

ICR Summary Information

Hours per Response	221
Number of Respondents	41
Total Estimated Burden Hours	17,700
Total Estimated Costs	\$2,150,000
Annualized Capital O&M	\$18,600
Total Annual Responses	80
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBI

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements ^c	1	1	1	41
B. Required activities ^d				
Initial performance test ^e	240	5	1,200	0
Repeat initial performance test ^e	240	1	240	0
Monitoring of VOC emissions and operations ^f	1	350	350	41
Monthly performance tests ^{f,k}	2	12	24	0
C. Create information	See 3B			
D. Gather existing information	See 3E			
E. Write report				
Notification of actual startup ^e	2	1	2	0
Notification of initial performance test ^e	2	1	2	0
Initial performance test results ^e	2	1	2	0
Notification of Method 25A test ^g	4	1	4	3
Notification of construction/reconstruction	2	1	2	0
Report of physical operational changes ^h	4	2	8	4.1
Report of spray materials/formulation change ^{h,i}	4	2	8	4.1
Semiannual reports ^j	10	2	20	13.67
Annual report of formulation data/Method 24 Results ^k	4	1	4	41
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarize with regulatory 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 ^l				
Record of startup, shutdown, and malfunction	0.5	25	12.5	41
Records of monthly performance test	See 3B			
Records of emissions and operations	See 3B			
F. Time to train personnel	N/A			
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ^m				
TOTAL CAPITAL AND O&M COST (rounded) ^m				
GRAND TOTAL (rounded) ^m				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources, one of v sources over the three-year period of this ICR. In addition, we have not included the reporting requirements burden for affected sources because their occurrence is very rare in practice.
- ^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Clerical \$75.05. The Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry group" have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of other expenses associated with hiring, training, and equipping their employees.
- ^c We have assumed all existing sources will have to re-familiarize with the regulatory requirements each year.
- ^d We have assumed that the rubber tire manufacturing plants will not construct or reconstruct an affected facility, however, the operations.
- ^e We have assumed that there will be no new sources expected over the three-year period of this ICR.
- ^f Sources are required to monitor and record monthly performance tests, VOC use, the number of days in each compliance per Method 24 test analysis conducted to verify the VOC content of the spray, monitoring device data and other operational data so that they will operate approximately 350 days per year or 50 weeks. We have further assumed that the burden incurred to record these items is one hour per occurrence.
- ^g We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine the efficiency of both entering and leaving the control device.
- ^h We have assumed that 10 percent of the existing rubber tire manufacturing plants subject to this rule will make a physical/operational change.
- ⁱ A source is required to do Method 24 test or formulation data analysis if the operational change involves spray materials from a different source.
- ^j We have assumed that one-third of the sources will submit exceedance reports for each six month period.
- ^k We have assumed that all existing sources, will submit an annual Method 24 test report or an annual formulation data report for each spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sources (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing to add on control devices. The remaining sources will perform monthly performance tests. We have assumed that the burden incurred to record these items is one hour per occurrence for intermittent use.
- ^l We have assumed that there will be two occurrences of startup, shutdown, and/or malfunction per source every four weeks, v respondent in 50 weeks.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

3) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Management person- hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total cost per year ^b
41	2.05	4.1	\$5,661.03
0	0	0	0
0	0	0	\$0.00
14,350	717.5	1,435	\$1,981,361.18
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
12	0.6	1.2	\$1,656.89
0	0	0	0
32.8	1.64	3.28	\$4,528.83
32.8	1.64	3.28	\$4,528.83
273.4	13.67	27.34	\$37,749.42
164	8.2	16.4	\$22,644.13
17,142			\$2,058,130
512.5	25.63	51.25	\$70,762.90
589			\$70,763
17,700			\$2,130,000
			\$18,600
			\$2,150,000

Labor Rates	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

responses hr/response
80 221.25

which mixes only rubber compound. There will be no additional
d facilities exemptions under 40 CFR 60.676(d) in the table because

erical \$62.52 (\$29.77 + 110%). These rates are from the United States
roup.” The rates are from column 1, “Total compensation.” The rates
nploying workers beyond their wages and benefits, including business

ey will conduct operational changes on 10 percent of the affected

iod, control device efficiency, formulation data or the results of
uch as the number of tires processed. We have assumed that sources
tems is one hour per occurrence.

