DEFINITIONS, PARAMETERS, AND ASSUMPTIONS		
Definition	**Value**	**Assumption/Reference**
Facility Info:		
Compliance time for existing facilities (years)	1	
No. of existing facilities to respond	26	
No. of new facilities each year to respond	0	
No. of initial performance tests observed by EPA personnel (assume either performed testing already or will use engineering calculations or perfomance guarantee information for compliance)	0	
Non-Labor (O&M) Costs:		
Pressure drop monitor	$0	Assumed to either have this already or will use engineering calcs.
Capital recovery factor	0.1424	Not needed because no equipment purchase necessary.
Annualized cost	$0	Not needed because no equipment purchase necessary.
Testing contractor cost for initial performance test (Method 5A) of a PM control device	$6,000	Estimate provided by Ray Merrill, Senior Program Manager at ERG Analytical Lab
O&M costs per report	$7.50	Includes photocopying, and postage costs ($0.10/page)(15 pages/report)($0.50/report)
Labor Rates:		
Industry technical hourly rate	$34.49	Labor rate data from Bureau of Labor Statistics (www.bls.org), May 2007 National Industry-Specific Occupational Employment and Wage Estimates for NAICS code 325900. Unloaded rate for technical (health and safety engineer) is $34.49, engineering manager is $52.02, and clerical is $14.95.
Industry managerial hourly rate	$52.02	
Industry clerical hourly rate	$14.95	
Industry scalar for benefits and overhead	120%	Employment cost index (http://www.bls.gov/news.release/eci.t02.htm); percent increase from June 2007 to December 2008)
Industry loaded technical hourly rate	$75.88	
Industry loaded managerial hourly rate	$114.44	
Industry loaded clerical hourly rate	$32.89	
Agency technical hourly rate (GS-12, Step 5)	$32.25	U.S. Office of Personnel Management. Salary Table 2009-GS. Effective January 2009. http://www.opm.gov/flsa/oca/09tables/pdf/gs_h.pdf
Agency managerial hourly rate (GS-15, Step 5)	$53.30	
Agency clerical hourly rate (GS-7, Step 5)	$18.18	
Agency scalar for benefits and overhead	60%	Assumed factor not needed. Discussion on page A-42 of U.S. EPA ICR Handbook (http://www.epa.gov/naaujydh/pages/opportunities/icrhndbk.pdf) is for back-calculating an annual pay rate into an hourly rate.
Agency loaded technical (GS-12, Step 5)	$51.60	
Agency loaded managerial (GS-15, Step 5)	$85.28	
Agency loaded clerical (GS-7, Step 5)	$29.09	

Attachment A - Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Year 1 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Facility per Year (B)	Technical Hours per Facility per Year (C=AxB)	Number of Facilities (D)	Technical Hours per Year (E=CxD)	Management Hours per Year (F=Ex0.05)	Clerical Hours per Year (G=Ex0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	4	1	4	26	104	5.2	10.4	$8,828		b
2. Required activities										
A. Initial performance tests	8	1	8	0	0	0.0	0.0	$0		b, c
B. Engineering calculations or performance guarantees	8	1	8	13	104	5.2	10.4	$8,828		c, d
C. Continuous parameter monitoring	0	0	0	26	0	0.0	0.0	$0		d, e
3. Notification requirements										
A. Initial notification that existing facilities are subject to the standard	4	1	4	26	104	5.2	10.4	$8,828	$195	b, f, i
B. Notifications for new area sources										
(1) Notification of intent to construct/reconstruct	4	0	0	0	0	0.0	0.0	$0		g
(2) Notification of commencement of construction/reconstruction	4	0	0	0	0	0.0	0.0	$0		g
(3) Notification of startup	4	0	0	0	0	0.0	0.0	$0		g
C. Request for compliance extension	4	0	0	0	0	0.0	0.0	$0		h
D. Notification of initial performance tests	2	1	2	0	0	0.0	0.0	$0		b, c
E. Notification of compliance status	4	1	4	26	104	5.2	10.4	$8,828	$195	b, i
4. Recordkeeping requirements										
A. Develop a record system	4	1	4	26	104	5.2	10.4	$8,828		b
B. Develop a monitoring plan	4	1	4	26	104	5.2	10.4	$8,828		b, d
C. Implement activities										
(1) Record performance tests	1	1	1	0	0	0.0	0.0	$0		c
(2) Record periods of target HAP service and deviations	0.50	52	26	26	676	33.8	67.6	$57,385		
(3) Continuous parameter monitoring system inspections, calibration and maintenance	1	12	12	26	312	15.6	31.2	$26,485		d
(4) Vent collection systems and control inspections	1	12	12	26	312	15.6	31.2	$26,485		d
D. Store, file, and maintain records	4	1	4	26	104	5.2	10.4	$8,828		
5. Reporting requirements										
A. Gather information for semi-annual reports	4	2	8	26	208	10.4	20.8	$17,657		
B. Semiannual compliance reports	4	2	8	26	208	10.4	20.8	$17,657	$390	i
6. Train personnel	4	1	4	26	104	5.2	10.4	$8,828		b, j
7. Prepare for and participate in audits	0	0	0	26	0	0.0	0.0	$0		k
TOTALS					2,548	127	255	$216,298	$780	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Industry Burden	2,930	$216,298	$780	$217,078
Total Annualized Capital	0	$0	$0	$0
Summary of O&M	0	$0	$780	$780

