

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart RRRRRR, SSSSSS, and TTTTTT) (Renewal), EPA ICR Number 2274.07, OMB Control Number 2060-0606.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) were proposed on September 20, 2007; and promulgated on December 26, 2007. These regulations apply to the following both existing and new facilities: 1) clay ceramics manufacturing facilities that process more than 50 tons per year of wet clay and are area sources of hazardous air pollutants (HAP); 2) glass manufacturing facilities that use continuous furnaces to produce glass that contains HAP as raw materials and are area sources of HAP; and 3) secondary nonferrous metals processing facilities that are area sources of HAP. Clay ceramics manufacturing facilities include facilities that manufacture pressed tile, sanitaryware, dinnerware, or pottery with an atomized glaze spray booth or kiln that fires glazed ceramic ware. Glass manufacturing facilities include facilities that manufacture flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials to produce molten glass and form the molten glass into sheets, containers, or other shapes. Secondary nonferrous metals processing facilities means brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plants that use furnace melting operations to melt post-consumer nonferrous metal scrap to make products including the following: bars, ingots, blocks, or metal powders. New facilities include those that commenced either construction, or modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT.

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's regional offices can review them. All other reports are sent to either 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 and operators of clay ceramics manufacturing facilities, glass manufacturing facilities, and secondary nonferrous metals processing facilities that are area sources of HAP. There are approximately 55 clay ceramics manufacturing facilities, 21 glass manufacturing facilities, and 10 secondary nonferrous metals processing facilities, which are owned and operated by the clay ceramics, glass manufacturing, and nonferrous metals processing industries, respectively. The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal). None of the 86 facilities in the United States are owned by either state, or 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 is an average of one affected facility at each clay ceramics plant site, one affected facility at each secondary nonferrous metals processing plant site, and 1.3 affected facilities (continuous furnaces) at each glass manufacturing plant site. Each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 55 clay ceramics manufacturing facilities, 21 glass manufacturing facilities and 10 secondary nonferrous metals processing per year will be subject to these standards, and one additional clay ceramics facility will become subject to these same standards during the three-year period of this ICR (overall total of 87 respondents).

The active (previous) ICR had the following Terms of Clearance (TOC):

“Upon resubmission, the agency must update the burden estimates to accurately reflect the number of respondents in industry and verify that there are no reporting or recordkeeping requirements for States in 40 CFR Part 63, Subparts RRRRRR, SSSSSS,

and TTTTTT. The agency must also ensure that burden is calculated for all of the requirements and that the requirements and burden tables are consistent throughout the supporting statement. The agency must provide screen shots of the electronic mode of collection that is used for this information collection. In addition, the agency must have a burden statement that aligns with the requirements under 5 CFR 1320.8(b)(3) and placement of the OMB control number for on-line submissions on the initial screen per 5 CFR 1320.3(f)(2).”

In renewing the currently-approved ICR, the agency has reviewed the number of respondents in industry and updated the burden estimates accordingly. In this case, we identified three closed facilities and eight new sources based on changes within the industry. There are no reporting requirements for states. ‘Burden’ has been calculated for all requirements, which are reflected in the burden tables in the attached supporting statement. All electronic collection in this information collection is submitted through EPA's CEDRI or ERT, as discussed in section 4(b)(i) of this document. Additional Paperwork Reduction Act requirements for CEDRI and ERT, including the burden statement and OMB control number, are available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

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 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 from clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals processing area 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 these source categories at 40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT.

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 the standards are used to inform the Agency or 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 the standards are being met. The performance test may also be observed.

Sources subject to 40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT are not required to submit regular reports, but only initial notifications and notifications of compliance status.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT.

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* (87 FR 43843) on July 22, 2022. 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 87 respondents (56 clay ceramics manufacturing facilities, 21 glass manufacturing facilities, and 10 secondary nonferrous metals processing facilities) will be subject to these same 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: 1) the Tile Council of North America, at (864) 646-8453; 2) the Glass Manufacturing Industry Council, at (614) 523-3033; and 3) the American Foundry Society, at (847) 824-0181.

An industry representative from Tile Council of North America provided comments on the number of respondents for clay manufacturing. Based on this response and the results of permit searches and searches of EPA's ECHO database, we removed three closed facilities and added eight additional tile manufacturing facilities to the clay manufacturing respondent count. The response from Tile Council of North America also indicated that some facilities on their facility list may be closed. Therefore, we did not include additional facilities where we were unable to confirm applicability to 40 CFR Part 63, Subpart RRRRRR.

