFR Part 60, Subpart PPP				
Records of operating parameters and emissions ^{h,i}	0.25	250	62.5	32.33
Records of startups, shutdowns, and malfunctions ^j	1	1	1	32.33
F. Train Personnel	N/A			
G. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ^k				
TOTAL CAPITAL AND O&M COSTS (rounded) ^k				
GRAND TOTAL (rounded) ^k				

Assumptions:

^a We have assumed that there are approximately 32 respondents, with 1 additional new or reconstructed source becoming 0.33 new respondents per year).

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$11.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 1997, "Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for additional overhead business costs of employing workers beyond their wages and benefits, including business expenses for non-employees.

^c We have assumed that all existing respondents will each take one hour to re-familiarize with the regulatory requirements.

^d We assume that it will take each respondent 72 hours to complete initial performance tests.

^e We assume that 20 percent of respondents will have to repeat the initial performance tests due to failures.

^f We assume that each respondent will take two hours to prepare notification reports.

^g We assume that each respondent will take four hours to prepare semiannual report.

^h We assume that 0.25 hours is required to record operating parameters.

ⁱ We assume that each respondent will enter operating parameters and emissions records 250 days per year.

^j We assume that it will take one hour per year for each respondent to record startups, shutdowns, malfunctions, etc.

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

ants (40 CFR Part 60, Subpart PPP) (Renewal)

123.94 157.61 62.52

(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
32.33	1.62	3.23	\$4,464.34
24.00	1.20	2.40	\$3,314
0.96	0.05	0.10	\$133
0.67	0.03	0.07	\$92
0.67	0.03	0.07	\$92
0.00	0.00	0.00	\$0
0.67	0.03	0.07	\$92
258.67	12.93	25.87	\$35,714.75
366			\$43,902
2,021	101.04	202.08	\$279,022
32.33	1.62	3.23	\$4,464.34
2,361			\$283,486
2,730			\$327,000
			\$533,445
			\$860,000

2,730

42 hours per response

ning subject to the rule in the next three years (an average

23.94 per hour for Technical labor, and \$62.52 per hour
er 2021, “Table 2: Civilian Workers, by Occupational and
t to account for varying industry wage rates and the
ses associated with hiring, training, and equipping their

ments each year.

Table 1b: Annual Respondent Burden and Cost - NESHAP for Wool Fiberglass Insulation Manufacturing

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondents per Year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with regulatory requirements ^c	1	1	1	5
B. Required activities				
Initial performance tests ^d	980	1	980	0
Repeat initial performance tests ^e	980	0.2	196	0
Operations, maintenance, and monitoring plan ^f	40	1	40	0
C. Create information	8	1	8	5
D. Gather existing information				
E. Write Report				
Notification of applicability ^g	2	1	2	0
Notification of construction/reconstruction ^g	2	1	2	0
Notification of actual startup ^g	2	1	2	0
Notification of special compliance requirements ^g	2	1	2	0
Notification of initial performance test ^g	2	1	2	0
Notification of compliance status ^g	2	1	2	0
Request for extension of compliance, adjustments to time periods, and changes in information ^{g,h}	2	1	2	0
Report of performance test	See 3B			
Excess emissions report ^{h, n}	16	2	32	1
Report of no excess emissions ^{n, l}	1	2	2	4
Quality improvement plan ^m	40	1	40	0
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements ^c	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system	N/A			
E. Time to enter information				
Records of operating parameters and emissions ⁿ	9	52	468	5
F. Train Personnel	N/A			
G. Audits	N/A			
H. Time to transmit or disclose information ^o	8	1	8	6.5
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^p				
TOTAL CAPITAL AND O&M COSTS (rounded)^p				
GRAND TOTAL (rounded)^o				

Assumptions:

- ^a We have assumed that there are approximately 5 respondents, with no new or reconstructed sources becoming sub.
- ^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$1 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent additional overhead business costs of employing workers beyond their wages and benefits, including business expenses for employees.
- ^c We have assumed that all existing respondents will each take one hour to re-familiarize with the regulatory requirements.
- ^d We assume that it will take each respondent 980 hours to complete initial performance tests.
- ^e We assume that 20 percent of respondents will have to repeat the initial performance tests due to failures.
- ^f We assume that each respondent will take 40 hours to prepare the operations, maintenance, and monitoring plan.
- ^g We assume that it will take each respondent two hours to prepare each of the notifications.
- ^h We assume that it will take each respondent one hour to write the extension of compliance; adjustments to time period.
- ⁱ We assume that it will take each respondent 16 hours to prepare excess emissions reports.
- ^j We assume that 20 percent of respondents are required to prepare excess emissions reports.
- ^k We assume that each respondent will take one hour to prepare no excess emissions reports.
- ^l We assume that 80 percent of respondents will submit the no excess emissions reports.
- ^m We assume that 40 percent of respondents are required to prepare the quality improvement plan.
- ⁿ We assume that it will take each respondent nine hours each week to record records of operating parameters and emissions.
- ^o It is assumed there are approximately 6.5 flame attenuation lines for which respondents are required to transmit in flame attenuation lines at 2 facilities, and this ICR assumes these estimates decreased proportionally with the number of facilities.
- ^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

