

## PART A OF THE SUPPORTING STATEMENT

### **1. Identification of the Information Collection**

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

“Aerospace Manufacturing and Rework Industry Information Collection.” This is a new information collection request (ICR). The EPA ICR number 2395.01, and the OMB Control number is 2060-NEW.

#### **1(b) *Short Characterization.***

This information collection survey for aerospace manufacturing and rework facilities was prepared by EPA’s Sector Policies and Programs Division (SPPD) in the Office of Air Quality Planning and Standards (OAQPS), and they are the intended users of the collected data. Respondents are owners or operators of aerospace manufacturing and rework facilities. Aerospace manufacturing and rework was listed as a source category under the Clean Air Act (CAA) on July 16, 1992 (57 FR 31576). The CAA requires that a risk and technology review (RTR) be conducted for this source category by September 1, 2003. This information collection will provide SPPD with the data necessary to conduct the RTR.

This survey was developed specifically for aerospace manufacturing and rework facilities. This information collection has been tailored to the processes at aerospace facilities and uses an electronic submission approach that will be less burdensome for both the facilities that must respond and for EPA personnel who must compile the responses. Respondents are asked to complete simple forms from available information and no request is made to create or develop emission estimates from information in the literature.

Information is requested from approximately 1,000 aerospace manufacturing and rework facilities on general facility information, coatings and spray booth information, other process information (e.g., storage tanks, composite processing, etc.), emission control devices in place and their basic design and operating features, quantity of air emissions, pollution prevention programs at each facility, and information regarding startup and shutdown events. This information is necessary for several purposes. First, EPA will use the information to adequately characterize residual risk at these facilities as required under section 112(f) of the CAA. We will also use the information collected to characterize emissions and control measures for operations not currently regulated, which may include establishing maximum achievable control technology (MACT) floors as required under section 112(d)(3) for these previously unregulated operations. Finally, we will use the information collected to determine whether recent developments in practices, processes, and control technologies warrant revision to the regulations for this source category as required under section 112(d)(6) of the CAA. The information will be collected from the electronic completion of simple forms, which will be compiled to develop a computer database. The completed forms and the computer database will become part of the rulemaking docket.

EPA estimates that there will be roughly 1,000 survey respondents and that they will incur a total burden of 227,700 hours at an estimated cost of \$10,965,834 as a result of this one-time collection. The cost to the Agency is estimated to be approximately \$47,633.

## **2. Need For and Use of the Collection**

### **2(a) *Need/Authority for the Collection.***

The EPA is charged under section 112 of the CAA with developing national emission standards for 189 listed HAP. The Aerospace Manufacturing and Rework Facilities Maximum Achievable Control Technology (Aerospace MACT) standard (40 CFR 63, subpart GG), is a National Emission Standard for Hazardous Air Pollutants (NESHAP) developed under the authority of section 112(d) of the CAA. EPA is required to review each MACT standard and to revise them “as necessary (taking into account developments in practices, processes and control technologies)” no less frequently than every eight years. These reviews are commonly referred to as “technology reviews.” In addition, EPA is required to assess the risk remaining (residual risk) after each MACT standard and promulgate more stringent standards if they are necessary to protect public health. Under EPA’s RTR program, EPA is addressing these two requirements concurrently. EPA is updating the information they currently possess and filling identified data gaps in that information in order to provide a thorough basis for the RTR efforts. The data collection effort will gather additional information to allow comprehensive and technically sound analyses that will form the basis for future rulemaking decisions. The information is being collected under the authority of section 114 of the CAA.

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

The SPPD of the OAQPS uses the information gathered through the survey form to conduct the RTR, on which future rulemaking decisions will be based.

**3. *Nonduplication, Consultations and Other Collection Criteria***

**3(a) *Nonduplication.***

To the best of EPA's knowledge, the data to be collected through this survey is not available elsewhere. A search of EPA's ongoing information collections revealed no duplication of information gathering efforts, and the information that will be requested is not available through other sources, including State regulatory agencies. We searched public information available through State databases, such as title V and new source review permits and permit applications, but found the information to be inadequate for our purposes. For example, the residual risk analysis requires specific emission point information (stack height, stack diameter, exhaust temperature, exhaust velocity, etc.) and development of MACT floors requires detailed information about the solvents, coatings, and cleaning materials used at each facility. We found this type of information to be generally unavailable through the State databases.

