

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Aerospace Manufacturing and Rework

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework published at 40 CFR part 63, subpart GG were proposed on June 6, 1994, and promulgated on September 1, 1995. This regulation applies to existing and new aerospace manufacturing and rework facilities where the total hazardous air pollutants (HAP) emitted are greater than or equal to 10 tons per year of any combination of HAP, or where the total HAP emitted are greater than or equal to 25 tons per year of any combination of HAP. New facilities include those that commenced construction or reconstruction after the date of the proposal. Operations covered include: cleaning, primer and top coat application, depainting, chemical milling maskant application, and handling and storage of waste. This information is being collected to ensure compliance with 40 CFR part 63, subpart GG.

In general, all NESHAP standards require initial notifications, performance tests, and compliance status 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. Semiannual reports are also required. 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.

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

Over the next three years, an average of 136 facilities per year will be subject to the standard, and it is estimated that no additional sources per year will be becoming subject to the standard.

The burden to the subject industry may be found in Table 1: Annual Industry Burden and

Cost – NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG), which is comprised of three sections (1a, 1b, and 1c). The total reporting burden in Table 1 is 13,829 hours. The total recordkeeping burden is 127,189. The cost to comply with the standard is \$136,000 per year as shown in section 6(b)(iii).

There are approximately 136 aerospace manufacturing and rework facilities in the United States, which are owned and operated by the aerospace manufacturing and rework industry. None of the 136 facilities in the United States are owned by state, local, tribal or the Federal government. They are owned and operated by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG).

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 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, HAP emissions from aerospace manufacturing and rework facilities 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 GG.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that 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.

3. Nonduplication, Consultations, and Other Collection Criteria

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

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

3(c) Consultations

Over the next three years, an average of 136 facilities per year will be subject to the standard, with no additional sources per year becoming subject to the standard. In estimating the affected number of sources and the growth rate of aerospace manufacturing and rework facilities

subject to this standard, EPA contacted Mr. William Chadwick and Mr. Hoai Huynh at (703) 358-1000, Aerospace Industries Association, who also consulted with other committee members. 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 Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

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 aerospace manufacturing and rework. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) codes are found in the following table:

40 CFR part 63, subpart GG	SIC Codes	NAICS Codes
Aircraft and Parts	3720	
Aircraft Manufacturing	3721	336411
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Other Aircraft Part and Auxiliary Equipment Manufacturing	3728	336413
Fluid Power Valve and Hose Fitting Manufacturing	3728	332912
Aircraft Manufacturing	3728	336411
Guided Missiles, Space Vehicles, and Parts	3760	
Guided Missiles and Space Vehicles Manufacturing	3761	336414
Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	3764	336415
Other Guided Missile and Space Vehicle Parts and Auxiliary Equipment Manufacturing	3769	336419
Airports, Flying Fields, and Airport Terminal Services	4581	488119

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 recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG).

A source must make the following reports:

Notifications	
Notification of construction and modification	63.743(a)(2) and (3), 63.753(a), 63.6(e), 63.5(d), 63.10(d)(5)
Initial notification for existing sources	63.9(b)(2), 63.753(a)(2)

Notifications	
Notification of performance test and results	63.7(b), 63.7(g)(1), 63.9(e), 63.10(d)(2), 63.753(a)
Notification and report of physical and operational changes	63.5(b)(6), 63.743(a)(2), 63.753(a)
Notification and report of production capacity	63.9(b)(2), 63.753(a)
Notification and report of compliance status	63.9(h), 63.753(a)
Report of startup, shutdown, malfunction plan	63.10(a), 63.10(d)(5), 63.743(b), 63.753(a)
Notification and report for waiver applications	63.7(h)(3), 63.753(a)
Semiannual report	63.6(e), 63.10(d)(5), 63.10(e)(3), 63.753(b), 63.753(c)(1), 63.753(d)(1) and (3), 63.753(e)
Annual report	63.753(c)(2), 63.753(d)(2)

A source must keep the following records:

