

**TABLE 1 Annual Respondent Burden and Cost -**

**NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM)**

**(Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$98.20 (E=C x D) <sup>e</sup>	(F) Management Hours per Year @ \$114.49 (F= E x 0.05) <sup>e</sup>	(G) Clerical Hours per Year @ \$48.53 (G= E x 0.1) <sup>e</sup>	Total Labor Costs per Year
1. APPLICATIONS <sup>a</sup>	17.4	1	17.4	2	34.8	1.7	3.5	\$ 3,783.56
2. SURVEY AND STUDIES	116.5	1	116.5	2	233.0	11.7	23.3	\$ 25,349.88
3. REPORTING REQUIREMENTS								
A. Read Instructions <sup>b</sup>	8.7	1	8.7	52	452.2	22.6	45.2	\$ 49,186.34
B. Required Activities								
Initial performance test <sup>c</sup>	2434.8	1	2434.8	2	4869.6	243.5	487.0	\$ 529,699.00
Demonstration of CMS	N/A	N/A	N/A	N/A	N/A			N/A
Repeat performance test <sup>c, d</sup>	573.9	1	573.9	0.4	229.6	11.5	23.0	\$ 24,971.52
C. Create Information					-----Included in 3b-----			
D. Gather Existing Information					-----Included in 3e-----			
E. Write Report								
Notification of construction/reconstruction	1.7	1	1.7	2	3.5	0.2	0.3	\$ 378.36
Notification of actual startup	1.7	1	1.7	2	3.5	0.2	0.3	\$ 378.36
Notification of initial performance test	35.7	1	35.7	2	71.3	3.6	7.1	\$ 7,756.31
Report of performance test					-----Included in 3b-----			
Excess Emission Reports								
VOC Emission Reports	8.7	4	34.8	52	1808.7	90.4	180.9	\$ 196,745.34
Temperature Reports	26.1	2	52.2	52	2713.0	135.7	271.3	\$ 295,118.01
					Total Reporting Hours by Labor Category			
					4,600	230	460	
						<b>5,290</b>	<b>Hours</b>	<b>\$500,376</b>
4. RECORDKEEPING REQUIREMENTS								
A. Read Instructions	8.7	1	8.7	52	452.2	22.6	45.2	\$ 49,186.34
B. Plan Activities	17.4	1	17.4	52	904.3	45.2	90.4	\$ 98,372.67
C. Implement Activities								
Monthly performance test	1669.6	1	1669.6	52	86817.4	4340.9	8681.7	\$ 9,443,776.42
D. Develop Record System	4347.8	1	4347.8	2	8695.7	434.8	869.6	\$ 945,891.07
E. Time to Enter Information								
Records of Temperature	417.4	1	417.4	52	21704.3	1085.2	2170.4	\$ 2,360,944.11
F. Train Personnel	34.8	1	34.8	52	1808.7	90.4	180.9	\$ 196,745.34
G. Audits	17.4	1	17.4	52	904.3	45.2	90.4	\$ 98,372.67
5. EQUIPMENT & ANALYTICAL EVALUATION EXPENSE								
A. Continuous Monitoring & Evaluation	34.8	1	34.8	35	1217.4	60.9	121.7	\$ 132,424.75
B. Routine Testing and Maintenance	52.2	1	52.2	35	1826.1	91.3	182.6	\$ 198,637.12
C. Systems to Manage Data	34.8	1	34.8	35	1217.4	60.9	121.7	\$ 132,424.75
					Total Recordkeeping Hours by Labor Category			
					131,367	6,568	13,137	
						<b>151,072</b>	<b>Hours</b>	<b>\$ 14,289,766</b>
<b>TOTAL ANNUAL BURDEN</b>						<b>156,362</b>	<b>Hours</b>	<b>\$14,790,142</b>

**Assumptions**

- a. Number of new facilities (per year) = 2
- b. Number of existing affected facilities (per year) = 52
- c. It is assumed the EPA Reference Method 24 test performed on the coatings used by the respondents is generally done by the coatings manufacturers, who provide the test results to the respondents. It is further assumed that the coatings manufacturers routinely perform an EPA Method 24 analysis on their coatings as a quality control measure, so there will be no additional cost incurred by the coatings manufacturers. It is assumed that 0.4 respondents must generate Method 24 data for a coating because they modify the coatings. This situation is assumed to occur once per year.
- d. Rate of failed performance tests = 20%
- e. Technical labor rate (Bureau of Labor Statistics) = \$98.20  
 Managerial Labor rate (Bureau of Labor Statistics) = \$114.49  
 Clerical Labor rate (Bureau of Labor Statistics) = \$48.53

**TABLE 2 Annual Agency Burden and Cost - NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year	(E) Technical Hours per Year @ \$46.21 (E=C x D) <sup>c</sup>	(F) Management Hours per Year @ \$62.27 (F= E x 0.05) <sup>c</sup>	(G) Clerical Hours per Year @ \$25.01 (G= E x 0.1) <sup>c</sup>	Costs per Year
<b>INITIAL PERFORMANCE TESTS</b>								
New Plant <sup>a</sup>	20.9	1.2	25.0	2	50.1	2.5	5.0	\$2,595.73
<b>REPORT REVIEW</b>								
New Plant								
Notification of construction	1.7	1	1.7	2	3.5	0.2	0.3	\$180.26
Notification of initial startup	0.4	1	0.4	2	0.9	0.04	0.1	\$45.06
Notification of actual startup	0.4	1	0.4	2	0.9	0.04	0.1	\$45.06
Notification of initial performance test <sup>b</sup>	0.4	1.2	0.5	2	1.0	0.1	0.1	\$54.08
Review test results <sup>b</sup>	7.0	1.2	8.3	2	16.7	0.8	1.7	\$865.24
Existing Plant								
VOC emission reports	1.7	4	7.0	52	361.7	18.1	36.2	\$18,746.94
Temperature reports	1.7	2	3.5	52	180.9	9.0	18.1	\$9,373.47
<b>TOTAL ANNUAL HOURS</b>					<b>616</b>	<b>31</b>	<b>62</b>	
<b>SALARY BURDEN (per year)</b>								<b>\$31,905.86</b>
<b>ANNUAL TRAVEL EXPENSES<sup>d</sup></b>								
(1 person x 5 plants/year x 3 d/plant x \$75 per diem) + (\$350 round trip/plant x 5 plant/yr) =								\$2,875
<b>TOTAL ANNUAL BURDEN</b>					<b>708</b>		<b>Hours</b>	<b>\$34,781</b>

**Assumptions**

- a. Number of new plants (per year) 2
- b. Rate of failed performance tests 20%
- c. EPA technical labor rate (GS-13 Step 1 x 1.6 for overhead) \$46.21  
     EPA managerial labor rate (GS-12 Step 5 x 1.6 for overhead) \$62.27  
     EPA clerical labor rate (GS-6 Step 3 x 1.6 for overhead) \$25.01
- d. Round trip airfare to visit plant \$350