In 1994, EPA surveyed aerospace manufacturing and rework facilities to gather information to develop MACT standards for the aerospace industry. That survey was sent to a small portion of the industry and did not ask for information about certain aerospace manufacturing operations and emission source types. In March 2007, we publish an advanced notice of proposed rulemaking (ANPR). The comments received allows us to revise the information for about 125 facilities in our database. However, the database as a whole still contained information for only about 300 of the more than 1,000 known aerospace facilities in the U.S. The current survey does not duplicate the previous survey data collection activities. Furthermore, in response to changes in market conditions and regulatory requirements (such as the revised OSHA hexavalent chromium exposure limit that went into effect in 2006), EPA expects that many aerospace facilities have changed their coatings, enclosed their spray booth operations and reduced HAP

content in solvents since 1994. To the extent that some of the questions in this survey are similar to those in the previous survey, many of the answers that facilities will provide may have changed in the intervening years. Because the current survey will collect different and updated information as compared to the previous survey, the data collected in 1994 does not fulfill EPA's current needs, and the current survey is not duplicative of the previous survey.

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

Pursuant to the Paperwork Reduction Act (PRA) (44 U.S. C 3501 *et seq.*), the EPA notified the public through a *Federal Register* notice (see 75 FR 35454, 6/22/2010) of the Agency's intent to submit the Aerospace Industry Survey ICR to OMB. The notice included a description of the entities to be affected by the proposed survey, a brief explanation of the need for the survey, identification of the statutory authority under which the survey will be issued, and an estimate of burden to be incurred by survey respondents. Through the notice, the Agency requested comments and suggestions regarding the survey and the reduction of data collection burden. A summary of the comments EPA received and EPA's responses are included as an attachment.

**3(c) *Consultations.***

Under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an original or renewal ICR to OMB for review and approval. EPA sent out a letter providing potential respondents with a list of the data elements that will be included in the survey and requested voluntary feedback on these data elements via written communication or by participation in a conference call with EPA. The data elements were provided to the

respondents for informational purposes only, and any response from them was voluntary to help us fine-tune the future data collection effort. This teleconference meeting was held December 18, 2009, at the EPA facilities in Research Triangle Park, NC. The list of data elements is included as Attachment 2 to this supporting statement. The letter was sent to relevant trade organizations and to over 1,200 facilities believed to be aerospace manufacturing or rework facilities. No feedback, either written or at the meeting, was provided by potential respondents directly relating to the data elements of the survey. Approximately 25 facilities did respond to the letter to inform EPA that they were not aerospace manufacturing and rework facilities or were area sources.

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

This survey is to be administered one time only. If this survey is not conducted, the specific data sought in this survey will not be available for EPA's use in decision making about the need for and scope of potential residual risk rules for the aerospace industry.

**3(e) *General Guidelines.***

This information collection complies with the guidelines in 5 CFR 1320.5(d)(2).

**3(f) *Confidentiality.***

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B—Confidentiality of Business Information (CBI) (See 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979.)

**3(g) *Sensitive Questions.***

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

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

##### **4(a) Respondents/NAICS Codes.**

Respondents associated with this information collection are owners or operators of existing aerospace manufacturing and rework facilities. The North American Industrial Classification Codes (NAICS) associated with this industry are presented in Table 1.