[a] Labor costs are based upon the following hourly rates for 2007 from the Bureau of Labor Statistics (Technical $34.49, Management $52.02, and Clerical $14.95) and an index loading factor of 1.2.

[b] One-time activity for each facility in Year 1.

[c] Assumes that 50 percent of the existing facilities do not have existing performance tests that demonstrate compliance with the proposed emission limits, and the other 50 percent will use performance guarantees or engineering calculations to demonstrate compliance.

[d] Assumes all existing facilities will use their existing continuous parameter monitoring equipment to demonstrate continuous compliance.

[e] There is no additional burden for monitoring equipment because add-on control devices are not expected to be needed to demonstrate compliance with the proposed emission limits and facilities are already equipped with equipment to monitor process and existing control device parameters.

[f] Existing facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[g] No new sources are expected in Year 1 following promulgation.

[h] Assumes that compliance extensions will not be necessary.

[i] Non-labor costs include operation and maintenance (O&M) costs for photocopying and mailing reports (assumed to be $7.50 per report).

[j] Based upon training for continuous parameter monitoring system.

[k] Assume audits will not be performed in Year 1 due to limited compliance history.

Attachment A - Table 2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Year 2 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Facility per Year (B)	Technical Hours per Facility per Year (C=AxB)	Number of Facilities (D)	Technical Hours per Year (E=CxD)	Management Hours per Year (F=Ex0.05)	Clerical Hours per Year (G=Ex0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	4	1	4	0	0	0.0	0.0	$0		b
2. Required activities										
A. Initial performance tests	8	1	8	0	0	0.0	0.0	$0		b, c
B. Engineering calculations or performance guarantees	8	1	8	0	0	0.0	0.0	$0		c, d
C. Continuous parameter monitoring	0	0	0	26	0	0.0	0.0	$0		d, e
3. Notification requirements										
A. Initial notification that existing facilities are subject to the standard	4	1	4	0	0	0.0	0.0	$0	$0	b, f, i
B. Notifications for new area sources										
(1) Notification of intent to construct/reconstruct	4	0	0	0	0	0.0	0.0	$0		g
(2) Notification of commencement of construction/reconstruction	4	0	0	0	0	0.0	0.0	$0		g
(3) Notification of startup	4	0	0	0	0	0.0	0.0	$0		g
C. Request for compliance extension	4	0	0	0	0	0.0	0.0	$0		h
D. Notification of initial performance tests	2	1	2	0	0	0.0	0.0	$0		b, c
E. Notification of compliance status	4	1	4	0	0	0.0	0.0	$0	$0	b, i
4. Recordkeeping requirements										
A. Develop a record system	4	1	4	0	0	0.0	0.0	$0		b
B. Develop a monitoring plan	4	1	4	0	0	0.0	0.0	$0		b, d
C. Implement activities										
(1) Record performance tests	1	1	1	0	0	0.0	0.0	$0		c
(2) Record periods of target HAP service and deviations	0.50	52	26	26	676	33.8	67.6	$57,385		
(3) Continuous parameter monitoring system inspections, calibration and maintenance	1	12	12	26	312	15.6	31.2	$26,485		d
(4) Vent collection systems and control inspections	1	12	12	26	312	15.6	31.2	$26,485		d
D. Store, file, and maintain records	4	1	4	26	104	5.2	10.4	$8,828		
5. Reporting requirements										
A. Gather information for semi-annual reports	4	2	8	26	208	10.4	20.8	$17,657		
B. Semiannual compliance reports	4	2	8	26	208	10.4	20.8	$17,657	$390	i
6. Train personnel	4	1	4	0	0	0.0	0.0	$0		j
7. Prepare for and participate in audits	0	0	0	26	0	0.0	0.0	$0		k
TOTALS					1,820	91	182	$154,498	$390	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Industry Burden	2,093	$154,498	$390	$154,888
Total Annualized Capital	0	$0	$0	
Summary of O&M	0	$0	$390	$390

