

SUPPORTING STATEMENT

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR NINE METAL FABRICATION AND FINISHING AREA SOURCES

PART A

1.0 Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

“National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Area Sources.” This is a new information collection request (ICR), and the EPA tracking number is 2298.01.

(b) *Short Characterization.*

This ICR covers information collection requirements in the proposed area source rule for Metal Fabrication and Finishing (40 CFR part 63, subpart XXXXXX).

The potential respondents are owners or operators of any existing or new metal fabrication and finishing facility that is an area source of hazardous air pollutants (HAP) emissions and 1) uses or emits one or more of the following metal HAP: cadmium, chromium, lead, manganese, or nickel (hereafter referred to as Metal Fabrication Hazardous Air Pollutants (MFHAP)); or 2) operates spray painting and coating operations which use or emit any volatile organic HAP (VOHAP). There are an estimated 5,800 facilities subject to the NESHAP for the Metal Fabrication and Finishing Area Source Category. The affected sources consist of several types of metal fabrication and finishing processes, including any abrasive blasting, metalworking (which includes machining, and dry grinding and dry polishing with machines), spray painting and coating, and welding operations that use or emit any MFHAP. The affected sources also include any spray painting and coating operations which use or emit any VOHAP. Existing area source metal fabrication and finishing facilities are currently well-controlled in terms of metal air toxics emissions as a result of State and national standards, permitting requirements, OSHA workplace standards, and/or management practices already taken by the industry to reduce air toxics.

Abrasive Blasting. Owners or operators of completely enclosed and unvented blast

chambers would be required to comply with the following management and pollution prevention practices: (1) minimize dust or PM generation, as a surrogate for MFHAP, during emptying of the enclosure; and (2) operate equipment according to manufacturer's instructions. Owners or operators of abrasive blasting operations blasting substrates of less than or equal to 8 feet in any dimension would be required to perform blasting within an enclosure designed to prevent visible PM emissions, as a surrogate for MFHAP, from occurring from the process. Owners or operators of abrasive blasting operations blasting substrates of greater than 8 feet in any dimension would be required to comply with the following management and pollution prevention practices to prevent visible emissions from occurring from the processes: (1) desist from performing blasting outside when wind velocity is greater than 25 mph; (2) switch from high PM-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., steel shot, aluminum oxide), whenever possible or practicable, where PM is used as a surrogate for MFHAP; (3) desist from blasting substrates having coatings containing lead (>0.1 percent lead), unless enclosures, barriers, or other precautions are taken to collect the lead particles; and (4) desist from re-using blast media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening so that the abrasive material conforms to its original size. Owners or operators of all abrasive blasting operations which (other than completely enclosed and unvented blast chambers) would also be required to comply with the following management and pollution prevention practices: (1) keep work areas free of excess dust or PM, as a surrogate for MFHAP, by regular sweeping to control the accumulation of dust and other particles; (2) enclose dusty material storage areas and holding bins, seal chutes and conveyors; and (3) operate all equipment according to manufacturer's instructions.

Machining. Owners or operators of machining operations would be required to comply with the following management and pollution prevention practices to minimize dust generation in the workplace: (1) keep work areas free of excess dust or PM, as a surrogate for MFHAP, by regular sweeping to control the accumulation of dust and other particles; regular sweeping is defined to be sweeping conducted once per day, once per shift, or once per operation as needed, depending on the severity of dust generation; and (2) operate equipment according to manufacturer's instructions.

Dry Grinding and Dry Polishing with Machines. Owners or operators of dry grinding and dry polishing with machines operations would be required to comply with the following management and pollution prevention practices: (1) keep work areas free of excess dust or PM, as a surrogate for MFHAP, by regular sweeping to control the accumulation of dust and other particles; regular sweeping is defined to be sweeping conducted once per day, once per shift, or once per operation as needed, depending on the severity of dust generation; and (2) operate equipment according to manufacturer's instructions.