Recordkeeping	
5-years retention of records	63.10(b)(1), 63.752(a)
Records of daily and monthly inspections	63.6(e)(3), 63.10(b)(2), 63.743(a)(3), 63.752(a)
Emission testing	63.10(b)(2), 63.752(a)
Facility operation and maintenance including startup, shutdown, malfunction, construction and modification	63.5(b), 63.6(e), 63.743(a)(2) and (3), 63.743(b), 63.752
Cleaning solvents, all information records	63.752(b)(1)
Cleaning solvents, approved composition and vapor pressure, solvent usage records	63.752(b)(2)
Cleaning solvents, non-approved composition, approved vapor pressure, solvent usage records	63.752(b)(3)
Cleaning solvents, usage log for exempt processes	63.752(b)(4)
Cleaning solvents, log of spray gun cleaner leaks	63.752(b)(5)
Primers/topcoats/maskants: Records using compliant coatings without averaging	63.752(c)(1-3), 63.752(f)(1)
Primers/topcoats/maskants: Records using averaging	63.752(c)(1), 63.752(c)(4), 63.752(f)(2)
Primers/topcoats/maskants: Records using control devices	63.752(c)(1), 63.752(c)(5-6), 63.752(d), 63.752(f)(3), 63.752(f)(4)
Chemical strippers, records and parts removed	63.752(e)(1), 63.752(e)(4)
Chemical strippers, records using control devices	63.752(e)(2), 63.752(e)(3)

Recordkeeping	
Depainting equipment malfunction log	63.752(e)(5)
Annual exempt chemical stripper usage log and reworked airplane log for spot stripping and decal removal	63.752(e)(6)
Depainting control device maintenance log	63.752(e)(7)

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 wet scrubber.
Perform initial performance test, Reference Method 1,1A, 2, 2A, 2C, 2D, 3, 4, 18, 24, 25A, 40, 301, or 319 as applicable, 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 Online Tracking Information System (OTIS).

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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS 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

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG).

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 141,018 (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	\$105.86	(\$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, June 2006, "Table 10. Private industry, 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/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 are 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)
CEM	\$14,000	0	\$0	\$1,000	136	\$136,000

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

The total operation and maintenance (O&M) costs consists of photocopying, and postage are \$136,000. 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 \$136,000.

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 \$186,721.

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: Average Annual EPA Burden, NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG), 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 136 existing respondents will be subject to the standard. It is estimated that no additional sources per year will become subject. The overall average number of respondents, as shown in the table below is 136 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 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	(E) Number of Respondents (E=A+B+C-D)
1	0	136	0	0	136
2	0	136	0	0	136
3	0	136	0	0	136
Average	0	136	0	0	136

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 136.

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

Total Annual Responses					
(A) Number of New Respondents	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents That Keep Records but Do Not Submit Reports	(E) Total Annual Responses $E=(AxB)+(CxD)+F$
0	0	136	4	0	544

The number of Total Annual Responses is 544.

The total annual labor costs are \$12,575,605. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG), 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 \$12,575,605. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG), below. Furthermore, the annual public reporting

and recordkeeping burden for this collection of information is estimated to average 259 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$136,000. 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 4,431 labor hours at a cost of \$186,721. See Table 2. Annual Agency Burden and Cost: NESHP for Aerospace Manufacturing and Rework (40 CFR part 63, subpart GG), below.

6(f) Reasons for Change in Burden

There is an adjustment decrease of 627 hours in the total estimated burden hours as currently identified in the OMB inventory of Approved Burdens. This decrease is not due to any program changes.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 259 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-2006-0726. 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 Avenue, 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-2006-0726 and OMB Control Number 2060-0314 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 1a: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG) (Cleaning Operations)

