SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Boat Manufacturing

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV) (Renewal)

1(b) Short Characterization/Abstract

The NESHAP regulations published at 40 CFR part 63, subpart VVVV were proposed on July 14, 2000, and promulgated on August 22, 2001. This regulation applies to new or existing boat manufacturing facilities that are a major source of hazardous air pollutants (HAP). This regulation covers resin and gel coat operations at fiberglass boat manufacturers, paint and coating operations at aluminum boat manufacturers, and carpet and fabric adhesive operations at all boat manufacturers. Air toxics are released during application and curing from the resins, gel coats, adhesives, coating, and solvents used in boat manufacturing. This information is being collected to assure compliance with part 63, subpart VVVV.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators 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 sources subject to NESHAP.

Any owner or 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 are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The EPA expects that all but one respondent will choose to comply by limiting the HAP content of their fiberglass or aluminum boat manufacturing processes and operations. The one facility already has an add-on control device and will comply with the add-on control device standards. The EPA believes this facility will meet the monitoring and recordkeeping requirements. The respondents that will limit the HAP content to comply would monitor and record (in a spreadsheet) the monthly consumption of material and show the weighted-average HAP content over the past 12 months. However, if all the materials in an operation meet the HAP content limit, then each respondent would need only to record HAP content and would not need to track monthly consumption or record the computations.

For open molding operations at fiberglass boat manufacturing facilities, respondents

would also have the option of averaging among five different processes. Respondents would use options in the regulation to calculate actual and allowable emissions for the combined open molding operations. Compliance would be based on a 12 month rolling average.

Respondents who choose to use an enclosure and an add-on control device would submit a control device performance test report, including operating ranges for monitored parameters; and annual start-up, shutdown, and malfunction reports. Respondents would be required to monitor and keep records of specific operating parameters for each control device.

Based on our consultations with industry representatives, there is an average of 1.7 affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 144 facilities per year will be subject to the standard, with an additional five sources per year becoming subject to the standard.

A majority of the 144 manufacturing facilities are publicly owned and operated by the boat manufacturing industry. There is one facility that is owned and operated by the Federal Government (e.g., U.S. Marine). None of the 144 facilities in the United States are owned by state, local, or tribal Government. You can find the burden to the "Affected Public" listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV). The burden to the Agency to ensure compliance with the standard by both the publicly owned and operated facilities and the Federal Government facilities subject to the standard is listed in Table 2: Average Annual EPA Burden, NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV).

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or 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, pollutant emissions from boat manufacturing processes and operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart VVVV.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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 the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests 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 standard 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, that leaks are being detected and repaired, and the standard are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart VVVV.

3(a) Nonduplication

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 their own similar 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, no duplication exists.

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 (FR 58853) on October 5, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is anyway for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In estimating the affected number of sources and the growth rate of boat manufacturing facilities subject to this standard, EPA contacted Mr. John McKnight, at (202) 737-9757, from the National Marine Manufacturers Association (NMMA). We referenced the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the United States Census Bureau, the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. This information was used in conjunction with industry consultation to verify the number of sources and the industry growth rate. We also accessed a number of websites covering boat manufacturing and consulted with the EPA Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the standards. 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. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to 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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are boat manufacturing facilities. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) code could be found in the following table:

40 CFR part 63, subpart VVVV	SIC Codes	NAICS Codes
INDUSTRIAL		
Boat Building and Repairing (boat building)	3732	336612
Ship Building and Repairing	3731	336612
FEDERAL GOVERNMENT		
Federally owned facilities (e.g., Navy shipyards)	3732	336612
	3731	336612

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data is recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR part 63, subpart VVVV).