**Table 1. North American Industrial Classification Codes for the Aerospace Manufacturing and Rework Industry**

<b>NAICS Code</b>	<b>Description</b>
336411	Aircraft Manufacturing
336412	Aircraft Engine and Engine Parts Manufacturing
336413	Other Aircraft Parts and Auxiliary Equipment Manufacturing
336414	Guided Missile and Space Vehicle Manufacturing

336415	Guided Missile and Space Vehicle Propulsion Units and Propulsion Units Parts Manufacturing
336419	Other Guided Missile and Space Vehicle Parts and Auxiliary Equipment Manufacturing
481111	Scheduled Passenger Air Transportation
481112	Scheduled Freight Air Transportation
481211	Nonscheduled Chartered Passenger Air Transportation
481212	Nonscheduled Chartered Freight Air Transportation
481219	Other Nonscheduled Air Transportation

Approximately 1,000 aerospace manufacturing and rework facilities have been identified to receive this survey. EPA projects a total of about 1,000 responses under this ICR.

**4(b) Information Requested.**

**4(b)(i) Data items, including recordkeeping requirements.** A copy of the survey and instructions are provided as Attachment 1. There are no recordkeeping requirements associated with this request. Information is requested from each respondent on general facility information, coating and spray booth information, other processes (e.g., storage tanks, metal finishing, etc.), air emissions from these booths and other processes, and identification of capture and control devices.

**Part I (Introduction)** provides guidance to the respondent and highlights that no additional monitoring or testing is required to respond to the request. The introduction lists an EPA contact for questions and provides the name and address to which the completed survey should be mailed. Instructions are also provided for submitting the completed form electronically. Finally, an outline of the questionnaire form is provided.

**Part II (Instructions)** provides instructions on how to complete each form in the questionnaire. There are general instructions and instructions specific to each form.



*Form A-1 (Parent Company Information)* asks for information about the parent company, and size of the parent company, in order for EPA to conduct an appropriate economic analysis for this category and evaluate potential small entity impacts.

*Form A-2 (Facility Information)* is where the respondent (facility contact person), company and facility are identified. EPA will use this information to ensure that its facility list is current and accurate, a necessary component of achieving to represent the universe of sources in any analyses. Coordinates are requested, along with a typical operating schedule for the facility. In addition, questions are asked about the products produced at the facility and if the facility is a major source of HAP emissions.

*Form B-1 (Spray Booth Information)* requests data for each spray booth at the facility, including the type of booth, the location coordinates of each booth, and the dimensions of each booth. Information is also requested on the type of particulate filter system used in the booth. Control device information should also be provided.

*Form C-1 and C-2 (Coatings)* are the same form except one requests the information in English units and the other requests the information in metric units. Respondents do not have to fill out both forms, but can fill out whichever one utilizes the data they have easily available. Information is requested on the type of coating, including specialty coatings and the HAP contained in each coating. The forms also include a section for the respondents to identify the spray booth that each coating was applied in and the amount of coating that was applied.

*Form D-1 (Chemical Milling and Metal Finishing Operations)* requests HAP usage and emissions from chemical milling and metal finishing operations at the facility.

Coordinates, dimensions and hours of operation are requested for each tank. Control device and work practice information is also requested.

*Form E-1 (Blast Depainting/Cleaning Operations)* is where the respondent will report HAP emissions from blast depainting and cleaning operations that use blasting methods. In addition to emissions, coordinates, dimensions and hours of operation are also requested. Control device and work practice information should also be recorded on this form.

*Form E-2 (Solvent Depainting Operations)* is where the respondent will report HAP emissions from depainting operations that use solvent materials. The same information is requested (e.g., emissions, coordinates, control device) as in Form E-1.

*Form E-3 (Solvent Cleaning Operations)* requests information on HAP emissions from solvent cleaning operations such as hand-wipe cleaning of aerospace components, cleaning of spray guns and cleaning of spray booths. In addition to HAP emissions, information is requested on location coordinates, building dimensions, control devices and work practices.

*Form E-4 (Solvent Cleaning Operations)* requests information similar to that requested on Form E-3, except that only cleaning operations subject to the Halogenated Solvent Cleaning NESHAP (40 CFR 63, subpart T) should be reported. Even though halogenated solvent cleaning operations are not subject to the aerospace NESHAP, the EPA is concerned that some aerospace facilities may have mistakenly reported emissions from these operations as emissions from operations subject to the aerospace NESHAP in part reporting to state or local agencies. In order to estimate the residual risk accurately from each of these categories, the EPA is attempting to first develop accurate emissions

estimates. The respondents' efforts to properly report halogenated solvent cleaning operations on Form E-4 and not on Form E-3 will play an important role in the EPA's development of emissions estimates from these two categories.