Spray Painting – VOHAP. Owners or operators of spray painting operations using or emitting VOHAP would be required to limit paint and coatings to no more than 3.0 pounds VOHAP per gallon paint solids (0.36 kg/liter) on an annual (12 month) rolling average basis, and comply with the following management and pollution prevention practices: (1) minimize VOHAP emissions during mixing, storage, and transfer of paints; and (2) keep paint and solvent lids tightly closed when not in use.

Spray Painting – MFHAP. Owners or operators of spray painting operations of objects less than or equal to 15 feet to would be required to comply with a requirement for spray booths and spray booth filters. Owners or operators of all spray painting operations using or emitting MFHAP would be required to comply with an equipment standard to require low-emitting and pollution preventing spray gun technology and management practices of spray gun cleaning and spray painter training. All affected spray-applied paints would be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, or airless spray gun. All affected paint spray gun cleaning would be required to be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. All workers that perform affected spray painting are to be certified as having completed classroom and hands-on training in the proper selection, mixing, and application of paints, or the equivalent. This spray painting portion of the proposed rule would only apply to those spray painting operations that have the potential to emit MFHAP; other spray painting operations are not affected spray painting sources in this rule and would not need to comply with this part of the rule.

Welding. Owners or operators of welding operations would be required to minimize or reduce welding fume or PM emissions, as a surrogate for MFHAP, by implementing

management and pollution prevention practices as they deem necessary and appropriate for their operations. The welding portion of this rule would only apply to those welding operations that have the potential to emit MFHAP; other welding operations are not affected sources in this rule and would not need to comply with this part of the proposed rule. There are many different welding processes commonly used in the metal fabrication and finishing industry, thus there is no one “best” method that can be specified to reduce welding fumes. As an alternative to the work practice standards, facilities may use PM capture and control devices to collect the welding fume, as a surrogate for MFHAP, with operation of the capture and control devices according to the manufacturer’s instructions.

Compliance, Monitoring, Reporting, and Recordkeeping. New requirements for existing area sources would include one-time notifications, annual compliance certifications, and annual reports of exceedences. Records to demonstrate regulatory compliance are also required. Affected facilities would be exempt from Title V permitting requirements.

All affected sources (except for Spray Painting VOHAP sources) must perform regular visual determinations of fugitive emissions using EPA Method 22. Daily Method 22 testing is required initially, with a graduated schedule that allows for reduction in the frequency of tests from daily to weekly to monthly over time as long as no visible emissions are detected. If visible emissions are detected, corrective action may be required to eliminate the emissions, along with a return to daily Method 22 testing. Welding affected sources for which visible emissions are repeatedly detected may be required to perform Method 9 tests for emissions opacity. The method 9 tests are performed on a graduated schedule, similar to that for the Method 22 tests. Method 9 tests showing opacity in excess of 20 percent will require the facility to prepare and implement a Site Specific Welding Emissions Management Plan (SWMP), and submit a notification of exceedence of 20% opacity.

The information collection requirements for existing and new sources in the Metal Fabrication and Finishing Source Category are listed in Attachment 1.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tons per year [tpy] of any single HAP and more than 25 tpy of any combination of HAP). Requirements for area sources in CAA sections 112(c) (3) and 112(k) direct EPA to (1) identify at least 30 air toxics that present the greatest potential health threat in the largest number of urban areas and (2) to identify sufficient area source categories to ensure that sources representing 90 percent or more of the emissions of the 30 “listed” HAP are subject to regulation. EPA implements these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). EPA added Metal Fabrication and Finishing to the Integrated Urban Air Toxics Strategy area source category list on November 22, 2002 (67 FR 70427.) The initial listing of the Metal Fabrication and Finishing Area Source Category was based on emissions of cadmium, chromium, lead, manganese, and nickel. Each of these HAP metals is on the list of 30 HAP identified in the 1999 strategy.

Under CAA section 112(d)(5), EPA may elect to promulgate HAP standards for area sources based on the use of generally available control technology (GACT) or management practices used by the sources. EPA can consider costs and economic impacts in determining GACT, which is particularly important when developing regulations for source categories that may have few establishments and many small businesses, or when determining whether additional control is needed for sources that are already well-controlled as a result of other air emissions standards.