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 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 or operators of clay ceramics manufacturing, glass manufacturing, and secondary nonferrous metals

processing area sources. The United States Standard Industrial Classification (SIC) codes for the respondents affected by these standards and their corresponding North American Industry Classification System (NAICS) codes, are found in the following table:

Standard	SIC Codes	NAICS Codes
40 CFR Part 63, Subpart RRRRRR	SIC Codes	NAICS Codes
Pottery, Ceramics, and Plumbing Fixture Manufacturing	3261, 3262, 3263, 3264, 3269, 3299, 5719	327110
Clay Building Material and Refractories Manufacturing	3251, 3253, 3255, 3259, 3297	327120
40 CFR Part 63 Subpart SSSSSS	SIC Codes	NAICS Codes
Flat Glass Manufacturing	3211	327211
Other Pressed and Blown Glass and Glassware Manufacturing	3229	327212
Glass Container Manufacturing	3221	327213
40 CFR Part 63 Subpart TTTTTT	SIC Codes	NAICS Codes
Secondary Smelting, Refining and Alloying of Nonferrous Metal (except Copper and Aluminum)	3341, 3399	331492
Copper Rolling, Drawing, Extruding, and Alloying	3341, 3351, 3357, 3399	331420

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart RRRRRR, SSSSSS, and TTTTTT) (Renewal).

A source must make the following reports:

Notifications	
40 CFR Part 63, Subpart RRRRRR	
Initial notification	§63.11441(a), §63.9(b)(2)
Notification of applicability	§63.9(a)

Notifications	
Notification of construction/reconstruction	§63.9(b)(5)
Request for extension of compliance	§63.9(c)
Notification of special compliance requirements	§63.9(d)
Notification of compliance status	§63.11441(b), §63.9(h)
Notification of changes in information	§63.9(j)
40 CFR Part 63, Subpart SSSSSS	
Initial notification	§63.11456(a), §63.9(b)
Notification of applicability	§63.9(a)
Notification of construction/reconstruction	§63.9(b)(5)
Request for extension of compliance	§63.9(c)
Notification of special compliance requirements	§63.9(d)
Notification of compliance status	§63.11456(b), §63.9(h)
Notification of changes in information	§63.9(j)
40 CFR Part 63, Subpart TTTTTT	
Initial notification	§63.11469(a), §63.9(b)(2)
Notification of applicability	§63.9(a)
Notification of construction/reconstruction	§63.9(b)(5)
Request for extension of compliance	§63.9(c)
Notification of special compliance requirements	§63.9(d)
Notification of compliance status	§63.11469(b), §63.9(h)
Notification of compliance status and performance test results	§63.11469(c), §63.11469(d)
Notification of changes in information	§63.9(j)

Reports	
40 CFR Part 63, Subpart RRRRRR	
Subpart RRRRRR does not have reporting requirements	
40 CFR Part 63, Subpart SSSSSS	
Bag leak detection system monitoring plan	§63.11453(c)(2)
Other control device monitoring plan	§63.11453(e)
Initial performance tests	§63.7(e)(1)
Quality assurance test plan	§63.7(c)
40 CFR Part 63, Subpart TTTTTT	

Reports	
Bag leak detection system monitoring plan	§63.11468(c)(2)
Initial performance tests	§63.7(e)(1)
Quality assurance test plan	§63.7(c)

A source must keep the following records:

Recordkeeping	
40 CFR Part 63, Subpart RRRRRR	
Records of notifications	§63.11442(a)(1), §63.10(b)(2)(xiv)
Records of measurements needed to document compliance with management practices, including records of monitoring and inspection data	§63.11440(d), §63.11442(a)(2), §63.10(b)(2)(vii)
Keep records for five years	§63.11442(c), §63.10(b)(1)
40 CFR Part 63, Subpart SSSSSS	
Records of notifications	§63.11457(a)(1), §63.10(b)(2)(xiv)
Records of startups, shutdowns and malfunctions	§63.10(b)(2)
Records that demonstrate continuous compliance	§63.11457(a)(3)
Records of glass production	§63.11457(a)(4)
Monitoring/inspection information	§§63.11457(a)(5)-(8), §63.11457(c)
Performance test plan	§63.7(c)(2)
CMS quality control plan	§63.8(d)
All required CMS measurements	§63.10(c)(1)
Periods of excess emissions	§§63.10(c)(7)-(8)
Keep records for five years	§63.11457(d), §63.10(b)(1)
40 CFR Part 63, Subpart TTTTTT	
Records of notifications	§63.11470(a)(1), §63.10(b)(2)(xiv)
Monitoring/inspection information	§63.11470(a)(2)
Performance test plan	§63.7(c)(2)
Keep records for five years	§63.11470(c), §63.10(b)(1)

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. There are no electronic reporting requirements associated with these subparts.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate COMS for opacity, or CPMS for temperature, pressure drop, water flow, and/or liquid supply pressure for fabric filters, baghouses, wet scrubbers, or wet control systems, or CPMS for monitoring voltage and current for ESPs.
Perform initial performance test, Reference Method 1 or 1A; 2, 2A, 2C, 2F, or 2G; 3, 3A, or 3B; 4; 5 or 17; 22, and/or 29 tests, 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 these 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.