[a] Labor costs are based upon the following hourly rates for 2007 from the Bureau of Labor Statistics (Technical $34.49, Management $52.02, and Clerical $14.95) and an index loading factor of 1.2.

[b] One-time activity for each facility in Year 1.

[c] Assumes that performance tests are not required for any of the existing facilities to demonstrate compliance with the proposed emission limits. The assumption was made that 50 percent of the industry have existing performance tests that demonstrate compliance with the proposed emission limits, and the other 50 percent will use performance guarantees or engineering calculations to demonstrate compliance.

[d] Assumes 50 percent of existing facilities will use their existing continuous parameter monitoring equipment. The remaining 50 percent are assumed to utilize performance guarantees and engineering calculations to establish compliance.

[e] There is no additional burden for monitoring equipment because add-on control devices are not expected to be needed to demonstrate compliance with the proposed emission limits and facilities are already equipped with equipment to monitor process and existing control device parameters.

[f] Existing facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[g] No new sources are expected in Year 1 following promulgation.

[h] Assumes that compliance extensions will not be necessary.

[i] Non-labor costs include operation and maintenance (O&M) costs for photocopying and mailing reports (assumed to be $7.50 per report).

[j] Based upon training for continuous parameter monitoring system.

[k] Assume audits will not be performed in Year 2 due to limited compliance history.

Attachment A - Table 3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Year 3 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Facility per Year (B)	Technical Hours per Facility per Year (C=AxB)	Number of Facilities (D)	Technical Hours per Year (E=CxD)	Management Hours per Year (F=Ex0.05)	Clerical Hours per Year (G=Ex0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	4	1	4	0	0	0.0	0.0	$0		b
2. Required activities										
A. Initial performance tests	8	1	8	0	0	0.0	0.0	$0		b, c
B. Engineering calculations or performance guarantees	8	1	8	0	0	0.0	0.0	$0		c, d
C. Continuous parameter monitoring	0	0	0	26	0	0.0	0.0	$0		d, e
3. Notification requirements										
A. Initial notification that existing facilities are subject to the standard	4	1	4	0	0	0.0	0.0	$0	$0	b, f, i
B. Notifications for new area sources										
(1) Notification of intent to construct/reconstruct	4	0	0	0	0	0.0	0.0	$0		g
(2) Notification of commencement of construction/reconstruction	4	0	0	0	0	0.0	0.0	$0		g
(3) Notification of startup	4	0	0	0	0	0.0	0.0	$0		g
C. Request for compliance extension	4	0	0	0	0	0.0	0.0	$0		h
D. Notification of initial performance tests	2	1	2	0	0	0.0	0.0	$0		b, c
E. Notification of compliance status	4	1	4	0	0	0.0	0.0	$0	$0	b, i
4. Recordkeeping requirements										
A. Develop a record system	4	1	4	0	0	0.0	0.0	$0		b
B. Develop a monitoring plan	4	1	4	0	0	0.0	0.0	$0		b, d
C. Implement activities										
(1) Record performance tests	1	1	1	0	0	0.0	0.0	$0		c
(2) Record periods of target HAP service and deviations	0.50	52	26	26	676	33.8	67.6	$57,385		
(3) Continuous parameter monitoring system inspections, calibration and maintenance	1	12	12	26	312	15.6	31.2	$26,485		d
(4) Vent collection systems and control inspections	1	12	12	26	312	15.6	31.2	$26,485		d
D. Store, file, and maintain records	4	1	4	26	104	5.2	10.4	$8,828		
5. Reporting requirements										
A. Gather information for semi-annual reports	4	2	8	26	208	10.4	20.8	$17,657		
B. Semiannual compliance reports	4	2	8	26	208	10.4	20.8	$17,657	$390	i
6. Train personnel	4	1	4	0	0	0.0	0.0	$0		j
7. Prepare for and participate in audits	0	0	0	26	0	0.0	0.0	$0		k
TOTALS					1,820	91	182	$154,498	$390	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Industry Burden	2,093	$154,498	$390	$154,888
Total Annualized Capital	0	$0	$0	
Summary of O&M	0	$0	$390	$390