A source must make the following reports:

Notifications	
Initial notification for existing sources	63.9(b)(2)
Notification of intent to construct/reconstruct	63.9(b)(4)(i)
Notification of actual date of startup	63.9(b)(4)(v)
Request for extension of compliance	63.9(c)
Notification that source is subject to special compliance requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity and visible emission observations	63.9(f)
Notification for sources with continuous monitoring systems.	63.9(g)
Notification of compliance status	63.9(h)

Reports	
First compliance report	63.5764(b)(1)
Semiannual compliance report	63.5764(b)(3)
Start-up, shutdown, and malfunction plan	63.5764(e)

A source must keep the following records:

Recordkeeping	
Copy of each notification and report as submitted and associated documentation	63.5767(a)(b)
Record of weighted-average organic HAP content	63.5767(c)
Recordkeeping relevant to start-up, shutdown, and malfunction periods and continuous monitoring system performance evaluations	63.5767(d)
Records of monthly inspections and repairs	63.5755
Maintain records for 5 years	63.5764(b)

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.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 18, 25A and 311 test, and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply

with the emission standard, 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 or operator for five years.

5(c) Small Entity Flexibility

A majority of the affected facilities are primarily small entities (e.g., small businesses). However, the impact on small entities was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the type 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 business can use economics 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 in Table 1: Annual Industry Burden for NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV).

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 the subpart 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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or 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 26,327 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, 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

Managerial	$105.36	($50.17 + 110%)
Technical	$92.09	($43.85 + 110%)
Clerical	$47.25	($22.50 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2006, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only cost to the regulated industry resulting from information collection activities required by the subject standard is labor costs. There is no capital/startup costs required for the purchase or the installation of equipment, because respondents comply by employing pollution prevention measures. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

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

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous parameter monitors	N/A	N/A	N/A	$800	1	$800

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

The total operation and maintenance (O&M) costs for this ICR are $800. 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 $800.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 $138,370.

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

Managerial	$58.18	(GS-13, Step 5, $36.36 + 60%)
Technical	$43.17	(GS-12, Step 1, $26.98 + 60%)
Clerical	$23.36	(GS-6, Step 3, $14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV), below.

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 144 existing respondents will be subject to the standard. It is estimated that an additional five respondents per year will become subject. The overall average number of respondents, as shown in the table below is 144 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
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	5	134	0	0	139
2	5	139	0	0	144
3	5	144	0	0	149
Average	5	139	0	0	144

[1] New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 144.

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

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
Initial notification that existing sources are subject to the standard	134	1	n/a	134
Notification of intent to construct and application for approval of construction	5	1	n/a	5
Notification of start of construction	5	1	n/a	5
Notification of anticipated startup date	5	1	n/a	5
Notification of actual startup date	5	1	n/a	5
Notification of compliance status	5	1	n/a	5
Semiannual compliance reports of all sources	144	2	n/a	288
Quarterly compliance report	0	4	n/a	0
Annual compliance report	1	1	n/a	1
			Total	448

The number of Total Annual Responses is 448.

The total annual labor costs are $2,336,986. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV), below.

6(e) Bottom Line Burden Hours 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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are $2,336,986. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $800. 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 3,287 labor hours at a cost of $138,370. See Table 2. Annual Agency Burden and Cost: NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV), below.

6(f) Reasons for Change in Burden

The adjustment increase in burden from the most recently approved ICR is due to a shift from initial compliance to continuous compliance for the subject sources. There is also an increase of five additional new sources per year over the three years of this ICR. There is also an increase in the labor rates which contributed to an increase in the dollar cost burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or 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=s 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-OECA-2006-0724. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than 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), EPA West, Room 3334, 1301 Constitution Ave., N.W., 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone

number for the Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0724 and OMB Control Number 2060-0546 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 Boat Manufacturing (40 CFR part 63, subpart VVVV)