ie VOC concentration in each stack (source using a capture system)

erational change by adding a green tire spray booth or a new line.
nulation changes, and results should be reported within 30 days.

to verify the VOC content of each tread end cement and green tire
ces, will continue to use hazardous air pollutant (HAP) materials
aining plants will use only water-based sprays and are not required to
ce per source due to the nature of the control equipment used and its

which will yield and average of 25 occurrences per source per

Table 2: Average Annual EPA Burden - NSPS for Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB) (Ren

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a
Notification of actual startup ^c	2	1	2	0
Notification of initial performance test ^c	2	1	2	0
Report of performance test results ^c	2	1	2	0
Notification of construction/reconstruction ^c	2	1	2	0
Notification of Method 25A test ^d	8	1	8	3
Notification of change in spray materials formulation ^e	2	1	2	4.1
Semiannual reports ^f	4	2	8	13.67
Annual report of formulation data/Method 24 test results ^g	5	1	5	41
Report of physical/operational changes ^h	4	1	4	4.1
TOTAL LABOR BURDEN AND COST (rounded) ⁱ				

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 41 existing sources one of sources over the three-year period of this ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technica Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 p Personnel Management (OPM), 2022 General Schedule, which excludes locality, rates of pay. The rates have been increased government employees.

^c We have assumed that there will be no new sources expected over the three-year period of this ICR.

^d We have assumed that three existing sources using control devices will conduct a Method 25 test once a year to determine t both enter and leaving the control device.

^e We have assumed that a source is required to do Method 24 or formulation data analysis if the operational change involves within 30 days.

^f We have assumed that one-third of sources will submit exceedance reports for each six month period.

^g We have assumed that all existing sources will submit an annual Method 24 test report or an annual formulation data report spray material in lieu of conducting a monthly performance test. We have further assumed that 50 percent of the existing sou that meet the green tire VOC limitations in NSPS not needing any add on control devices. The remaining plants use only wat We have assumed that the burden incurred to record these items is five hours per occurrence per source due to the nature of t

^h We have assumed that ten percent of the existing rubber tire manufacturing plants subject to the rule will make a physical/o line.

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

ewal)

(E) Technical person- hours per year (E=CxD)	(F) Managem ent person- hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Total cost per year ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
24	1.2	2.4	\$1,410
8.2	0.41	0.82	\$482
109.36	5.47	10.94	\$6,423
205	10.25	20.5	\$12,040
16.4	0.82	1.64	\$963
417			\$21,300

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

which mixes only rubber compound. There will be no additional

l \$52.37 (GS-12, Step 1, \$32.73 + 60%); and Clerical \$28.34 (GS-6, percent of Technical hours. These rates are from the Office of by 60 percent to account for the benefit packages available to

the VOC concentration in each stack (source using a capture system)

spray materials formulation changes and results should be reported

to verify the VOC content of each tread end cement and green tire rces will continue to use HAP materials (VOC) in the spray at levels ter-based sprays and are not required to do monthly performance tests. he control equipment used and its intermittent use.

operational change due to adding a green tire spray booth or a new

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C) ^b	Annual O&M Costs for One Respondent	Number of Respondents with O&M
VOC (organics) monitor ^{1,3}	\$39,716	0	\$0	\$8,511	0
Temperature monitors at thermal and catalytic incinerators ^{1,3}	\$8,511	0	\$0	\$4,539	4.1
Total ²			\$0		

¹ We assume no facilities are using an organics monitor or carbon absorber at this time. An estimated 10 percent of

² Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

³ Capital and O&M costs have been increased from 2007 to 2020 \$ using the CEPCI Equipment Cost Index.

C/S and O&M

(G) Total O&M, (E X F) ^b
\$0
\$18,610
\$18,600

respondents use a temperature monitor.

\$18,600

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
Notification of Method 25A test	3	1	0	3
Report of physical/operational changes	4.1	1	0	4.1
Notification of change in spray materials formulation	4.1	1	0	4.1
Semiannual report of excess emissions	13.67	2	0	27.34
Annual report of formulation data/Method 24	41	1	0	41
			TOTAL (rounded)	80

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
1	0	41	0	0
2	0	41	0	0
3	0	41	0	0
Average	0	41	0	0

¹New respondents include sources with constructed, reconstructed, and modified affected facili

(E) Number of Respondents (E=A+B+C+D)
41
41
41
41

ties