[a] Labor costs are based upon the following hourly rates for 2007 from the Bureau of Labor Statistics (Technical $34.49, Management $52.02, and Clerical $14.95) and an index loading factor of 1.2.

[b] One-time activity for each facility in Year 1.

[c] Assumes that performance tests are not required for any of the existing facilities to demonstrate compliance with the proposed emission limits. The assumption was made that 50 percent of the industry have existing performance tests that demonstrate compliance with the proposed emission limits, and the other 50 percent will use performance guarantees or engineering calculations to demonstrate compliance.

[d] Assumes 50 percent of existing facilities will use their existing continuous parameter monitoring equipment. The remaining 50 percent are assumed to utilize performance guarantees and engineering calculations to establish compliance.

[e] There is no additional burden for monitoring equipment because add-on control devices are not expected to be needed to demonstrate compliance with the proposed emission limits and facilities are already equipped with equipment to monitor process and existing control device parameters.

[f] Existing facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[g] No new sources are expected in Year 1 following promulgation.

[h] Assumes that compliance extensions will not be necessary.

[i] Non-labor costs include operation and maintenance (O&M) costs for photocopying and mailing reports (assumed to be $7.50 per report).

[j] Based upon training for continuous parameter monitoring system.

[k] Assume audits will not be performed in Year 3 due to limited compliance history.

Attachment A - Table 4. Summary of Respondent Burden for the Proposed NESHAP for Area Sources (Years 1 through 3): Chemical Preparations Industry

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor (O&M) Costs	Total Costs
1	2,548	127.4	254.8	2,930	$216,298	$780	$217,078
2	1,820	91.0	182.0	2,093	$154,498	$390	$154,888
3	1,820	91.0	182.0	2,093	$154,498	$390	$154,888
Total	6,188	309	619	7,116	$525,294	$1,560	$526,854
Average	2,063	103	206	2,372	$175,098	$520	$175,618

Attachment B - Table 1. Annual Government Burden and Cost of Recordkeeping and Reporting Requirements for Year 1 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Year (B)	Technical Hours per Year (C=AxB)	Management Hours per Year (D=Cx0.05)	Clerical Hours per Year (E=CX0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	2	13	26	1.3	2.6	$1,528		b, c
2. Required activities								
A. Observe initial performance tests	8	0	0	0.0	0.0	$0	$0	c, d, e
B. Review initial performance test reports, performance guarantees, engineering calculations, and operating parameters	4	7	26	1.3	2.6	$1,528		c, e
C. Enter and update information into agency recordkeeping system	1	7	7	0.3	0.7	$382		
3. Excess emissions - enforcement activities	0	0	0	0.0	0.0	$0		f
4. Notification requirements								
A. Review initial notification that existing facilities are subject to the standard	1	26	26	1.3	2.6	$1,528		c, g
B. Notifications for new area sources								
(1) Review notification of intent to construct/reconstruct	4	0	0	0.0	0.0	$0		h
(2) Review notification of commencement of construction/reconstruction	2	0	0	0.0	0.0	$0		h
(3) Review notification of startup	2	0	0	0.0	0.0	$0		h
C. Review request for compliance extension	2	0	0	0.0	0.0	$0		i
D. Review notification of initial performance tests	1	0	0	0.0	0.0	$0		c, d, e
E. Review notification of compliance status	4	7	26	1.3	2.6	$1,528		c, j
5. Reporting requirements - review semiannual compliance reports	4	7	26	1.3	2.6	$1,528		k
TOTALS			137	6.8	13.7	$8,022	$0	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Agency Burden	157	$8,022	$0	$8,022
Total Annualized Capital	0	$0	$0	$0
Summary of O&M	0	$0	$0	$0