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Read instructions [c]	25	1	25	144	3,600	180	360	$367,498.80
4. Required activities for sources with add-on control devices [d]								
A. Initial performance test and report	410	1	410	0	0	0	0	$0
B. Establish operating parameters	See 4A							
C. Prepare startup, shutdown, and malfunction plan [e]	40	1	40	0	0	0	0	$0
5. Required activities for sources using pollution prevention measures [f]								
A. Develop recordkeeping system								
1) Fiberglass manufacturing operations [g]	22	1	22	4	88	4.4	8.8	$8,983.30
2) Adhesive operations [h]	1	1	1	5	5	0.25	0.5	$510.42
3) Aluminum coating operations [i]	6	1	6	1	6	0.3	0.6	$612.50
B. Enter information into recordkeeping system								
1) Fiberglass manufacturing operations [j]	84	1	84	128	10,752	537.6	1,075.2	$1,097,596.42
2) Adhesive operations [k]	12	1	12	144	1,728	86.4	172.8	$176,399.42
3) Aluminum coating operations [l]	22	1	22	16	352	17.6	35.2	$35,933.22
C. Work practice requirements	2	12	24	16	384	19.2	38.4	$39,199.87
6. Create information	See 5B							
7. Gather information	See 5B							
8. Notification requirements								
A. Initial notification that existing sources are subject to the standard [m]	24	1	24	134	3,216	160.8	321.6	$328,298.93
B. Notification for new major sources								

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
1) Intent to construct and application for approval of construction [n]	80	1	80	5	400	20	40	$40,833.20
2) Start of construction	2	1	2	5	10	0.5	1	$1,020.83
3) Anticipated startup date	2	1	2	5	10	0.5	1	$1,020.83
4) Actual startup date	2	1	2	5	10	0.5	1	$1,020.83
C. Request for compliance extension	N/A							
D. Notification of special compliance requirements	N/A							
E. Notification of performance tests	2	1	2	0	0	0	0	$0
F. Notification of compliance status [o]	4	1	4	5	20	1	2	$2,041.66
9. Reporting requirements								
A. Semiannual compliance reports for all Sources [p]	8	2	16	144	2,304	115.2	230.4	$235,199.23
B. Additional reports for sources with add-on control devices								
1) Quarterly compliance report for sources with exceedences	16	4	64	0	0	0	0	$0
2) Request to return to semiannual compliance reporting	8	1	8	1	8	0.4	0.8	$816.66
3) Control device performance test report	See 4A							
4) Operating range for monitored Parameters	See 4B							
5) Startup, shutdown, malfunction	8	1	8	0	0	0	0	$0
10. Recordkeeping requirements								
A. Read instructions	See 3							
B. Plan and develop record system	See 5A							
C. Record information	See 5B							
D. Records for area sources not subject to the standard	N/A							

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
11. Time to train personnel	N/A							
12. Time for audits	A/A							
Subtotals Labor Burden and cost					22,893	1,144.65	2,289.3	$2,336,986.12
TOTAL LABOR BURDEN AND COST (rounded)					26,327			$2,336,986

Assumptions:

[a] We have assumed that the average number of major sources that will be subject to the rule will be the 144 existing sources. There will be five additional new sources per year that will become subject to the rule over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $105.36 per hour for Executive, Administrative, and Managerial labor; $92.09 per hour for Technical labor, and $47.25 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2006, ATable 2. Civilian Workers, by occupational and industry group.@ The rates are from column 1, ATotal compensation.@ The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that it will take the same length of time (25 hours) for both fiberglass and aluminum boat manufacturers to review the rules for each facility.

[d] We have assumed that only one facility will be using an add-on control device, and will also be using the existing performance tests.

[e] We have assumed that the one facility using the add-on control device previously prepared a startup, shutdown, and malfunction plan.

[f] We have assumed that all other facilities are complying with the regulations using pollution prevention measures.

[g] We have assumed that 4 new respondents will take 22 hours each to develop the recordkeeping system for the fiberglass operations

[h] We have assumed that 5 new respondents will take 1 hour each to develop the recordkeeping system for the adhesive operations.

[i] We have assumed that 1 new respondent will take 6 hours each to develop the recordkeeping system for the aluminum coating operations.