Information contained in the reports is reported by both 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

The majority of the respondents are large entities (i.e., large businesses). However, 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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart RRRRRR, SSSSSS, and TTTTTT) (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 each of the subparts 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 1,970 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	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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

For clay ceramics manufacturing area sources and for secondary nonferrous metals processing area sources, there are no capital/startup or operation and maintenance costs. The only costs to the regulated industry resulting from information collection activities required by

the subject standards are labor costs. For glass manufacturing area sources, the type of industry costs associated with the information collection activities in these subject standards 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 monitors and other costs, such as photocopying and postage.

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

For both clay ceramics manufacturing facilities and secondary nonferrous metals processing facilities, 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 for these two categories of manufacturing facilities. However, for glass manufacturing, the capital/startup and operation and maintenance costs are summarized below in the following table:

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost ^a (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M (E X F)
Performance Tests	\$8,740	0	\$0	\$0	0	\$0
Monitoring Equipment	\$5,603	0	\$0	\$0	0	\$0
File Cabinets	\$235	0	\$0	\$0	0	\$0
Inspection of Emission Control Systems ^b	\$0	0	\$0	\$992	14	\$13,888
Total ^c			\$0			\$13,900

^a All existing sources have fully implemented capital costs to comply with the current standards, and we assume the new clay manufacturing facility will use the compliant material option. Therefore, no additional capital/startup costs are expected.

^b We estimate 21 glass manufacturing facilities with 27 affected furnaces. We assume that 13 of the 27 furnaces can meet the emission limit without installation of a control device. We assume that each of the remaining 14 affected furnaces have automated monitoring and recording systems. We assume that annual inspections of emission control systems will require 8 hours per inspection at the current labor rate for technical personnel (\$123.94/hr) for each of the 14 affected furnaces with a control device (\$123.94 x 8 = \$992 (rounded)).

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$13,900. This is the total of column G.

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 \$13,900. These are the record-keeping 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 \$117.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34 (GS-6, Step 3, \$17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 55 existing respondents will be subject to the clay ceramics manufacturing area source standards; 21 existing respondents will be subject to the glass manufacturing area source standard; and 10 existing respondents will be subject to the secondary nonferrous metals processing area source standard. It is estimated that one additional clay manufacturing facility will become subject to these same standards over the three-year period of this ICR. The overall average number of respondents, as shown in the table below, is 87 per year (56 for clay ceramics manufacturing area sources, 21 for glass manufacturing area sources, and 10 for secondary nonferrous metals processing area sources).

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		
	(A)	(B)	(C)	(D)	(E)
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	Number of Respondents (E=A+B+C-D)
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)					
1	1	55	0	0	56
2	0	56	0	0	56
3	0	56	0	0	56
Average	0.33	56	0	0	56
Glass Manufacturing Area Sources (Subpart SSSSSS)					
1	0	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)					
1	0	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10
Average Total	0.33	87	0	0	87

^a 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 87.

The total number of annual responses per year is calculated using the following table:

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=(BxC)+D
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)				
Initial notification of applicability ^c	0.33	1	0	0.33
Notification of compliance status ^d	0.33	1	0	0.33
Keeps Records	0	0	N/A ^a	0
Total				0.67
Glass Manufacturing Area Sources (Subpart SSSSSS)				
Keeps Records	0	0	14 ^b	14
Total				14
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)				
Keeps Records	0	0	N/A ^a	0
Total				0
		Total Responses for All Area Sources (rounded) ^e		15

^a No responses are required for this activity after the first three years

^b We estimate 21 glass manufacturing facilities with 27 affected furnaces. Of these, 14 furnaces have automatic monitoring and recording systems.

^c We assume 1 new facility will submit an Initial Notification during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year).

^d We assume 1 new facility will submit a Notification of Compliance Status during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year).

^e Total of 14.67 is rounded to 15 responses per year.

The number of Total Annual Responses is 15.