[a] Labor costs are based on the following loaded hourly rates for 2009 from the Office of Personnel Management (loading factor = 0.6): Technical $51.60, Management $85.28, and Clerical $29.04.

[b] Facilities subject to the proposed standards are located in 13 States.

[c] One-time only costs.

[d] Assumes EPA technical personnel will review 25% of the performance test and monitoring parameter reports in Year 1.

[e] Assume no emissions tests will need to be performed. Facilities will utilize existing performance tests, performance guarantees, or engineering calculations to demon

[f] Assumes no enforcement activities for Year 1.

[g] Existing area source facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[h] No new sources are expected in Year 1 following promulgation.

[i] Assumes that compliance extensions will not be necessary.

[j] Assumes that EPA technical personnel will review 25% of the initial compliance status notifications in Year 1.

[k] Assumes EPA technical personnel review will 25% of the semiannual compliance reports in Year 1.

Attachment B - Table 2. Annual Government Burden and Cost of Recordkeeping and Reporting Requirements for Year 2 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Year (B)	Technical Hours per Year (C=AxB)	Management Hours per Year (D=Cx0.05)	Clerical Hours per Year (E=CX0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	2	0	0	0.0	0.0	$0		b, c
2. Required activities								
A. Observe initial performance tests	8	0	0	0.0	0.0	$0	$0	c, d, e
B. Review initial performance test reports, performance guarantees, engineering calculations, and operating parameters	4	19	76	3.8	7.6	$4,467		c, e
C. Enter and update information into agency recordkeeping system	1	19	19	1.0	1.9	$1,117		
3. Excess emissions - enforcement activities	0	0	0	0.0	0.0	$0		f
4. Notification requirements								
A. Review initial notification that existing facilities are subject to the standard	1	0	0	0.0	0.0	$0		c, g
B. Notifications for new area sources								
(1) Review notification of intent to construct/reconstruct	4	0	0	0.0	0.0	$0		h
(2) Review notification of commencement of construction/reconstruction	2	0	0	0.0	0.0	$0		h
(3) Review notification of startup	2	0	0	0.0	0.0	$0		h
C. Review request for compliance extension	2	0	0	0.0	0.0	$0		i
D. Review notification of initial performance tests	1	0	0	0.0	0.0	$0		c, d, e
E. Review notification of compliance status	4	19	76	3.8	7.6	$4,467		c, j
5. Reporting requirements - review semiannual compliance reports	4	7	26	1.3	2.6	$1,528		k
TOTALS			197	9.9	19.7	$11,578	$0	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Agency Burden	227	$11,578	$0	$11,578
Total Annualized Capital	0	$0	$0	$0
Summary of O&M	0	$0	$0	$0

[a] Labor costs are based on the following loaded hourly rates for 2009 from the Office of Personnel Management (loading factor = 0.6): Technical $51.60, Management $85.28, and Clerical $29.04.

[b] Facilities subject to the proposed standards are located in 13 States.

[c] One-time only costs.

[d] Assumes EPA technical personnel will review 75% of the performance test and monitoring parameter reports in Year 2.

[e] Assume no emissions tests will need to be performed. Facilities will utilize existing performance tests, performance guarantees, or engineering calculations to demon

[f] Assumes no enforcement activities for Year 2.