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for 5

years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(b) Use/Users of the Data.

The information will be used by the delegated authority (State agency, or Regional Administrator if there is no delegated State agency) to ensure that the standards and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which facilities, records, or processes may need inspection.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

A computer search of EPA’s ongoing ICRs revealed no duplication of information-gathering efforts.

(b) Public Notice Required Prior to ICR Submission to OMB.

This section is not applicable because this is a rule-related ICR.

(c) Consultations.

The proposed rule was developed in consultation with individual companies, State agencies, and trade associations. The non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone No.
Matt Steinman	Abrasive Blast Systems, Inc.	(770) 938-7263
Pam Lacey	American Gas Association. placey@aga.org	(202) 824-7000
Roger E. Ferch	American Institute of Steel Construction ferch@aisc.org	(312) 670-5401
Scott Humphreys	CRSI Concrete Reinforcing Steel Institute shumphreys@crsi.org	(847) 517-1200
Myron Faulk	Empire Abrasive Equipment Co.	(813) 681-6707
Charles H. Hageman	Forging Industry Association	(216) 781-6260
Greg Romanyshyn	Hydraulic Institute gromanyshyn@pumps.org	(973) 267-9700
Anne Goyer	Industrial Heating Equipment Association ihea@ihea.org	(513) 231-5613
Laura Keller	Stites & Harbison (AISC Lawyer) lkeller@stites.com	859-226-2378

Contact	Organization	Telephone No.
Dick La Lumondier	National Electrical Manufacturers Association ric_lalumondier@nema.org	(703) 841-3237
Cory Reynolds	John Deere	(563) 589-6343
Jerry Siko	Lincoln Electric Inc.	(480) 348 2004
James Dale	Metal Powder Industries Federation JDale@mpif.org	(609) 452-7700 ext 105
Pat O'Conner	Kent & O'Connor patoconnor@kentoconnor.com Attorney for Steel Tank Institute/Steel Plate Fabricators Association	(202) 223-6222
Harvey R, Castner	Edison Welding Institute HCASTNER@ewi.org	(614) 688-5063
Marc Pasternak	mpasternak@vma.org	(202) 296.0378

(d) *Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) will not be reasonably assured that a facility is in compliance with the standards.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) *Confidentiality.*

All 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 (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes.*

Potential respondents under Subpart XXXXXX are owners or operators of any existing or new facility engaged in one or more of the following operations: abrasive blasting, metalworking (which includes machining, and dry grinding and dry polishing with machines),

spray painting and coating, and welding. Metal fabrication and finishing facilities are classified under the following nine source categories (listed alphabetically): (1) Electrical and Electronic Equipment Finishing Operations (SIC's 3699, 3621), (2) Fabricated Metal Products (SIC 3499), (3) Fabricated Plate Work (Boiler Shops) (SIC 3443), (4) Fabricated Structural Metal Manufacturing (SIC 3441), (5) Heating Equipment, except Electric (SIC 3433), (6) Industrial Machinery and Equipment: Finishing Operations (SIC 3531, 3533, 3561), (7) Iron and Steel Forging (3462), (8) Primary Metal Products Manufacturing (SIC 3399), and (9) Valves and Pipe Fittings (SIC 3494) that have operations that can be described by the following 15 NAICS codes (listed in numerical order): 332111, Iron and Steel Forging ; 332117, Powder Metallurgy Part Manufacturing; 332312, Fabricated Structural Metal Manufacturing; 332313, Plate Work Manufacturing; 332410, Power Boiler and Heat Exchanger Manufacturing; 332420, Metal Tank (Heavy Gauge) Manufacturing; 332618, Other Fabricated Wire Product Manufacturing; 332919, Other Metal Valve and Pipe Fitting Manufacturing; 332999, All Other Miscellaneous Fabricated Metal Product Manufacturing; 333120, Construction Machinery Manufacturing; 333132, Oil and Gas Field Machinery and Equipment Manufacturing; 333414, Heating Equipment (except Warm Air Furnaces) Manufacturing; 333911, Pump and Pumping Equipment Manufacturing; 335312, Motor and Generator Manufacturing; 335999, All Other Miscellaneous Electrical Equipment & Component Manufacturing.