The total annual labor costs are \$236,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (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 1,970 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart RRRRRR, SSSSSS, and TTTT) (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 131 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$13,900. 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 230 labor hours at a cost of \$117; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing Area Sources (40 CFR Part 63, Subpart RRRRRR, SSSSSS, and TTTT) (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 an adjustment. The adjustment increase is due to an increase in the number of respondents, including one new respondent expected during the three-year period of this ICR. There is an increase in cost due to the increased number of respondents and due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2021) to calculate respondent burden costs.

The new source is not expected to incur capital costs; therefore, there is no change in the capital/startup costs from the most-recently approved ICR. There is an increase in O&M costs due to the use of updated labor rates associated with inspections of emission control systems

for glass manufacturing facilities. This ICR uses the technical labor rate from the most-recent Bureau of Labor Statistics report (September 2021) to calculate respondent burden costs associated with inspection of emission control systems.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 131 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, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2022-0040. 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-2022-0040 and OMB Control Number 2060-0606 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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Reporting Requirements								
A. Familiarize with regulatory requirements ^a	2	1	2	87	174	8.7	17.4	\$24,018.53
B. Required activities								
Initial notification of applicability ^c	2	1	2	0.33	0.67	0.03	0.07	\$92
Notification of compliance status ^d	4	1	4	0.33	1.33	0.07	0.13	\$184
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Subtotal for Reporting Requirements						202		\$24,295
5. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Record notifications and data ^e	0.1	1,095	109.5	14	1,533	76.65	153.3	\$211,611.49
E. Time to transmit or disclose information ^f	0.25	3.3	0.83	0.33	0.28	0.01	0.03	\$38
F. Time to train personnel ^g	12	1	12	0.33	4	0.2	0.4	\$552

G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,768		\$212,202
Total Labor Burden and Cost (rounded) ^h						1,970		\$236,000
Total Capital and O&M Cost (rounded) ^h								\$13,900
GRAND TOTAL (rounded) ^h								\$250,000

Assumptions:

^a There are an estimated 21 existing glass manufacturing facilities, 55 existing clay manufacturing facilities, and 10 existing secondary nonferrous metals processing facilities that use HAP metals. One new clay manufacturing facility is expected during the three-year period of this ICR (1 facility/3 years = average of 0.33 new facilities per year). We assume all 87 facilities will have to familiarize with the regulatory requirements each year.

^b These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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.

^c We assume 1 new facility will submit an initial notification during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year).

^d We assume 1 new facility will submit a notification of compliance during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year). Notifications of Compliance Status.

^e We estimate 21 glass manufacturing facilities with 27 affected furnaces. It is assumed that 13 of the 27 affected furnaces can meet the emission limit without installation of a control device. It is assumed that each of the remaining 14 affected furnaces have automatic monitoring and recording systems and would be required to record data. It is assumed that the data from these systems is recorded 3 times per day. (3 x 365 = 1,095). Existing permit requirements already require clay ceramics manufacturing and secondary nonferrous metals processing facilities to collect data. We assume the permit for the new facility will require the facility to collect data. Therefore, there are no costs or burden associated with these information collection activities for clay ceramics manufacturing and secondary nonferrous metals processing.

^f We assume one new facility will submit the Initial Notification and Notification of Compliance Status during the three-year period of this ICR (1 facility/3 years = average of 0.33 facilities per year)

^g We assume one new facility will need to train employees during the three-year period of this ICR (1 facility/3 years = average of 0.33 facilities per year).

^h 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 Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing (40 CFR Part 63, Subparts RRRRRR, SSSSSS, and TTTTTT) (Renewal)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year	(E) Technica l Hours per Year (E=CxD)	(F) Managemen t Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year ^a
Attend performance test ^b	16	1	16	0	0	0	0	\$0
Report review:								
Initial notification of applicability ^c	2	1	2	0.33	0.67	0.03	0.07	\$39
Notification of performance test ^d	1	1	1	0	0	0	0	\$0
Notification of compliance status ^e	4	1	4	0.33	1.33	0.07	0.13	\$78
Travel expenses for tests attended ^f				0				\$0
TOTAL (rounded) ^g						2.30		\$117

Assumptions:

^a These rates are from the Office of Personnel Management (OPM), 2022 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. 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 \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

^b This testing requirement is the initial testing requirement and is applicable only to glass manufacturing area sources. We assume all glass manufacturing sources have fulfilled the initial testing requirement. There is no repeat testing requirement.

^c We assume 1 new facility will submit an initial notification during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year).

^d Not required for existing facilities or the new clay manufacturing facility.

^e We assume 1 new facility will submit a Notification of Compliance Status during the three-year period of this ICR (1 facility/3 years = 0.33 average facilities per year).

^f Assumes Agency personnel (1 person) will spend 2 days per plant, at \$50 per diem per day, and \$400 transportation expense per round trip to attend performance tests.

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