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. Reporting requirements								
A. Read instructions ^c	1	1	1	136	136	7	14	\$13,970.46
B. Required activities	N/A							
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write Report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes ^d	8	1	8	7	56	3	6	\$5,775.66
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of change in production capacity ^c	2	1	2	0	0	0	0	\$0
Compliance status information report	20	1	20	136	2,720	136	272	\$278,623.20
Waiver application ^e	4	1	4	14	56	3	6	\$5,775.66
Startup, shutdown, malfunction plan ^f	4	1	4	136	544	27	54	\$55,685.34
Preparation of site-specific test plan	N/A							
Notification of initial performance test	N/A							
Report of initial test	N/A							
Startup, shutdown, malfunction report ^g	2	1	2	27	54	3	5	\$5,545.12
Semiannual report – including report of periods of noncompliance ^h	12	2	24	109	2,616	131	262	\$286,009.26
4. Recordkeeping requirements								
A. Read instructions	See 3A							

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
B. Plan activities	4	1	4	136	544	27	54	\$55,685.34
C. Implement Activities								
Solvent information records	4	2	8	136	1,088	55	109	\$111,521.86
Approved composition solvent records (demonstrating compliance) ⁱ	4	1	4	41	164	8	16	\$16,760.04
Non-approved list solvent usage records ^j	1	12	12	122	1,464	73	146	\$149,925.54
Solvent usage log for exempt processes ^k	0.5	12	6	95	570	29	57	\$58,440.88
Log of gun cleaner leaks ^l	1	6	6	27	162	8	16	\$11,714.82
D. Develop record system ^m	20	1	20	136	2,720	136	272	\$278,623.20
E. Time to enter information								
Records of startup, shutdown, and Malfunction, etc ^g	2	1	2	27	54	3	5	\$5,545.12
Records of all measurements and Information required by standard	See 4C							
F. Time to train personnel	4	50	200	136	27,200	1,360	2,720	\$2,786,232.00
G. Time for audits	20	1	20	136	2,720	136	272	\$278,623.20
Subtotals Labor Burden and cost					42,868	2,145	4,286	\$4,404,456.70
TOTAL LABOR BURDEN AND COST (rounded)						49,299		\$4,404,457

Assumptions:

^a We have assumed that the average number of major sources that will be subject to the rule will be the 136 existing sources. There will be no 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: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2006, ATable 10. Private industry, 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 there will be no net growth for the industry over the three-year period of this ICR.

^d We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report.

^e We have assumed that 10 percent of the total existing facility population will request a waiver.

^f This is based on the number of facilities with add-on control systems that require the development of inspection and maintenance and startup, shutdown, malfunction plan. We have assumed that all of the facilities will have enclosed gum cleaners.

^g We have assumed that 20 percent of facilities with add-on control system will have a malfunction.

^h We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way.

ⁱ We have assumed that 30 percent of facilities will use the approved list solvents.

^j We have assumed that 90 percent of facilities will use some solvents not on the approved list.

^k We have assumed that 70 percent of facilities will use some solvents for exempt processes.

^l We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner.

^m We have assumed that all facilities will need to develop a record keeping system.

Table 1b: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG) (Coating Operations)

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. Reporting requirements								
A. Read instructions ^c	1	1	1	136	136	7	14	\$13,970.46
B. Required activities								
Initial performance tests ^d	280	1	280	4	1,120	56	112	\$114,727.20
Repeat performance test ^e	280	1	280	1	280	14	28	\$28,681.80
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write Report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes ^f	8	1	8	7	56	3	6	\$5,775.66
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of change in production capacity ^c	2	1	2	0	0	0	0	\$0
Compliance status information report	10	1	10	136	1,360	68	136	\$139,311.60
Waiver application ^g	4	1	4	14	56	3	6	\$5,775.66
Startup, shutdown, malfunction plan ^h	4	1	4	41	164	8	16	\$16,760.04
Preparation of site-specific test plan	See 3B							
Notification of initial performance test	2	1	2	4	8	1	1	\$819.48
Report of initial test	See 3B							
Startup, shutdown, malfunction report ⁱ	4	1	4	27	108	6	11	\$11,135.56
Semiannual report – including report of periods of noncompliance ^j	11	2	22	109	2,398	120	240	\$245,658.78