g Plants (40 CFR Part 63, Subpart NNN) (Renewal)

123.94 157.61 62.52

(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
5	0.25	0.5	\$690.36
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
40	2	4	\$5,522.90
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
32.0	1.6	3.2	\$4,418.32
8	0.4	0.8	\$1,104.58
0	0	0	\$0
98			\$11,736
2,340	117	234	\$323,089.65
52	3	5.2	\$7,179.77
2,751			\$330,269
2,850			\$342,000
			\$47,000
			\$389,000

2,850

285 hours per response

ject to the rule over the next three years.

\$123.94 per hour for Technical labor, and \$62.52 per hour for 2021, “Table 2: Civilian Workers, by Occupational Percent to account for varying industry wage rates and the costs associated with hiring, training, and equipping their

ments each year.

periods, and changes in information reports.

missions.

formation. The 2015 RTR assumed the burden for 13 percent of sources.

143 hours per response

Table 2a: Average Annual EPA Burden and Cost – NSPS for Wool Fiberglass Insulation Manufacturing Plants (4

52.37

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)
1. Initial performance tests					
A. New or modified plant ^c	24	1	24	0.33	8
2. Repeat performance tests			0		
A. New or modified plant ^{c, d}	24	0.2	4.8	0.07	0.32
3. Report Review					
A. New or modified plant					
Notification of construction/reconstruction	2	1	2	0.33	0.67
Notification of actual startup	1	1	1	0.33	0.33
Notification of physical or operational change	2	1	2	0	0.00
Notification of initial performance test	1	1.2	1.2	0.33	0.40
Review performance test results ^e	8	1.2	9.6	0.33	3.20
Review semiannual exceedance/no exceedance reports ^f	2	2	4	32.33	129.33
TOTAL COST (rounded) ^g					

Assumptions:

^a We have assumed that there are approximately 32 respondents, with 1 additional new or reconstructed source becoming su average of 0.33 new respondents per year).

^b This ICR uses the following labor rates: \$70.56 per hour for Managerial labor; \$52.37 per hour for Technical labor, and \$2 rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. Th account for the benefit packages available to government employees.

^c We have assumed that it will take 24 hours to observe the performance testing for each new plant.

^d We assume that 20 percent of new or modified plants will have to repeat performance test due to failures.

^e We assume that EPA will take 8 hours 1.2 times per year to review the performance test results reports for each new or mc

^f We have assumed that EPA will take two hours two times per year per plant to review the semiannual exceedance/no exce

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

0 CFR Part 60, Subpart PPP) (Renewal)

70.56 28.34

(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
0.4	0.8	\$470
0.016	0.032	\$19
0.03	0.07	\$39
0.02	0.03	\$20
0.00	0.00	\$0
0.02	0.04	\$23
0.16	0.32	\$188
6.47	12.93	\$7,596.01
164		\$8,350

164 228
\$11,600



bject to the rule in the next three years (an

8.34 per hour for Clerical labor. These
e rates have been increased by 60% to

odified plant.

odance reports

Table 2b: Average Annual EPA Burden and Cost - NESHAP for Wool Fiberglass Insulation Manufacturing Plant

52.37

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)
1. Initial performance tests					
A. New or modified plant ^c	40	1	40	0	0
2. Repeat performance tests					
A. New or modified plant ^{c, d}	40	0.2	8	0	0
3. Report Review					
A. New or modified plant					
Notification of applicability ^e	2	1	2	0	0
Notification of construction/reconstruction ^e	2	1	2	0	0
Notification of actual startup ^e	2	1	2	0	0
Notification of special compliance requirements ^e	1	1	1	0	0
Notification of initial performance test ^e	2	1	2	0	0
Notification of compliance status ^e	2	1	2	0	0
Request for extension of compliance, adjustments to time periods, and changes in information ^f	2	1	2	0	0
Report of initial performance test	40	1	40	0	0
Excess emissions report ^g	20	2	40	1	40
Report of no excess emissions ^h	2	2	4	4	16
Quality improvement plan ⁱ	40	1	40	0	0
Operations, maintenance, and monitoring plan ⁱ	40	1	40	0	0
TOTAL COST (rounded)^j					

Assumptions:

^a We have assumed that there are approximately 5 respondents, with no additional new or reconstructed sources becoming s

^b This ICR uses the following labor rates: \$70.56 per hour for Managerial labor; \$52.37 per hour for Technical labor, and \$ rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. T account for the benefit packages available to government employees.