[g] Existing area source facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[h] No new sources are expected in Year 2 following promulgation.

[i] Assumes that compliance extensions will not be necessary.

[j] Assumes that EPA technical personnel will review 75% of the initial compliance status notifications in Year 2.

[k] Assumes EPA technical personnel review will 25% of the semiannual compliance reports in Year 2.

Attachment B - Table 3. Annual Government Burden and Cost of Recordkeeping and Reporting Requirements for Year 3 of the Proposed NESHAP for Area Sources: Chemical Preparations Industry

Burden Item	Technical Hours per Occurrence (A)	Number of Occurrences per Year (B)	Technical Hours per Year (C=AxB)	Management Hours per Year (D=Cx0.05)	Clerical Hours per Year (E=CX0.1)	Total Labor Costs per Year[a]	Total Non-Labor (O&M) Costs per Year	Footnotes
1. Read and understand rule requirements	2	0	0	0.0	0.0	$0		b, c
2. Required activities								
A. Observe initial performance tests	8	0	0	0.0	0.0	$0	$0	c, d, e
B. Review initial performance test reports, performance guarantees, engineering calculations, and operating parameters	4	0	0	0.0	0.0	$0		c, e
C. Enter and update information into agency recordkeeping system	1	0	0	0.0	0.0	$0		
3. Excess emissions - enforcement activities	0	0	0	0.0	0.0	$0		f
4. Notification requirements								
A. Review initial notification that existing facilities are subject to the standard	1	0	0	0.0	0.0	$0		c, g
B. Notifications for new area sources								
(1) Review notification of intent to construct/reconstruct	4	0	0	0.0	0.0	$0		h
(2) Review notification of commencement of construction/reconstruction	2	0	0	0.0	0.0	$0		h
(3) Review notification of startup	2	0	0	0.0	0.0	$0		h
C. Review request for compliance extension	2	0	0	0.0	0.0	$0		i
D. Review notification of initial performance tests	1	0	0	0.0	0.0	$0		c, d, e
E. Review notification of compliance status	4	0	0	0.0	0.0	$0		c, j
5. Reporting requirements - review semiannual compliance reports	4	7	26	1.3	2.6	$1,528		k
TOTALS			26	1.3	2.6	$1,528	$0	

	Total Hours	Total Labor Cost	Total Non-Labor Cost	Total Cost
Summary of Agency Burden	30	$1,528	$0	$1,528
Total Annualized Capital	0	$0	$0	$0
Summary of O&M	0	$0	$0	$0

[a] Labor costs are based on the following loaded hourly rates for 2009 from the Office of Personnel Management (loading factor = 0.6): Technical $51.60, Management $85.28, and Clerical $29.04.

[b] Facilities subject to the proposed standards are located in 13 States.

[c] One-time only costs.

[d] Assumes EPA technical personnel will review all of the performance test and monitoring parameter reports in Years 1 and 2.

[e] Assume no emissions tests will need to be performed. Facilities will utilize existing performance tests, performance guarantees, or engineering calculations to demon

[f] Assumes no enforcement activities for Year 3.

[g] Existing area source facilities must submit notification that they are subject to the standard within 120 days of the effective date (in Year 1).

[h] No new sources are expected in Year 3 following promulgation.

[i] Assumes that compliance extensions will not be necessary.

[j] Assumes that EPA technical personnel will review all of the initial compliance status notifications in Years 1 and 2.

[k] Assumes EPA technical personnel review will 25% of the semiannual compliance reports in Year 3.

Attachment B - Table 4. Summary of Government Burden for the Proposed NESHAP for Area Sources (Years 1 through 3): Chemical Preparations Industry

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor (O&M) Costs	Total Costs
1	137	6.8	13.7	157	$8,022	$0	$8,022
2	197	9.9	19.7	227	$11,578	$0	$11,578
3	26	1.3	2.6	30	$1,528	$0	$1,528
Total Burden	360	18	36	413	$21,129	$0	$21,129
Average Burden	120	6	12	138	$7,043	$0	$7,043