*Form F-1 and F-2 (Composite Processing Operations)* are the same form except one requests the information in English units and the other requests the information in metric units. Respondents do not have to fill out both forms, but can fill out whichever one utilizes the data they have easily available. Information is requested on the type of resins used in composite processing operations, the total volume of resin used and information related to the spray booth used to apply the resins.

*Form G-1 (Storage Tanks)* is where the respondent will provide HAP emissions from storage tanks used to store materials used in aerospace manufacturing and rework operations. The type of tank, the coordinates of the tank, the dimensions of the tank, the HAP component of the material in the tank and control device information are all requested.

*Form H-1 (Wastewater Treatment Operations)* requests information on wastewater treatment operations as they pertain to aerospace manufacturing and rework operations. The coordinates, dimensions, hours of operation, HAP emissions and control device information are all requested.

*Form I-1 (Startups and Shutdowns)* provides examples of startup and shutdown events that would be reported on this form. Information on this form is requested if it is readily available. Additional testing or data gathering is not required to complete this form for startup and shutdown events.

*Forms J-1 to J-11 (Air Pollution Control Devices)* provide a form for each control device likely to be in use at aerospace manufacturing and rework facilities. If an air pollution control device is not in use at the facility, the relevant form does not need to be filled out. The information requested for these forms should be readily available. No additional testing or data gathering is required in order to complete these forms.

*Form K-1 (Air Pollution Control Device Costs)* is where the respondent will enter readily available information related to the cost of each air pollution control device for which information was provided in Forms J-1 to J-11.

**4(b)(ii) Respondent activities.** The survey will be sent to each aerospace manufacturing and rework facility, who will be asked to complete and return the survey instrument. Completion of the survey involves the following steps:

- **Reviewing instructions:** Respondents will need to read the instructions for the survey;
- **Search data sources:** Respondents may need to consult records and review facility information, in addition to gathering available data from files, regarding coating usage, booth types, and other requested information prior to completing the survey;
- **Complete and review the collection of information:** Respondents will need to complete the survey and review their answers; and
- **Transmit or otherwise disclose the information:** Respondents will need to return the completed survey to EPA.

The request does not require respondents to make measurements of emissions or otherwise create information, and it relies on information that should be readily available

to the respondent. Consequently, it is consistent and compatible with existing reporting and recordkeeping requirements because the survey asks only for this existing information. There is no need for respondents to develop or acquire technology or systems to collect, process or disclose the information.

Non-respondents will receive up to two reminder calls encouraging them to participate. If EPA decides to issue subpoenas because it does not receive a sufficient response rate to accurately characterize the industry, the initial non-respondents will need to review the subpoena, as well as following the steps outlined above. Section 113 of the CAA allows EPA to assess a fine of up to \$25,000 per day for failure to respond to this information request.

This questionnaire asks for readily obtainable information, e.g., information known or easily accessible by technical, managerial or supervisory employees of the facility who are responsible for manufacturing, processing, technical services or marketing. The facility does not need to generate new information to complete the survey.

The collection will be a one-time event, and there will be no requirement for respondents to maintain records to support their responses. However, EPA is suggesting that respondents keep a copy of the completed questionnaire for their files in case the Agency contacts them with any follow-up questions after reviewing their responses.

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

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

Agency activities associated with the information collection include preparing the questionnaire, answering respondent questions about the questionnaire, reviewing data

submissions, addressing requests for confidentiality and compiling the data into a database.

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

Data collection will be accomplished using an electronic survey tool. Recipients of the letter announcing the survey's availability will be directed to an EPA web page to download the files. The respondent will be asked to complete and return the survey within a three-month timeframe. Respondents will be encouraged to complete an electronic copy of the survey and upload it to the EPA web page, which reduces transcription errors when EPA processes the responses. Non-respondents will receive up to two reminder calls encouraging them to participate. The web page will also have instructions on how to submit data that is CBI.