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
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	4	1	4	136	544	27	54	\$55,685.34
C. Implement Activities								
Compliant coating records	1	12	12	136	1,632	82	163	\$167,207.20
Daily records of weighted average mass ^k	1	250	250	14	3,500	175	350	\$358,522.50
Control device maintenance or rolling material balance log (organics)	0.5	250	125	4	500	25	50	\$51,217.50
Control device maintenance log (inorganics)	0.25	250	63	136	8,568	429	857	\$877,735.66
D. Develop record system ^l	10	1	10	136	1,360	68	136	\$139,311.60
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction, etc ⁱ	2	1	2	27	54	3	5	\$5,545.12
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel	8	50	400	136	54,400	2,720	5,440	\$5,572,464.00
G. Time for audits	20	1	20	136	2,720	136	272	\$278,623.20
Subtotals Labor Burden and cost					79,508	3,979	7,952	\$8,088,928.34
TOTAL LABOR BURDEN AND COST (rounded)						90,812		\$8,088,928.

Assumptions:

^a We have assumed that the average number of major sources that will be subject to the rule will be the 136 existing sources. There will be no 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: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2006, ATable 10. Private industry, 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 there will be no net growth for the industry over the three-year period of this ICR.

^d We have assumed that 10 percent of existing facilities will use add-on control equipment for maskant application (40x10%)

^e We have assumed that 20 percent of existing facilities with add-on control equipment will repeat performance test (40x20%x10%).

^f We have assumed that 5 percent of the existing facilities will write the physical and operational changes report.

^g We have assumed that 10 percent of facilities will request a waiver.

^h We have assumed that 30 percent of facilities will be required to submit operational plans due to deviations from manufacturers' specifications, and also based on the number of facilities with add-on control systems that require the development of inspection and maintenance and startup, shutdown, malfunction plan.

ⁱ We have assumed that 20 percent of facilities with add-on control system (including particulate filters) will have a malfunction.

^j We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way.

^k The final rule requires monthly records. Daily averaging was included in the cost analysis because 90 percent of the industry is located in non-attainment areas and will be required to use daily averaging by the permitting agency.

^l We have assumed that all facilities will need to develop a record keeping system.

Table 1c Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG) (Depainting Operations)

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. Reporting requirements								
A. Read instructions	1	1	1	5	5	1	1	\$2,003.38
B. Required activities								
Initial performance test ^{c,d}	280	1	280	0	0	0	0	\$0
Repeat performance test ^{c,e}	280	1	280	0	0	0	0	\$0
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write Report								
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes ^{c,f}	8	1	8	0	0	0	0	\$0
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of change in production capacity ^c	2	1	2	0	0	0	0	\$0
Compliance status information report	10	1	10	5	50	3	5	\$5,174.68
Waiver application ^g	4	1	4	0	0	0	0	\$0
Startup, shutdown, malfunction plan ^h	5	1	5	0	0	0	0	\$0
Preparation of site-specific test plan	N/A							
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Report of initial test	See 3B							
Startup, shutdown, malfunction report ⁱ	4	1	4	0	0	0	0	\$0
Semiannual report – including report of	12	2	24	4	96	5	10	\$9,873.06

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
periods of noncompliance ^j								
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	4	1	4	5	20	1	2	\$2,048.70
C. Implement Activities ^k								
Chemical stripper records (demonstrating compliance)	8	1	8	4	32	2	3	\$3,311.20
Chemical stripper usage log	1	12	12	4	48	3	5	\$4,989.46
Depainting equipment malfunction log	4	3	12	2	24	1	2	\$2,419.14
Exempt stripper usage log and reworked airplane log spot stripping and decal Removal	1	12	12	5	60	3	6	\$6,146.10
Record of parts removed for parts Depainting	8	2	16	5	80	4	8	\$8,194.80
Control device maintenance log	0.5	250	125	2	250	13	25	\$25,661.68
D. Develop record system ^l	10	1	10	5	50	3	5	\$5,174.68
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction, etc ⁱ	2	1	2	0	0	0	0	\$0
Records of all measurements and Information required by standard	See 4C							
F. Time to train personnel	4	1	4	5	20	1	2	\$2,048.70
G. Time for audits	10	1	10	5	50	3	5	\$5,174.68
Subtotals Labor Burden and cost					785	43	79	\$82,220.26
TOTAL LABOR BURDEN AND COST (rounded)						907		\$82,220