^c We have assumed that it will take 40 hours to observe the performance testing for each new plant.

^d We assume that 20 percent of new or modified plants will have to repeat performance test due to failures.

^e We assume that EPA will take two hour once per year to review the notification reports for each new or modified plant.

^f We assume that EPA will take two hours once per year to review the request for each new or modified plant.

^g We assume that 20 percent of plants will submit excess emissions reports twice per year.

^h We assume that 80 percent of plants will submit the no excess emissions report twice per year.

ⁱ We assume that it will take 40 hours once per year to review plans.

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

ts (40 CFR Part 63, Subpart NNN) (Renewal)

70.56 28.34

(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Cost, \$ ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.0	4	\$2,349.28
0.8	1.6	\$939.71
0	0	\$0
0	0	\$0
64		\$3,290

64

subject to the rule over the next three years.

28.34 per hour for Clerical labor. These
 he rates have been increased by 60% to

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
NSPS for Wool Fiberglass Insulation Manufacturing Plants (40 CI)			
Particulate Matter Monitoring	\$15,000	0.33	\$4,950
NESHAP for Wool Fiberglass Manufacturing Plants (40 CI)			
Baghouse Leak Detection	\$9,100	0	\$0
Furnace Temperature Monitoring	\$1,500	0	\$0
Formaldehyde Emission Monitoring	\$15,000	0	\$0
Chromium Compound Testing ^b	\$0	0	\$0
Phenol, Methanol and Formaldehyde Testing ^c	\$0	0	\$0
Total (rounded) ^d			\$5,000

^a In order to calculate O&M costs for 40 CFR Part 63, Subpart NNN, the estimates provided in column F were based on the number of continuous monitoring devices that exist within the industry; some respondents may have more than the number of continuous monitoring devices decreased proportionally with the number of sources.

^b It is assumed there are approximately 4 gas-fired furnaces at 3 facilities. Chromium compound testing is required for Residual Risk and Technology Review (RTR) assumed 8 gas-fired furnaces at 5 facilities, and this ICR assumed

^c It is assumed that one facility has approximately 6.5 flame attenuation lines. Phenol, methanol, and formaldehyde testing is assumed \$4,000 per test. (\$4,000 per test x (1 test / 5 years) = \$800/yr). The 2015 RTR assumed 13 flame attenuation lines, and this ICR assumed 13 flame attenuation lines proportionally with the number of sources.

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

(O&M) Costs		
(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^a	Total O&M, (E X F)
40 CFR Part 60, Subpart PPP)		
\$16,500	32.33	\$533,445
40 CFR Part 63, Subpart NNN)		
\$500	3.5	\$1,750
\$0	2.5	\$0
\$0	8.5	\$0
\$10,000	4	\$40,000
\$800	6.5	\$5,200
		\$580,445

\$585,445

are not based on the number of respondents but, instead, based on the total number of continuous monitoring devices located at their facility. We assumed

required annually with an estimated cost of \$10,000 per test. The 2015 estimates for these estimates decreased proportionally with the number of sources.

ethylene testing is required once every 5 years with an estimated cost of \$10,000 per test at 2 facilities, and this ICR assumes these estimates decreased

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
40 CFR Part 60, Subpart PPP				
Notification of construction/reconstruction	0.33	1	0	0.33
Notification of actual startup	0.33	1	0	0.33
Notification of physical or operational change	0	1	0	0
Notification of initial performance test	0.33	1.2	0	0.40
Semiannual Exceedance Report	32.33	2	0	64.67
40 CFR Part 63, Subpart NNN				
Excess or No Excess Emissions Reports	5	2	0	10
			Total (rounded)	76

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	1	37	0	0
2	0	38	0	0
3	0	38	0	0
Average	0.33	37.67	0	0

^a New respondents include sources with constructed and reconstructed affected facilities. We anticipate 1 additional new o becoming subject to the rule in the next three years (an average of 0.33 new respondents per year).

(E)
Number of Respondents (E=A+B+C-D)
38
38
38
38

or reconstructed source