

### ICR Summary Information

Hours per Response	131
Number of Respondents	87
Total Estimated Burden Hours	1,970
Total Estimated Costs	\$250,000
Annualized Capital O&M	\$13,900
Total Annual Responses	15
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing, Glass Manufa 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 <sup>a</sup>	(E) Technical Hours per Year (E=CxD)
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 <sup>a</sup>	2	1	2	87	174
B. Required activities					
Initial notification of applicability <sup>c</sup>	2	1	2	0.33	0.67
Notification of compliance status <sup>d</sup>	4	1	4	0.33	1.33
C. Create information	See 4B				
D. Gather existing information	See 4B				
E. Write report	See 4B				
<b>Subtotal for Reporting Requirements</b>					
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 <sup>e</sup>	0.1	1,095	109.5	14	1,533
E. Time to transmit or disclose information <sup>f</sup>	0.25	3.3	0.83	0.33	0.28
F. Time to train personnel <sup>g</sup>	12	1	12	0.33	4
G. Time for audits	N/A				
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Cost (rounded) <sup>h</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>h</sup></b>					
<b>GRAND TOTAL (rounded) <sup>h</sup></b>					

**Assumptions:**

<sup>a</sup> There are an estimated 21 existing glass manufacturing facilities, 55 existing clay manufacturing facilities, and 10 existing se facilities that use HAP metals. One new clay manufacturing facility is expected during the three-year period of this ICR (1 faci per year). We assume all 87 facilities will have to familiarize with the regulatory requirements each year.

<sup>b</sup> These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Civilian 1 group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for varyi overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hi

<sup>c</sup> We assume 1 new facility will submit an initial notification during the three-year period of this ICR (1 facility/3 years = 0.33

<sup>d</sup> We assume 1 new facility will submit a notification of compliance during the three-year period of this ICR (1 facility/3 years

<sup>e</sup> We estimate 21 glass manufacturing facilities with 27 affected furnaces. It is assumed that 13 of the 27 affected furnaces can use a control device. It is assumed that each of the remaining 14 affected furnaces have automatic monitoring and recording system assumed that the data from these systems is recorded 3 times per day. ( $3 \times 365 = 1,095$ ). Existing permit requirements already require secondary nonferrous metals processing facilities to collect data. We assume the permit for the new facility will require the facility to incur the costs or burden associated with these information collection activities for clay ceramics manufacturing and secondary nonferrous metals processing.

<sup>f</sup> We assume one new facility will submit the Initial Notification and Notification of Compliance Status during the three-year period of this ICR (of 0.33 facilities per year).

<sup>g</sup> 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).

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

cturing, and Secondary Nonferrous

(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year <sup>b</sup>
8.7	17.4	\$24,018.53
0.03	0.07	\$92
0.07	0.13	\$184
<b>202</b>		<b>\$24,295</b>
76.65	153.3	\$211,611.49
0.01	0.03	\$38
0.2	0.4	\$552
<b>1,768</b>		<b>\$212,202</b>
<b>1,970</b>		<b>\$236,000</b>
		<b>\$13,900</b>
		<b>\$250,000</b>

Labor Rates:	
Management	\$156.91
Technical	\$123.94
Clerical	\$62.52

1,970 total labor hours  
 15 # responses  
 131 hr/response

condary nonferrous metals processing  
 lity/3 years = average of 0.33 new facilities

Workers, by occupational and industry  
 ing industry wage rates and the additional  
 ring, training, and equipping their employees.

average facilities per year).  
 = 0.33 average facilities per year).

meet the emission limit without installation of controls and would be required to record data. It is required for clay ceramics manufacturing and metal finishing. Therefore, there are no facilities for metals processing.

period of this ICR (1 facility/3 years = average

rate of 0.33 facilities per year).

**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) (I**

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) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)
Attend performance test <sup>b</sup>	16	1	16	0	0	0
Report review:						
Initial notification of applicability <sup>c</sup>	2	1	2	0.33	0.67	0.03
Notification of performance test <sup>d</sup>	1	1	1	0	0	0
Notification of compliance status <sup>e</sup>	4	1	4	0.33	1.33	0.07
Travel expenses for tests attended <sup>f</sup>				0		
<b>TOTAL (rounded) <sup>g</sup></b>						<b>2.30</b>

**Assumptions:**

<sup>a</sup> These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of been increased by 60 percent to account for the benefit packages available to government employees. This cost is based on the which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$70 (\$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 + from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

<sup>b</sup> This testing requirement is the initial testing requirement and is applicable only to glass manufacturing area sources. We a manufacturing sources have fulfilled the initial testing requirement. There is no repeat testing requirement.