A written survey is being used because some of the information EPA is requesting may require the respondent to consult records or other documents at the facility, which would be difficult to do during a telephone survey given the type of information requested and the number of potential respondents. In addition, the written survey method will allow the respondent to complete the survey at his or her convenience. Electronic transmission of the empty and completed survey forms will lead to more efficient data collection, both in terms of reducing mailing costs and paper usage and reducing transcription errors. The survey has been designed to be easily compiled into a database upon receipt of the completed survey files.

For this information collection, the submissions will be monitored for completeness, and follow-up calls will be made to maximize the response rate. Confidential information will be maintained in secure locations as required by procedures

for handling CBI. Confidential Business Information will not be entered into the computer database. Public access to non-CBI information will be provided through the rulemaking docket, which will contain the survey responses and a copy of the resulting database.

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

EPA has identified a list of roughly 1,000 U.S. facilities with aerospace manufacture or rework operations. Some of these manufacturers are small businesses as defined by the Small Business Administration's size standards. EPA considered collecting data from only a sample of manufacturers, but determined that a census (a survey administered to the entire population of aerospace manufacturing and rework facilities, including small businesses) is appropriate. Because the industry is composed of a number of different sectors (military, commercial, and private aircraft; original equipment manufacturing; rework operations; commercial facilities; military facilities) and the wide variety of products produced within each of these sectors, we determined that it was not possible to adequately characterize the unique processes of each sector through representative sampling. Nor could we simply request information only from the facilities for which the risk review had already indicated a potentially higher than acceptable risk level. These facilities did not include all manufacturing operations present throughout the aerospace industry, nor did they include all of the HAP that are known to be emitted by the industry. Additionally, surveying only the higher risk facilities would not provide adequate information for the technology review. Therefore, we determined that a census is required to more accurately characterize the industry as a whole. EPA needs to include small businesses in the survey so that it can better estimate

potential small business impacts in the event the Agency ultimately decides to proceed with a regulatory action.

In developing the information request, SPPD considered whether a separate request or no request for information should be made to small facilities. A major consideration was that the burden of responding to the questionnaire is not excessive for small facilities. Because they have fewer and simpler processes, smaller facilities will require less time to prepare a response than larger facilities. The information requested from the smaller facilities should be readily available and no requests are made to perform measurements or create information.

Many of the aerospace manufacturing and rework facilities meet the definition of small business (e.g., companies with fewer than 1,000 or 1,500 employees total at all facilities for facilities in NAICS 2-digit code 33, and companies with less than \$7 million in annual average receipts for facilities in NAICS 2-digit code 48), and information from small entities is important to this regulatory development. The information collected from small entities will improve the analyses that must be performed to assess the economic impact of a potential MACT standard on them. A Regulatory Flexibility Analysis must be performed under the Regulatory Flexibility Act of 1980 if a proposed regulation will have a significant economic impact on a substantial number of small entities. The information from small entities will also assist in addressing the requirements of the Small Business Regulatory Enforcement Fairness Act of 1996.

Although many of these small businesses are not likely to be major sources of HAP emissions, information on emissions and the level of control performance achieved is needed from all facilities in the industry to determine with reasonable accuracy the



“average emission limitation achieved” by the top-performing 12 percent of sources. The coverage of small facilities is especially important if any are in this top 12 percent.

In addition, the best controlled sources may include some of the smaller facilities, which would affect the determination of MACT for new aerospace facilities. Information on smaller facilities will aid in determining if a facility size cutoff is warranted, and if so, which of the smaller facilities should be exempt from the MACT standard. The information on small facilities will also provide insight into pollution prevention measures that might be applicable to larger facilities. Even if the smaller facilities are not major sources, the information from their responses to the survey will be useful in determining if they are significant area sources that may warrant regulation.

**5(d) *Collection Schedule.***

The proposed mailing date for the survey is January 31, 2011. The respondents are given two months to reply, with March 28, 2011 being the anticipated date when all data is available for analysis by EPA. The data will be used to develop residual risk standards, if warranted, with proposal targeted for August 2011 and promulgation in June 2012.