There are an estimated 5,800 facilities that will be subject to the NESHAP for the Metal Fabrication and Finishing Area Source Category; no new Metal Fabrication and Finishing area sources are expected during the 3year period of this ICR.

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements. Attachment 1, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Metal Fabrication and Finishing Area Source Category.

(ii) Respondent Activities. The respondent activities that will be required by the proposed Metal Fabrication and Finishing Rule are identified in Table 2 and are introduced in section 6(a).

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

(a) *Agency Activities.*

The Agency activities associated with the proposed Metal Fabrication and Finishing Rule are provided in Table 3 and are introduced in section 6(c).

(b) *Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The notifications of compliance status, annual compliance certifications, and reports of exceedences required under the proposed rule are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the State agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (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.

(c) *Small Entity Flexibility.*

The Small Business Administration defines a small entity for the metal fabrication and finishing industry as a firm having no more than 500 to 1,000 employees (depending on the size definition for the affected NAICS code). The only measurable costs attributable to the proposed standards are the costs of visible emissions monitoring and the minimal notification, recordkeeping, and reporting requirements. The proposed standard is estimated to impact a total of 5,800 area source facilities. We estimate that over 5,300 of these facilities are small entities. Our analysis indicates that the proposed rule would not impose a significant adverse impact on any facilities, large or small since these costs are less than 0.1 percent of revenues.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 2 for the Metal Fabrication and Finishing Area Source Category.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The annual burden estimates for the proposed Metal Fabrication and Finishing NESHAP are shown in Table 2. These numbers were derived from estimates based on EPA's experience with other standards. No burden estimates are provided for new area sources because no new facilities are expected to become affected sources during the 3-year period of this ICR.

(b) Estimating Respondent Costs.

The information collection activities for the proposed Metal Fabrication and Finishing NESHAP are presented in Table 2. Because the data are already collected by respondents as part of normal operations, no respondent development costs are associated with the information collection activities.

(i) Estimating Labor Costs. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, June 2007, "Table 2. National Compensation Survey: Occupational Wages in the United States" available at <http://www.bls.gov/ncs/ocs/sp/ncbl0910.pdf>. Wages for technical labor are based on "Production occupations: Miscellaneous Assemblers & Fabricators" with a total compensation of \$15.08/hour. Wages for management labor are taken from "Production occupations: First-line supervisors/managers of production and operating workers" with a total compensation of \$22.99/hour. Wages for clerical labor are based on "Office and administrative support occupations: File clerks" with a total compensation of \$12.25/hour. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$31.67, management at \$48.28, and clerical at \$25.73.

(ii) Estimating Capital and Operations and Maintenance (O&M) Costs. There are no capital costs associated with the information collection requirements of the proposed Metal Fabrication and Finishing NESHAP. The proposed rule will not require affected facilities to purchase monitoring systems or conduct performance testing. There are no O&M costs associated with the proposed Metal Fabrication and Finishing NESHAP because existing

facilities are already in compliance with the requirements of the proposed NESHAP. Capital and O&M costs were not estimated for new sources because no new sources are expected during the next 3-year period.

(iii) *Annualizing Capital Costs.* For the proposed Metal Fabrication and Finishing NESHAP, there are no annualized capital costs.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Table 3.

The Agency labor rates are from the Office of Personnel Management (OPM) 2006 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2006-GS available on the OPM website, http://www.opm.gov/oca/06tables/html/gs_h.asp. The government employee labor rates are \$14.35/hour for clerical (GS-6, Step 3), \$26.53 for technical (GS-12, Step 1), and \$35.75/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$22.96; technical at \$42.45, and management at \$57.20.