<sup>c</sup> We assume 1 new facility will submit an initial notification during the three-year period of this ICR (1 facility/3 years = 0. year).

<sup>d</sup> Not required for existing facilities or the new clay manufacturing facility.

<sup>e</sup> We assume 1 new facility will submit a Notification of Compliance Status during the three-year period of this ICR (1 facility average facilities per year).

<sup>f</sup> Assumes Agency personnel (1 person) will spend 2 days per plant, at \$50 per diem per day, and \$400 transportation expenses attend performance tests.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Manufacturing, and  
Renewal)

(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year <sup>a</sup>
0	\$0
0.07	\$39
0	\$0
0.13	\$78
	\$0
	<b>\$117</b>

Labor Rates:	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

f pay. The rates have  
e following labor rates  
0.56 (GS-13, Step 5,  
· 60%). These rates are

assume all glass

33 average facilities per

ity/3 years = 0.33

se per round trip to

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost <sup>a</sup> (B X C)	Annual O&M Costs for One Respondent
Performance Tests	\$8,740	0	\$0	\$0
Monitoring Equipment	\$5,603	0	\$0	\$0
File Cabinets	\$235	0	\$0	\$0
Inspection of Emission Control Systems <sup>b</sup>	\$0	0	\$0	\$992
Total <sup>c</sup>			\$0	

<sup>a</sup> All existing sources have fully implemented capital costs to comply with the current standards, and we assume the most compliant material option. Therefore, no additional capital/start-up costs are expected.

<sup>b</sup> We estimate 21 glass manufacturing facilities with 27 affected furnaces. We assume that 13 of the 27 furnaces can use a control device. We assume that each of the remaining 14 affected furnaces have automated monitoring and recording inspections of emission control systems will require 8 hours per inspection at the current labor rate for technical personnel with a control device (\$123.94 x 8 = \$992 (rounded)).

<sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



<b>Costs</b>	
(F)	(G)
Number of Respondents with O&M	Total O&M (E X F)
0	\$0
0	\$0
0	\$0
14	\$13,888
	\$13,900

new clay manufacturing facility will use the

meet the emission limit without installation of bag systems. We assume that annual tonnage of emissions is 100 tons per year at a cost of \$123.94/ton for each of the 14 affected

<b>Number of Respondents</b>				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents <sup>a</sup>	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
<b>Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)</b>				
1	1	55	0	0
2	0	56	0	0
3	0	56	0	0
Average	0.33	56	0	0
<b>Glass Manufacturing Area Sources (Subpart SSSSSS)</b>				
1	0	21	0	0
2	0	21	0	0
3	0	21	0	0
Average	0	21	0	0
<b>Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)</b>				
1	0	10	0	0
2	0	10	0	0
3	0	10	0	0
Average	0	10	0	0
Average Total	0.33	87	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
56
56
56
56
21
21
21
21
10
10
10
10
87

<b>Total Annual Responses</b>			
(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Clay Ceramics Manufacturing Area Sources (Subpart RRRRRR)			
Initial notification of applicability <sup>c</sup>	0.33	1	0
Notification of compliance status <sup>d</sup>	0.33	1	0
Keeps Records	0	0	N/A <sup>a</sup>
Total			
Glass Manufacturing Area Sources (Subpart SSSSSS)			
Keeps Records	0	0	14 <sup>b</sup>
Total			
Secondary Nonferrous Metals Processing Area Sources (Subpart TTTTTT)			
Keeps Records	0	0	N/A <sup>a</sup>
Total			
		Total Responses for All Area Sources (rounded) <sup>e</sup>	

<sup>a</sup> No responses are required for this activity after the first three years

<sup>b</sup> We estimate 21 glass manufacturing facilities with 27 affected furnaces. Of these, 14 furnaces have automatic n

<sup>c</sup> We assume 1 new facility will submit an Initial Notification during the three-year period of this ICR (1 facility, facilities per year).

<sup>d</sup> We assume 1 new facility will submit a Notification of Compliance Status during the three-year period of this I (0.33 average facilities per year).

<sup>e</sup> Total of 14.67 is rounded to 15 responses per year.

(E)
Total Annual Responses E=(BxC)+D
0.33
0.33
0
0.67
14
14
0
0
15

Monitoring and recording systems.

1/3 years = 0.33 average

ICR (1 facility/3 years =