

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal), EPA ICR Number 2045.04, OMB Control Number 2060-0550

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Automobile and Light-duty Truck Surface Coating were proposed on December 24, 2002, and promulgated on April 26, 2004. These standards apply to facilities that perform surface coating operations on automobiles and light-duty trucks. This information is being collected to assure compliance with 40 CFR part 63, subpart III.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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, in general, are required of all sources subject to NESHAP. Semiannual summary reports are also required.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

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

We have determined that there are an estimated 65 respondents currently subject to this rule. It is estimated that no additional sources will become subject to the standard over the next three years.

All of the automobile and light-duty truck surface coating facilities in the United States are owned and operated by the automobile and light-duty truck surface coating industry (the "Affected Public"). None of the facilities in the United States are owned by state, local, tribal or

the Federal government. They are all privately, owned for-profit businesses. The burden to the “Affected Public” is listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal).

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 EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of HAP. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- (A) Establish and maintain such records; (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from automobile and light-duty truck surface coating operations cause, or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart III.

### **2(b) Practical Utility/Users of the Data**

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to

ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

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

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (75 FR 30813) June, 2010. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. We contacted the Alliance of Automobile Manufacturers, at (202) 326-5500, and American Coatings Association (ACA), at (202) 462-6272.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are automobile and light-duty truck surface coating facilities. The North American Industry Classification System (NAICS) codes are listed below for each source category description.

<b>Standard (40 CFR, part 63, subpart IIII)</b>	<b>NAICS Codes</b>
Automobile Manufacturing	336111
Light Truck and Utility Vehicle Manufacturing	336112
Motor Vehicle Body Manufacturing	336211

#### **4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

##### **(i) Data Items**

In this ICR, all the data recorded or reported is required by the NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.3110(b), 63.5(d), 63.9(b)
Notification of compliance status	63.3110(c), 63.9(h)
Notification of construction/reconstruction	63.3110(a), 63.5
Notification of actual startup	63.3110(a), 63.9(b)
Notification of performance test	63.3110(a), 63.7(b), 63.8(e), 63.9(e)

<b>Notification Reports</b>	
Semiannual report	63.3120(a)
Excess emissions report	63.3120(a)(4-8)
Report of performance test	63.3120(b)
Startup, shutdown, malfunction report	63.3120(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Copies of notifications and reports	63.3130(a)
Material formulation data	63.3130(b)
Records of HAP content calculations	63.3130(c)
Records of names of materials used	63.3130(d)
HAP fractions in each material used	63.3130(e)

<b>Recordkeeping</b>	
Density of materials used	63.3130(f)
Documentation of deviations	63.3130(g)
Startup, shutdown, and malfunction plan/records	63.3130(h), 63.6(e)
Documentation of capture system efficiency determination	63.3130(j)
Documentation of add-on control device destruction or removal efficiency determination	63.3130(k)
Documentation of control device performance test	63.3130(k), 63.10(b)
Determination of capture system and add-on control operating limits and compliance	63.3130(l)
Determination of transfer efficiency	63.3130(m)
Work practice plan/records	63.3130(n)
Records should be retained for 5 years	63.3131(b), 63.10(b)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that approximately 10 percent of the respondents are reporting electronically.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop, for oxidizer, carbon absorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A-F, 311, or ASTM Method D1475-98, D2697-86, D5066-91, D5087-02, D5965-02, D6093-97, D6266-00a test, and repeat performance test 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.

<b>Respondent Activities</b>
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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

### **5(c) Small Entity Flexibility**

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

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 25,190 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

This ICR uses the following labor rates:

Managerial     \$105.86 (\$50.41 + 110%)



Technical	\$92.61 (\$44.10 + 110%)
Clerical	\$45.32 (\$21.58 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, "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 type of industry costs associated with the information collection activities in the subject standard are labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. 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) Cost

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEM	\$16,000	0	\$0	\$1,200	65	\$78,000
Total			\$0			\$78,000

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

The total operation and maintenance (O&M) costs for this ICR are \$78,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$78,000.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such as: the examination of records maintained by the respondents; periodic inspection of sources of emissions; and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$106,900.

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

Managerial	\$58.18 (GS-13, Step 5, \$36.36 + 60%)
Technical	\$43.17 (GS-12, Step 1, \$26.98 + 60%)
Clerical	\$23.36 (GS-6, Step 3, \$14.60 + 60%)

These rates are from the Office of Personnel Management (OPM), 2007 General Schedule, which excludes locality rate of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 65 respondents will be subject to the standard. It is estimated that no new respondents per year will become subject. The overall average number of respondents, as shown in the table below is 65 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents <sup>1</sup>	(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	65	0	0	65
2	0	65	0	0	65
3	0	65	0	0	65
Average	0	65	0	0	65

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 65.

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

<b>Total Annual Responses</b>				
(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 $E=(B \times C)+D$
Initial notification	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	65	2	0	130
Excess emission report	65	2	0	130
Startup, shutdown, malfunction report	16	1	0	16
Total Number of Annual Responses			Total	276

The number of Total Annual Responses is 276.

The total annual labor costs are \$2,243,787. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal).

### **6(e) Bottom Line Burden Hours Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 25,190. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$78,000.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be

2,539 labor hours at a cost of \$106,900. See below Table 2: Annual Agency Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal).

