SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Automobile and Light-duty Truck Surface Coating

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR part 63, subpart IIII) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR part 63, subpart IIII were proposed on December 24, 2002 and promulgated on April 26, 2004.

These regulations apply to facilities that perform surface coating operations on automobiles and light-duty trucks. This information is being collected to assure compliance with 40 CFR part 63, subpart IIII.

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 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.

Based on our consultations with industry representatives, there is an average of one affected facility 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 65 respondents per year will be subject to the standard, and no additional respondents will become subject to the standard over the three-year period of this ICR.

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

The term, “Affected Public”, applies to private sector businesses or other for-profits that manufacture metal cans. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (attached). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Annual Agency Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (attached).

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 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, HAP emissions from automobile and light-duty truck surface coating operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NESHAP for this source category were promulgated at 40 CFR part 63, subpart IIII.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

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 and the standards 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.

The NESHAP also requires affected sources to submit a Notification of Compliance Status. This notification must be signed by a responsible company official who certifies its accuracy and certifies that the source has complied with the standards. The results of the performance test must be submitted to the EPA in the Notification of Compliance Status.

The NESHAP requires owners or operators to develop a startup, shutdown, and malfunction plan (SSMP), documenting procedures that will be taken in the case of any of these events. Other required submissions include startup, shutdown, and malfunction reports which demonstrate that the actions taken by an owner or operator during a startup, shutdown, or malfunction event comply with the SSMP. When actions taken are consistent with the plan, reports are required semiannually. When actions taken are inconsistent with the plan, immediate reports are required.

3. Nonduplication, Consultations, and Other Collection Criteria

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

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 its 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 (71 FR 58853) on October 5, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and

reporting provisions in the standard, is the AIRS Facility Subsystem (AFS) which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 65 respondents will be subject to the standard 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 the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice. In this case, no comments were received.

EPA solicited additional comments from Mary Turner of Daimler Chrysler at 243-512-1104 and Eric Anderson of Toyota at 859-746-4171 to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. These contacts provided no additional comments on the ICR.

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

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 the standards. EPA believes that the five year records retention requirement is consistent 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 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents of the recordkeeping and reporting requirements are owners or operators of metal can manufacturing operations.

Standard	SIC Code	NAICS Codes
40 CFR part 63, subpart IIII	3711	336111
		336112
		336211

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by 40 CFR part 63, subpart IIII.

A source must make the following reports:

Notifications	
Initial notification	63.3110(b), 63.5(d), 63.9(b)
Notification of compliance status	63.3110(c), 63.9(h)
Notification of construction or reconstruction	63.3110(a), 63.5
Notification of actual startup	63.3110(a), 63.9(b)
Notification of performance test	63.3110(a), 63.7(b), 63.8(e), 63.9(e)

Notification Reports	
Semiannual report	63.3120(a)

Notification Reports	
Excess emissions report	63.3120(a)(4-8)
Report of performance test	63.3120(b)
Startup, shutdown, malfunction report	63.3120(c)

A source must keep the following records:

Recordkeeping	
Five year retention of records	63.3131(b), 63.10(b)
Material formulation data	63.3130(b)
Records of HAP content calculations	63.3130(c)
Copies of notifications and reports	63.3130(a)
Records of names of materials used	63.3130(d)
HAP fractions in each material used	63.3130(e)
Density of materials used	63.3130(f)
Documentation of deviations	63.3130(g)
Startup, shutdown, and malfunction plan/records	63.3130(h), 63.6(e)
Documentation of capture system efficiency determination	63.3130(j)
Documentation of add-on control device destruction or removal efficiency determination	63.3130(k)
Documentation of control device performance tests	63.3130(k), 63.10(b)
Determination of capture system and add-on control operating limits and compliance	63.3130(l)
Determination of transfer efficiency	63.3130(m)
Work practice plan/records	63.3130(n)

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.

In addition, 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.

(ii) Respondent Activities

Respondent Activities
Read instructions.

Respondent Activities
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D5066-91, D5087-02, D5965-02, D6093-97, D6266-00a test, 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 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.
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.
Transmit, or otherwise disclose the information.

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; startup, shutdown, malfunction plan; and the CMS quality control plan.
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 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 the emission standard. 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 the EPA 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

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR part 63, subpart IIII) (attached).

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. Where 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 25,190 (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

This ICR uses the following labor rates:

Managerial	$105.86 ($50.41 + 110%)
Technical	$92.61 ($44.10 + 110%)
Clerical	$45.32 ($21.58 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 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 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operating and Maintenance Costs

This section covers the costs associated with all types of continuous monitoring equipment (e.g., CEMS and continuous parameter monitors). The type of industry costs associated with the information collection activities in the 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 the regulation. 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. Operating and Maintenance (O&M) Costs

Capital/Startup vs. Operating 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)
CEM	$16,000	0	$0	$1,200	65	$78,000

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

The total Operating and Maintenance (O&M) costs for this ICR are $78,000. 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 $78,000. The continuous monitoring costs that are included in this section consist only of those capital/startup and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the

additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

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 $106,900 [see Table 2 in Section 6(e)].

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 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII), below.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, there are approximately 65 existing sources currently subject to the standard. It is estimated that an additional zero sources per year will become subject to the regulation in the next three years.

