

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Metal Coil Surface Coating (40 CFR Part 60, Subpart TT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Metal Coil Surface Coating (40 CFR Part 60, Subpart TT) (Renewal), EPA ICR Number 0660.10, OMB Control Number 2060-0107

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subpart TT were proposed on January 5, 1981 and promulgated on November 1, 1982. These regulations apply to the following surface coating lines in the metal coil surface coating industry: each prime coat operation, each finish coat operation, and each prime and finish coat operation cured simultaneously where the finish coat is applied wet on wet over the prime coat. These regulations apply to metal coil coating facilities commencing construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart TT.

In general, all New Source Performance Standards (NSPS) require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

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 two 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.

Approximately 158 sources are currently subject to the regulation, and it is estimated that no additional sources per year will become subject to the regulation in the next three years. These numbers are based on previous experience with the industry and a recent search of the Agency's Air Facility Subsystem (AFS) data base.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The Clean Air Act (Act) provides authority to the Agency to establish standards to control air pollution and to ensure compliance with promulgated regulations through adequate recordkeeping and reporting by the affected industries (i.e., respondents). The regulations include the New Source Performance Standards (NSPS) under section 111 of the Act, the National Emission Standards for Hazardous Air Pollutants (NESHAP) which includes the original NESHAP standards and the more recent Maximum Achievable Control Technology (MACT) or NESHAP-MACT standards under section 112 of the Act, and emission guidelines for the designated types incinerators under section 129 of the Act.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard(s) are used by regulatory agencies, the public and the regulated community for a variety of reasons including the determination of the respondent's compliance status, analytical studies to demonstrate compliance trends, and evaluations regarding the efficacy of the promulgated regulations.

The required recordkeeping and reporting are also used to: 1) certify compliance with the regulations; 2) determine the respondent's compliance with the designated emission limitation(s); 3) notify regulatory agencies when a standard is violated; 4) evaluate continuous compliance through the use of emission or operational parameter monitors; and 5) ensure that plant personnel are following the required procedures and are periodically trained, as indicated.

3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested are required under 40 CFR part 60, subpart TT.

3(a) Nonduplication

The standards do not require duplication in the collection and reporting of information. If the subject standards have not been delegated, the information is sent directly to the appropriate Environmental Protection Agency (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.

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 on May 30, 2008 (73 FR 31088). No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has taken a number of steps to determine if consultations are needed to estimate the burden to industry. Any comments received since the last ICR renewal including those submitted in response to the first federal register notice announcing the renewal of this ICR have been reviewed. The Agency's internal industry experts have been consulted. The Agency's internal data sources and any projections of industry growth over the next three years have been considered. Based on this information, we have concluded that additional consultations would not change our estimate of burden.

The Agency's primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility Subsystem) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. Approximately 158 respondents are currently subject to the regulation, and our consultations with Agency industry experts regarding the growth rate for the industry indicated that an additional zero respondents per year will become subject to the regulation over the next three years.

It should be noted that the respondents, the industry trade association(s) 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.

3(d) Effects of Less Frequent Collection

The effect of less frequent collection would be a decrease in the margin of assurance that facilities are achieving the emission reductions mandated by the CAA through the promulgation of the applicable regulations. In addition, the likelihood of detecting the poor operation and maintenance of control equipment decreases and the detection of non-compliance becomes problematic.

3(e) General Guidelines

Neither the reporting nor recordkeeping requirements violate the regulations established by Office of Management and Budget (OMB) at 5 CFR part 1320, section 1320.5. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent with the permit program at 40 CFR part 70, 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 the respondent for purposes of determining the appropriate level of enforcement action. Historically, EPA notes that the most flagrant violations have extended beyond a five-year

period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting noncompliance.

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 (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 recordkeeping and reporting requirements do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are facilities that conduct surface coating of metal coils. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3479 that corresponds to the North American Industry Classification System (NAICS) 332812 for Metal Coating, Engraving (Except Jewelry and Silverware), and Allied Services to Manufacturing.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 60, subpart TT.