#### **6(f) Reasons for Change in Burden**

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two consideration: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent. Therefore, there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR, and there is no change in burden to industry.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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-2010-0341. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone

number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0341 and OMB Control Number 2060-0550 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 - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(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) Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
a. Read rule and instructions <sup>c</sup>	4	1	4	65	260	13	26	\$26,633
b. Compile and process data <sup>d</sup>	4	4	16	65	1,040	52	104	\$106,532
c. Write reports								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status	2	1	2	0	0	0	0	\$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of performance test <sup>e</sup>	2	1.2	2.4	0	0	0	0	\$0
vi. Report of performance test <sup>e</sup>	10	1.2	12	0	0	0	0	\$0
vii. Semiannual report <sup>f</sup>	6	2	12	65	780	39	78	\$79,899
viii. Excess emissions report <sup>g</sup>	2	2	4	65	260	13	26	\$26,633
ix. Startup, shutdown, malfunction report <sup>h</sup>	2	1	2	16	32	2	3	\$3,278
Subtotal for Reporting Requirements						2,728		
4. Recordkeeping requirements								
a. Read rule and instructions	4	1	4	65	260	13	26	\$26,633
b. Plan activities	12	1	12	65	780	39	78	\$79,899
c. Implement activities	12	1	12	65	780	39	78	\$79,899
d. Maintain record system for material used <sup>i</sup>	20	2	10	65	1,300	65	130	\$133,166
e. Time to enter information								
i. Material usage <sup>j</sup>	0.5	365	183	65	11,863	593	1,186	\$1,215,135
ii. Compliance calculation	2	12	24	65	1,560	78	156	\$159,799
f. Time to train personnel	10	1	10	65	650	33	65	\$66,583
g. Store, file and maintain records <sup>k</sup>	2	12	24	65	1,560	78	156	\$159,799
h. Retrieve records/reports <sup>l</sup>	1	12	12	65	780	39	78	\$79,899
Subtotal for Recordkeeping Requirements						22,462		
					21,905	1,095	2,190	

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(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) Total Cost Per year <sup>b</sup>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						25,190		\$2,243,787

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 65. There will be no new additional sources during the next three years of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$105.86 per hour for Executive, Administrative, and Managerial labor; \$92.61 per hour for Technical labor, and \$45.32 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2006, 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.
- <sup>c</sup> We have assumed that all of the respondents will read the rule and instructions.
- <sup>d</sup> We have assumed that each respondent would take four hours four times per year to compile and process data.
- <sup>e</sup> We have assumed that 20 percent of respondents will be required to repeat the performance test because of failure.
- <sup>f</sup> We have assumed that each respondent will take six hours two times per year to complete the semiannual report.
- <sup>g</sup> We have assumed that each respondents will take two hours two times per year to complete the excess emissions report.
- <sup>h</sup> We have assumed that 25 percent of respondents that use add-on controls, will each take two hours per year to complete the startup, shutdown, malfunction report.
- <sup>i</sup> We have assumed that it will take each respondent twenty hour two times per year to maintain record system for material used.
- <sup>j</sup> We have assumed that each respondents will take 30 minutes 365 times per year to enter information on material usage.
- <sup>k</sup> We have assumed that it will take each respondent two hours twelve times per year to store, file and maintain records.
- <sup>l</sup> We have assumed that it will take each respondent one hours twelve times per year to retrieve records and or reports..

**Table 2: Average Annual EPA Burden - NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal)**

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 <sup>a</sup>	(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, \$ <sup>b</sup>
1. Initial performance test <sup>c</sup>	24	1	24	0	0	0	0	\$0
2. Repeat performance test	24	0.2	4.8	0	0	0	0	\$0
3. Report review								
a. Initial notification	8	1	8	0	0	0	0	\$0
b. Notification of performance test <sup>d</sup>	8	1.2	9.6	0	0	0	0	\$0
c. Notification of compliance status	8	1	8	0	0	0	0	\$0
d. Notification of construction/reconstruction	8	1	8	0	0	0	0	\$0
e. Notification of actual startup	8	1	8	0	0	0	0	\$0
f. Report of performance test <sup>e</sup>	8	1.2	9.6	0	0	0	0	\$0
g. Semiannual report <sup>f</sup>	12	2	24	65	1,560	78	156	\$75,527
h. Excess emissions report <sup>g</sup>	4	2	8	65	520	26	52	\$25,176
i. Startup, shutdown, ,malfunction report <sup>h</sup>	8	1	8	16	128	6.4	12.8	\$6,197
Subtotals Labor Burden and cost					2,208	110	221	\$106,900
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						2,539		\$106,900

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 65. There will be no new additional sources during the next three years of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$58.18 for Managerial (GS-13, Step 5, \$36.36 x 1.6), \$43.17 for Technical (GS-12, Step 1, \$26.98 x 1.6), and \$23.36 for Clerical (GS-6, Step 3, \$14.60 x 1.6). These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 24 hours once per year to complete the initial performance test.



- <sup>d</sup> We have assumed that 20 percent of respondents would have to review notification of performance tests.
- <sup>e</sup> We have assumed that 20 percent of respondents would have to review report of performance test.
- <sup>f</sup> We have assumed that each respondent will take twelve hours two times per year to review semiannual report
- <sup>g</sup> We have assumed that each respondents will take four hours two times per year to review the excess emissions report.
- <sup>h</sup> We have assumed that 25 percent of respondents that use add-on controls, will each take eight hours once per year to review the startup, shutdown, malfunction report.