(d) *Estimating the Respondent Universe and Total Burden and Costs.*

There are an estimated 5,800 existing facilities that will be subject to the Metal Fabrication and Finishing Area Source NESHAP. No new sources are expected during the next 3 years. Consequently, the average annual number of metal fabrication and finishing facilities during the 3-year period of this ICR is 1,933

For the proposed Metal Fabrication and Finishing NESHAP, the components of the total annual responses attributable to this ICR are one-time initial notifications, one-time notifications of compliance status, and annual compliance certifications for the 5,800 facilities that will be subject to the rule. In addition, facilities that experience an exceedence will have to submit a report of exceedence.

The number of total annual responses for subpart XXXXXX is estimated as: 5,897 (1,933 annual average respondents × 3 notifications, plus 97 average annual reports of exceedences).

(e) *Bottom Line Burden Hours and Cost Tables.*

(i) *Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The average annual burden for the recordkeeping and reporting requirements in subpart XXXXXX for the 5,800 existing facilities that subject to the Metal Fabrication and Finishing Area Source NESHAP is 35,268 person-hours, with an annual average cost of \$1,124,100 and annualized capital costs of \$0.

(ii) *The Agency tally.* The average annual Federal Government cost is \$469,395 for 11,339 hours for subpart XXXXXX. The bottom line Agency burden hours and costs presented in Table 3 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

This section does not apply because this is a new ICR.

(g) *Burden Statement*

The average annual respondent burden for the proposed NESHAP for Metal Fabrication and Finishing Area Sources is estimated at 6 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 currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2006-0306, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in one of the Docket ID Numbers identified above. 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 relevant Docket ID Number (EPA-HQ-OAR-2006-0306) in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with the proposed rule.

TABLE 2. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE PROPOSED STANDARD

	(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	(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,\$(a)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	N/A							
4. Reporting Requirements								
A. Read instructions (b)	4	1	4.0	1933	7,733	387	773	\$ 283,461
B. Required activities								
Initial Notification (c)	2	1	2.0	1933	3,867	193	387	\$ 141,731
Notification of Compliance Status (d)	4	1	4.0	1933	7,733	387	773	\$ 283,461
Annual Compliance Certification (e)	2	1	2.0	1933	3,867	193	387	\$ 141,731
Report of Exceederence (f)	2	1	2.0	97	193	9.7	19.3	\$ 7,087
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of all info. required by standards (g)	0.25	12	3.0	1,933	5,800	290	580	\$ 212,596
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A							
H. Time to transmit or disclose information (h)	0.25	1	0.25	5,897	1,474.17	74	147	\$ 54,035
I. Time for audits	N/A							
TOTAL ANNUAL BURDEN AND COST (SALARY)					30,668	1,533	3,067	\$ 1,124,100
TOTAL ANNUAL NUMBER OF RESPONSES (i)								5,897
ANNUAL CAPITAL COSTS:								
Total annual capital								N/A
ANNUALIZED CAPITAL COSTS: (j)								
Total annualized capital								N/A
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								N/A

N/A = Not Applicable.

(a) Costs are based on the following hourly rates: technical at \$31.67, management at \$48.28, and clerical at \$25.73. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) There are an estimated 5,800 existing metal fabrication and finishing plants and no new facilities are expected; the average number expected to read the rule during the 3-yr clearance period is 5,800/3 = 1,933.

(c) Each of the 5,800 existing plants noted above would be required to submit an Initial Notification.

(d) Each of the 5,800 existing plants noted above would be required to submit a Notification of Compliance Status.

(e) The 5,800 existing plants would be required to submit an Annual Compliance Certification at the end of Year 3 of the ICR clearance period, or 5,800/3 = 1,933.

(f) Assumes that 5% of existing facilities would have to submit a Report of exceedence starting in Year 3 of the ICR clearance period, or (5,800 x 0.05)/3 = 97.

(g) Recordkeeping requirements begin in Year 3 of ICR clearance period for all existing plants, or 5,800/3 = 1,933.

(h) Transmittals would include Initial Notifications for 5,800 plants, Notifications of Compliance Status for 5,800 plants, Annual Compliance Certifications for 5,800 plants (combined with exceedence Reports), for an average of (5,800+5,800+5,800)/3 = 5,800 for each year of the 3-yr ICR clearance period.

(i) The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 4B.

(j) Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = (i)(1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years).