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 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	0	65	0	0	65
2	0	65	0	0	65
3	0	65	0	0	65
Average	0	65	0	0	65

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 65.

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	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	65	2	0	130
Excess emissions report	65	2	0	130
Startup, shutdown, malfunction report	16	1	0	16
			Total	276

The number of Total Annual Responses is 276.

The total annual labor costs are $2,243,787. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (attached).

Note that the total annual capital and O&M costs to the regulated entity are $78,000. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 25,190. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (attached). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $78,000. 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 2,539 labor hours at a cost of $106,900. See Table 2. Annual Agency Burden and Cost, NESHAP for Automobile and Light-duty Truck Surface Coating (attached).

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden hours and an increase in burden cost as currently identified in the OMB Inventory of Approved Burdens. These burden changes are not due to any program changes. The change in the burden and cost estimates occurred because the standard has been in effect for more than three years and the requirements are different during initial compliance (new facilities) as compared to on-going compliance (existing facilities). The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes purchasing monitoring equipment, conducting performance tests and establishing recordkeeping systems. This ICR reflects the on-going burden and costs for existing facilities. Activities for existing sources include continuously monitoring of pollutants and the submission of semiannual reports. The overall result is a decrease in burden hours, and an increase in costs due to the need to maintain the monitoring equipment.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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–2006–0736. 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), EPA West, Room 3334, 1301 Constitution Avenue, 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. 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-OECA–2006–0736 and OMB Control Number 2060-0550 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 Automobile and Light-duty Truck Surface Coating (40 CFR part 63, subpart IIII)

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=A*B)	(D) Respondents per year	(E) Technical person-hrs. per year (E=C*D)	(F) Management person-hrs. per year (F=E*0.05)	(G) Clerical person-hrs. per year (G=E*0.1)	(H) Annual costs ($)
1. Reporting requirements								
a. Read rule and instructions	4	1	4	65	260	13	26	26,633
b. Compile and process data	4	4	16	65	1,040	52	104	106,532
c. Write reports								
i. Initial notification	2	1	2	0	0	0	0	0
ii. Notification of compliance status	2	1	2	0	0	0	0	0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	0
iv. Notification of actual startup	2	1	2	0	0	0	0	0
v. Notification of performance test	2	1.2[1]	2.4	0	0	0	0	0
vi. Report of performance test	10	1.2[1]	12	0	0	0	0	0
vii. Semiannual report	6	2	12	65	780	39	78	79,899
viii. Excess emissions report	2	2	4	65	260	13	26	26,633
ix. Startup, shutdown, malfunction report	2	1[2]	2	16[2]	32	2	3	3,278

1 20 percent retest.
2 Estimated 25 percent of facilities use add-on controls, submit startup, shutdown, malfunction report once per year. (16, rounded).

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=A*B)	(D) Respondents per year	(E) Technical person-hrs. per year (E=C*D)	(F) Management person-hrs. per year (F=E*0.05)	(G) Clerical person-hrs. per year (G=E*0.1)	(H) Annual costs ($)
Subtotal Reporting Labor and Cost Burden					2,728			242,976
2. Recordkeeping requirements								
a. Read rule and instructions	4	1	4	65	260	13	26	26,633
b. Plan activities	12	1	12	65	780	39	78	79,899
c. Implement activities	12	1	12	65	780	39	78	79,899
d. Maintain record system for material used	20	1	20	65	1,300	65	130	133,166
e. Time to enter information								
i. Material usage	0.5	365	183	65	11,863	593	1,186	1,215,135
ii. Compliance calculation	2	12	24	65	1,560	78	156	159,799
f. Time to train personnel	10	1	10	65	650	33	65	66,583
g. Store, file, and maintain records	2	12	24	65	1,560	78	156	159,799
h. Retrieve records/reports	1	12	12	65	780	39	78	79,899
Subtotal Recordkeeping Labor and Cost Burden					22,462			2,000,812
Total Burden (Hrs) and Costs					21,905	1,095	2,190	
					Totals	25,190		$2,243,787

Table 2. Annual Agency Burden and Cost:
NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR part 63, subpart IIII)

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Number of respondents	(D) Technical person-hours per year (D=A*B*C)	(E) Management person-hours per year (E=D*0.05)	(F) Clerical person-hours per year (F=E*0.1)	(G) Annual costs ($)
1. Initial performance test	24	1	0	0	0	0	0
2. Repeat performance test	24	0.2	0	0	0	0	0
3. Report review							
a) Initial notification	8	1	0	0	0	0	0
b) Notification of performance test	8	1.2	0	0	0	0	0
c) Notification of compliance status	8	1	0	0	0	0	0
d) Notification of construction/reconstruction	8	1	0	0	0	0	0
e) Notification of actual startup	8	1	0	0	0	0	0
f) Report of performance test	8	1.2	0	0	0	0	0
g) Semiannual report	12	2	65	1,560.0	78.0	156.0	75,527
h) Excess emissions report	4	2	65	520.0	26.0	52.0	25,176
i) Startup, shutdown, malfunction report	8	1	16	128.0	6.4	12.8	6,197
Total Burden (Hrs) and Costs				2,208	110	221	
				Totals	2,539		$106,900