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

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

EPA will request that all U.S. aerospace manufacturing and rework facilities complete the questionnaire forms. Each section of the questionnaire is expected to be completed by technical and clerical staff and reviewed by managerial staff. Respondent activities include reading the cover letter and downloading the forms, reading the instructions, gathering data, manipulating data for entry into the forms, entering data into the forms and uploading the forms. The exhibit reflects the assumption that technical and clerical staff will devote their time to reading instructions, gathering information, completing the questionnaire forms and transmitting the information; managerial staff will devote their time to reading instructions and reviewing questionnaire responses.

Table 2 presents the average number of hours required for each task for respondents of three sizes: small, medium and large. Due to the wide range in sizes of aerospace facilities, it was necessary to estimate the burden for each size of facility. Based on the industry's facility size breakdown contained in the proposal *Background Information Document* for the Aerospace NESHAP, it is assumed that 84 percent of the respondents are small facilities, 14 percent are medium facilities and two percent are

large facilities. There are approximately 1,000 respondents expected to complete the questionnaire.

A typical small-size facility respondent is estimated to need an average of 175 hours to complete the questionnaire, while a typical medium-size facility respondent is estimated to need an average of 300 hours to complete the questionnaire and a typical large-size facility respondent is estimated to need an average of 450 hours to complete the questionnaire. These burden estimates include technical, management and clerical hours. Table 3 presents the burden estimate for small-size facilities, while Table 4 presents the burden estimate for medium-size facilities and Table 5 presents the burden estimate for large-size facilities. These unit burden estimates are average values. As with any average, some respondents will be above the average and others will be below.

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

The information collection activities and estimated costs for all respondents are presented in Tables 3, 4, and 5. The costs are based on hourly rates estimated as follows: technical at \$49.80/hr, management at \$62.08/hr and clerical at \$24.79/hr. For a typical small-size facility respondent, the costs are estimated as \$9,692 (175 hours), while for a typical medium-size facility respondent the costs are estimated as \$16,615 (300 hours), and for a typical large-size facility the costs are estimated as \$24,922 (450 hours). There are no capital or operation and maintenance costs. A summary of the burden and costs for all respondents is presented in Table 6.

**6(c) *Estimating Agency Burden and Cost.***

The costs the federal government would incur would be for preparing the questionnaire, answering respondent questions about the questionnaire, reviewing data

submissions, addressing requests for confidentiality and compiling the data into a database. The burden estimate is presented in Table 7 at the end of this supporting statement. Hourly labor rates were taken from the Office of Personnel Management Salary Table 2010-GS (effective January 2010) and are as follows: technical (GS-12, Step 5) at \$32.73/hour, management (GS-15, Step 5) at \$54.10/hr, and clerical (GS-5, Step 5) at \$14.90/hr. The total costs for the Agency are estimated as \$47,633.

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

For small-size facilities, the total burden shown in Table 3 is estimated as 7,350 management hours, 147,000 technical hours and 14,700 clerical hours at a cost of \$8,141,301. The total burden and costs are based on 840 small-size aerospace facilities completing the survey.

For medium-size facilities, the total burden shown in Table 4 is estimated as 2,100 management hours, 42,000 technical hours and 4,200 clerical hours at a cost of \$2,326,086. The total burden and costs are based on 140 medium-size aerospace facilities completing the survey.

For large-size facilities, the total burden shown in Table 5 is estimated as 450 management hours, 9,000 technical hours and 900 clerical hours at a cost of \$498,447. The total burden and costs are based on 20 large-size aerospace facilities completing the survey.

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

**6(e)(i) *Respondent tally.*** The total respondent burdens are given in Table 6 and are estimated as 169,050 hours and \$8,141,301 for small-size respondents, 48,300 hours and \$2,326,086 for medium-size respondents and 10,350 hours and \$498,447 for large-

size respondents. For all respondents, the total burden is estimated as 227,700 hours and \$10,965,834.