TABLE 3. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE PROPOSED STANDARDS

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	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E x 0.05)	(G) Clerical person- hours per year (E x 0.1)	(H) Cost, \$ (a)
Report Review								
Initial Notification (b)	1	1	1.0	1,933	1,933	97	193	\$92,038
Notification of Compliance Status (c)	2	1	2.0	1,933	3,867	193	387	\$184,077
Annual Compliance Certification (d)	2	1	2.0	1,933	3,867	193	387	\$184,077
Report of Exceedence (e)	2	1	2.0	97	193	9.7	19.3	\$9,204
TOTAL BURDEN AND COST (SALARY)					9,860	493	986	\$469,395

(a) Costs are based on the following hourly rates: technical at \$42.45, management at \$57.20, and clerical at \$22.96.

Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) Assumes 5,800 existing and no new plants will complete Initial Notifications for an average of $(5,800)/3 = 1,933$ per year during each year of the 3-yr ICR clearance period.

(c) Each of the 5,800 existing plants noted above would be required to submit a Notification of Compliance Status.

(d) The 5,800 existing plants would be required to submit an Annual Compliance Certification at the end of Year 3 of the ICR clearance period, or $5,800/3 = 1,933$.

(e) Assumes that 5% of existing facilities would have to submit a Report of Deviation starting in Year 3 of the ICR clearance period, or $(5,800 \times 0.05)/3 = 97$.

N/A = Not applicable.

Total hours 11,339

ATTACHMENT 1. INFORMATION REQUIREMENTS--NESHAP FOR METAL FABRICATION & FINISHING AREA SOURCES

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Monitoring	N/A	N/A	N/A
Notifications			
Notification of applicability	§63.11519(a)(1)	§63.11519(a)(1)	40 CFR 63.9(a)(2)
Notification of construction/reconstruction	N/A	N/A	40 CFR 63.9(b)(5)
Notification of special compliance requirements	N/A	N/A	40 CFR 63.9(d)
Notification of performance test	N/A	N/A	40 CFR 63.9(e)
Notification of opacity/VE observations	N/A	N/A	40 CFR 63.9(f)
Additional CMS notifications	N/A	N/A	40 CFR 63.9(g)
Notification of compliance status	§63. 11519(a)(2)	§63. 11519(a)(2)	40 CFR 63.9(h)
Notification of changes in information	N/A	N/A	40 CFR 63.9(j)
Plans			
Site-Specific Welding Emissions Mgmt. Plan	§63. 11516(f)(7)(ii)	§63. 11516(f)(7)(ii)	N/A
SSM plan	N/A	N/A	40 CFR 63.6(e)(3)
Performance test plan	N/A	N/A	40 CFR 63.7(c)(2)
CMS quality control plan	N/A	N/A	40 CFR 63.8(d)
CMS performance evaluation test plan	N/A	N/A	40 CFR 63.8(e)(3)
Records			
Records of notifications	§63. 11519 (c)(1)(i)	§63. 11519 (c)(1)(i)	40 CFR 63.10
Records that demonstrate continuous compliance	§63. 11519 (c)(1)&(4)-(12)	§63. 11519 (c)(1)&(4)-(12)	40 CFR 63.10
Monitoring/inspection information	§63. 11519 (c)(2)&(3)	§63. 11519 (c)(2)&(3)	40 CFR 63.10
Reports			
Reports of exceedences	§63. 11519 (b)(8)	§63. 11519 (b)(8)	N/A
Semiannual monitoring reports	N/A	N/A	N/A
Initial/repeat performance tests	N/A	N/A	40 CFR 63.7(e)(1) /40 CFR63.6(h)(7)
Quality assurance test plan	N/A	N/A	40 CFR 63.7(c)
CMS performance evaluation/report	N/A	N/A	40 CFR 63.8(e)(5)
SSM reports	N/A	N/A	40 CFR 63.6(e)(3)
Excess emissions reports	N/A	N/A	40 CFR 63.10(e)(3)
Annual compliance certifications	§63. 11519 (b)(1)	§63. 11519 (b)(1)	N/A