Assumptions:

^a We have assumed that the average number of major sources that will be subject to the rule will be the 136 existing sources. There will be no 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: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2006, ATable 10. Private industry, 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 there will be no net growth for the industry over the three-year period of this ICR.
- ^d We have assumed that 1 percent of the total existing facilities will use add-on control equipment for HAP containing chemical stripper usage (70% of 5)
- ^e We have assumed that 20 percent of facilities with add-on control equipment will repeat performance test (20% of 1% of 5).
- ^f We have assumed that 5 percent of existing facilities (total facilities include only the 96 rework facilities) will write the physical and operational changes report.
- ^g We have assumed that 10 percent of facilities will request a waiver.
- ^h Based on the number of facilities with add-on control systems that require the development of inspection and maintenance and startup, malfunction plan. We assumed that 15 percent will use blasting equipment that must have add-on control equipment. Assume that 29 percent of blasting operations will operate particulate control systems according to manufacturer's specifications and that only 30 percent will be required to submit operational plans due to deviations from manufacturer specification. Also assume that 1 percent of all facilities will use HAP containing chemical strippers with emissions control systems and 70 percent will use non-HAP chemical strippers which do not require add-on control equipment.
- ⁱ We have assumed that 20 percent of facilities with add-on control system will have a malfunction.
- ^j We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way.
- ^k We have assumed that one percent of facilities will use HAP containing chemical strippers as the primary stripping technique, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.
- ^l We have assumed that all respondents will need to develop a record keeping system.
- ^m We have assumed that all facilities will need to develop a record keeping system.

Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c - NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG)

Summary		
Burden Item	Total Hours Per Year	Annual Costs in \$ (rounded)
1a. Cleaning	49,299	\$4,404,457
1b. Coating Application	90,812	\$8,088,928
1c. Depainting	907	\$82,220
Total Burden and Cost	141,018	\$12,575,605

Table 2: Average Annual EPA Burden - NESHAP for Aerospace Manufacturing and Rework (40 CFR Part 63, Subpart GG)

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. Initial performance test	80	0	0	0	0	0	0	\$0
2. Repeat performance test								
Retesting preparation ^c	16	1	16	1	16	1	2	\$795.62
Retesting ^d	80	1	80	0	0	0	0	\$0
3. Report review								
Notification of construction/ Reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical or operational Changes ^e	2	1	2	14	28	2	3	\$1,395.20
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of changes in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report ^f	6	1	6	279	1,674	89	167	\$81,345.72
Waiver application ^g	6	1	6	28	168	8	17	\$8,115.12
Review of startup, shutdown, malfunction plan ^h	6	1	6	177	1,062	53	106	\$51,406.24
Review of site specific test plan	N/A							
Notification of initial performance test ⁱ	2	1	2	4	8	1	1	\$426.90
4. Report review								
Report of initial test	8	1	8	0	0	0	0	\$0
Review of startup, shutdown, malfunction reports	4	1	4	55	220	11	22	\$10,651.30
Review of semiannual reports ^j	3	1	3	222	666	39	67	\$32,585.36
Subtotals Labor Burden and cost					3,842	204	385	\$186,721.46
TOTAL ANNUAL BURDEN AND COST (rounded)						4,431		\$186,721

Assumptions:

- ^a We have assumed that the average number of major sources that will be subject to the rule will be the 136 existing sources. There will be no 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 each respondent will take 16 hours to prepare for retesting.
- ^d We have assumed that 20 percent of respondents will fail the initial performance test and will have to be retested.
- ^e We have assumed that it will take each of the respondents two hours to review the notification of physical or operational changes.
- ^f We have assumed that each respondent will take 6 hours to review the compliance status information report.
- ^g We have assumed that 28 respondents will take 6 hours each to review the waiver application.
- ^h We have assumed that it will take 6 hours to review the startup, shutdown, malfunction plan.
- ⁱ We have assumed that it will take each respondent 2 hours to the initial performance test notification.
- ^j We have assumed that it will take each respondent 3 hours to review the semiannual report.