A source must make the following reports:

Reports for 40 CFR Part 60, Subpart TT	
Construction/reconstruction	60.7(a)(1)
Anticipated startup	60.7(a)(2)
Actual startup	60.7(a)(3)
Initial performance test results	60.8(a), 60.465(b)
Initial performance test	60.8(d), 60.465(b)
Demonstration of continuous monitoring system	60.7(a)(5)
Physical or operational change	60.7(a)(4)

A source must maintain the following records:

Recordkeeping for 40 CFR Part 60, Subpart TT	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Excess emissions report	60.7(c), 60.465(c), 60.465(d)
Monthly performance test of volume-weighted average emissions of VOCs kg/l of coating solids applied	60.463(b), 60.463(c)
Record average VOC content of coatings applied monthly	60.464(a), 60.464(b)
For thermal incineration: install, calibrate, maintain, and operate temperature monitoring device	60.464(c)
Records are required to be retained for 2 years. The first two years of records must be retained at the facility.	60.7(f), 60.465(e)
For catalytic incineration: maintain daily records of upstream and downstream gas temperature	60.465(e)
Maintain daily records of incinerator combustion temperature, or amounts of solvent recovered	60.464(c), 60.465(e)

Electronic Reporting

At the present, many respondents to CAA standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the 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 ten percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance.
Perform initial performance test, Reference Method 24, Reference Method 25, or data provided by the formulator of the coating, 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.

Respondent Activities
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 one or more of 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, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

5(b) Collection Methodology and Management

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or thru an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the Agency or delegated authority.

The results of these evaluations are entered into the Air Facility Subsystem (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 delegated authorities can retrieve and analyze the data.

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., 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 requirements the minimum 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. In the Background Information for the proposed NESHAP^a, 39 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The agency assumes that 39 percent of the 158 facilities affected by this ICR, or 62 facilities, are small entities.

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: New Source Performance Standard (NSPS) - Metal Coil Surface Coating Facilities, 40 CFR part 60, subpart TT (Renewal), 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. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Specific tasks and major assumptions have been identified where appropriate. 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 respondent burden is shown in Table 1. The labor hours in Table 1 are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the standard, 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	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

^a National Emission Standards for Hazardous Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards, U.S. EPA, April 2000, EPA-453/P-00-001.

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "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/Startup and Operation and Maintenance Costs

The types of industry costs associated with the information collection activity in the regulations are labor and Continuous Emission Monitors (CEMs). 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 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 Costs, (B X C)	(E) Annual O&M Cost for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M Costs, (E X F)
Temperature	\$8,000	0	\$0	\$2,100	158	\$331,800

The total capital/startup costs for this ICR is the total of column D.

The total operation and maintenance (O&M) costs for this ICR is the total of column G.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those 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 and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is shown in Table 2: Annual Agency Burden and Cost: New Source Performance Standard (NSPS) – Metal Copil Surface Coating Facilities, 40 CFR part 60, subpart TT (Renewal), attached.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule"

which excludes locality rates of pay.

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

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	158	0	0	158
2	0	158	0	0	158
3	0	158	0	0	158
Average	0	158	0	0	158

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

To avoid double-counting respondents column D is subtracted. The average Number of Respondents over the three-year period of this ICR is shown in column D.

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
Notification of construction/reconstruction	0	1	0	0
Notification of performance test	0	1.2	0	0
Notification of actual startup	0	1	0	0
Report of performance test	0	1.2	0	0
Emissions report	158	2	0	316
Temperature variance report	126	0.5	0	63
			Total	379

The number of Total Annual Responses is shown in column E.

The total annual labor cost may be found in Table 1.

The average annual Agency burden and cost over next three years is shown in Table 2.

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.

(i) Respondent Tally

Details regarding estimates on the total hours requested and the annual labor costs may be found in Table 1. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 41 hours per response.

The total annual capital/startup and O&M costs calculations are detailed in Section 6(b) (iii), Capital/Startup vs. Operation and Maintenance (O&M) Cost.

(ii) The Agency Tally

The average annual Agency burden hours and cost over next three years is shown in Table 2.