[j] We have assumed that 128 respondents will take 84 hours each to enter information into the recordkeeping system for the fiberglass operations.

[k] We have assumed that 144 respondents will take 12 hours each to enter information into the recordkeeping system for the adhesive operations.

[l] We have assumed that 16 respondents will take 22 hours each to enter information into the recordkeeping system for the aluminum coating operations.

[m] We have assumed that 134 existing respondents will take 24 hours each to complete initial notification requirements.

[n] We have assumed that the five new respondents will take 80 hours to complete notification of intent to construct and application for approval of construction.

[o] We have assumed that 5 new respondents are required to complete notification of compliance status.

[p] We have assumed that 144 respondents are required to provide semiannual compliance reports.

[q] We have assumed that one respondent will request to return to annual compliance reporting.

Table 2: Average Annual EPA Burden - NESHAP for Boat Manufacturing (40 CFR part 63, subpart VVVV)

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
1. Read instructions	25	1	25	0	0	0	0	$0
2. Enter and update information into agency recordkeeping system [c]	4	1	4	144	576	28.8	57.6	$27,887.04
3. Notification review								
A. Review initial notification for existing sources [d]	2	1	2	134	268	13.4	26.8	$12,975.22
B. Notification for new major sources [e]								
1. Review intent to construct and application to construct	12	1	12	5	60	3	6	$2,904.90
2. Start of construction	2	1	2	5	10	0.5	1	$484.15
3. Anticipated startup date	2	1	2	5	10	0.5	1	$484.15
4. Actual startup date	2	1	2	5	10	0.5	1	$484.15
C. Review request for compliance extension	N/A							
D. Review special compliance requirements	N/A							
E. Review initial performance test and test plan	20	1	20	0	0	0	0	$0
F. Review compliance status [f]	2	1	2	134	268	13.4	26.8	$12,975.22
G. Area sources not subject to standard	N/A							
H. Review waiver application	N/A							
6. Reporting requirements								
A. Semiannual compliance reports for all Sources [g]	4	2	8	144	1,152	57.6	115.2	$55,774.08
B. Reports for sources with add-on control								

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
devices								
1. Quarterly compliance report for sources with exceedences [h]	4	4	16	29	464	23.2	46.4	$22,464.56
2. Request to return to semiannual compliance reporting [i]	4	2	8	2	16	0.8	1.6	$774.64
3. Review control device performance test report and operating range	20	1	20	1	20	1	2	$968.30
4. Review startup, shutdown malfunction reports [j]	4	1`	4	1	4	0.2	0.4	$193.66
Subtotals Labor Burden and cost					2,858	142.9	285.8	$138,370.07
TOTAL ANNUAL BURDEN AND COST (rounded)					3,287			$138,370

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to the rule will be the 144 existing sources. There will be five additional new sources per year that will become subject to the rule 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 government overhead expenses: Managerial rate of $58.18 (GS-13, Step 5, $36.36 x 1.6), Technical rate of $43.17 (GS-12, Step 1, $26.98 x 1.6), and Clerical rate of $23.36 (GS-6, Step 3, $14.60 x 1.6). These rates are from the Office of Personnel Management (OPM) A2007 General Schedule@ which excludes locality rates of pay.

[c] We have assumed that 144 respondent will take 4 hours each to enter and update information in the recordkeeping system.

d We have assumed that all existing sources will be in compliance in the third year.

[e] We have assumed that there will be five new sources per year.

[f] We have assumed that it will take two hours for each respondent to review the compliance status notification.

[g] We have assumed that each respondent will take four hours two times per year to review the semiannual compliance report.

[h] We have assumed that 20 percent of respondents will review the quarterly compliance exceedences report.

[i] We have assumed that two respondents will request to return to semiannual compliance reporting.

[j] We have assumed that one respondent will take four hours to review the startup, shutdown, malfunction report.