6(f) Reasons for Change in Burden

There is no change in burden from the most recently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 41 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2008-0422. 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 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0422 and OMB Control Number 2060-0107 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: NEW SOURCE PERFORMANCE STANDARD (NSPS) - METAL COIL SURFACE COATING FACILITIES, 40 CFR PART 60, SUBPART TT (RENEWAL)

	REPORTING/ RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/ Year (B)	Hours/Year (C=AxB) (C)	Respondents / Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
1.	APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2.	SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3.	REPORTING REQUIREMENTS								
	a. Read Instructions	1	1	1	0	0	0	0	\$0
	b. Required Activities								
	Initial Performance Tests	60	1	60	0	0	0	0	\$0
	Repeat of Performance Tests	60	0.2	12	0	0	0	0	\$0
	c. Gather Existing Information								-----Included in 3b-----
	d. Write Report								
	Notification of Construction/Reconstruction	2	1	2	0	0	0	0	\$0
	Notification of Initial Performance Test	2	1	2	0	0	0	0	\$0
	Notification of Actual Startup	2	1	2	0	0	0	0	\$0
	Report of Performance Test								-----Included in 3b-----
	Emissions Report	5	2	10	158	1,580	79	158	\$146,684
	Temperature Variance Report	4	0.5	2	126	252	12.6	25.2	\$23,395
4.	RECORDKEEPING REQUIREMENTS								
	a. Read Instructions								-----Included in 3a-----
	b. Plan Activities								-----Included in 3b-----
	c. Implement Activities (Monthly Performance Test)	1	12	12	158	1,896	94.8	189.6	\$176,021
	d. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Records of Operating Parameter	0.25	250	62.5	158	9,875	493.8	987.5	\$916,780

TABLE 1: ANNUAL RESPONDENT BURDEN AND COST: NEW SOURCE PERFORMANCE STANDARD (NSPS) - METAL COIL SURFACE COATING FACILITIES, 40 CFR PART 60, SUBPART TT (RENEWAL)

REPORTING/ RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/ Year (B)	Hours/Year (C=AxB) (C)	Respondents / Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
RECORDKEEPING SUBTOTAL					11,771	588.6	1177.1	1,092,801
ANNUAL BURDEN TOTALS					13,603	680.2	1,360	1,262,880
COMBINED TOTALS							15,643	\$1,262,880

Assumptions

Number of facilities 158

Rate of failed performance tests 20%

Percentage of facilities that use incineration 80%

Each plant files an excess emission report every other year and a no exceedance report twice a year.

Assume operation 250 days per year as specified in the NSPS review document.

Technical labor rate \$83.71

Managerial labor rate \$97.46

Clerical labor rate \$42.55

TABLE 2: ANNUAL AGENCY BURDEN AND COST: NEW SOURCE PERFORMANCE STANDARD (NSPS) - METAL COIL SURFACE COATING FACILITIES, 40 CFR PART 60, SUBPART TT (RENEWAL)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (A)	Occurrences /Plant/Year (B)	EPA Hours/Year (C=A*B)	Plants/Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
INITIAL PERFORMANCE TESTS								
New Plant	24	1	24	0	0	0	0	\$0
REPEAT PERFORMANCE TEST								
New Plant	24	0.2	4.8	0	0	0	0	\$0
REPORT REVIEW								
New Plant								
Notification of Construction	2	1	2	0	0	0	0	\$0
Notification of Initial Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Actual Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Initial Test	0.5	1.2	0.6	0	0	0	0	\$0
Review Test Results	8	1.2	9.6	0	0	0	0	\$0
Existing Plant								
VOC Emissions Reports	2	2	4	158	632	31.6	63.2	\$29,464
Temperature Reports	2	0.5	1	126	126	6.3	12.6	\$5,874
SUBTOTAL ANNUAL BURDEN					758	37.9	75.8	\$35,338
GRAND TOTAL						871.7		\$35,338

Assumptions

Number of new plants (per year) 0

Rate of failed performance tests 20%

Percentage of sources that use incineration 80%

Time required to participate with performance test (hours per plant) 24

Time required to review construction notification (hours) 2

Time required to review startup and initial test notifications (hours) 0.5

Time required to review performance test results (hours) 8

Technical labor rate \$56.02

Managerial labor rate \$41.57

Clerical labor rate \$22.50