**6(e)(ii) The Agency tally.** The total Agency burden is given in Table 7 and is estimated as 1,483.5 hours and \$47,633.

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

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

This is a new information collection requesting information from approximately 1,000 aerospace manufacturing and rework facilities necessary for EPA to adequately characterize residual risk at these facilities, to characterize emissions and control measures for operations not currently regulated, and to develop standards for new and existing aerospace facilities under section 112 of the CAA, if appropriate.

**6(g) Burden Statement.**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 228 hours per response. Burden means the total time, effort or financial resources expended by persons to generate, maintain, retain or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install and utilize technology and systems for the purposes of collecting, validating and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 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-OAR-2004-0450, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID EPA-HQ-OAR-2004-0450 and OMB Control Number 2060-NEW in any correspondence.

**TABLE 2. ESTIMATED RESPONDENT BURDEN FOR THE AEROSPACE ICR**

Task	Technical Labor Hours by Facility Size		
	Small	Medium	Large
Read cover letter/download forms	0.75	0.75	0.75
Read instructions	1.50	1.50	1.50
Gather data	120.00	200.00	300.00
Manipulate data for entry into forms	48.25	85.25	127.25
Enter data into forms	4.00	12.00	20.00
Upload forms	0.50	0.50	0.50
<b>TOTAL TECHNICAL LABOR HOURS</b>	175	300	450

**TABLE 3. ANNUAL RESPONDENT BURDEN AND COST FOR SMALL FACILITIES**

Burden Item	(A) Person hours per respondent <sup>a</sup>	(B) Number of respondents	(C) Technical person hours (C = A x B)	(D) Management person hours (0.05 x C)	(E) Clerical person hours (0.1 x C)	(F) Cost <sup>b</sup> (\$)
Read cover letter/download forms	0.75	840	630	32	63	34,891
Read instructions	1.50	840	1,260	63	126	69,783
Gather data	120.00	840	100,800	5,040	10,080	5,582,606
Manipulate data for entry into forms	48.25	840	40,530	2,027	4,053	2,244,673
Enter data into forms	4.00	840	3,360	168	336	186,087
Upload forms	0.50	840	420	21	42	23,261
<b>TOTAL LABOR BURDEN AND COST</b>	175	n/a	147,000	7,350	14,700	8,141,301

<sup>a</sup> See values in Table 2.

<sup>b</sup> Costs were taken from the Bureau of Labor Statistics, National Compensation Survey, Employer Costs for Employee Compensation Supplementary Tables December 2007. Supplementary Table 2 – Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers in manufacturing industries, by occupational group, establishment size and bargaining status. December 2007. Available on-line at <http://www.bls.gov/ect>. The cost for technical person hours is \$49.80/hour, taken from the total compensation value for the “professional and related” occupational group. The cost for management person hours is \$62.08/hr, taken from the total compensation value for the “management, business and financial” occupational group. The cost for clerical person hours is \$24.79/hr, taken from the total compensation value for the “office and administrative support” occupational group.



**TABLE 4. ANNUAL RESPONDENT BURDEN AND COST FOR MEDIUM FACILITIES**

Burden Item	(A) Person hours per respondent <sup>a</sup>	(B) Number of respondents	(C) Technical person hours (C = A x B)	(D) Management person hours (0.05 x C)	(E) Clerical person hours (0.1 x C)	(F) Cost <sup>b</sup> (\$)
Read cover letter/download forms	0.75	140	105.0	5.3	10.5	5,815
Read instructions	1.50	140	210.0	10.5	21.0	11,630
Gather data	200.00	140	28,000.0	1,400.0	2,800.0	1,550,724
Manipulate data for entry into forms	85.25	140	11,935.0	596.8	1,193.5	660,996
Enter data into forms	12.00	140	1,680.0	84.0	168.0	93,043
Upload forms	0.50	140	70.0	3.5	7.0	3,877
<b>TOTAL LABOR BURDEN AND COST</b>	300	n/a	42,000	2,100	4,200	2,326,086

<sup>a</sup> See values in Table 2.

<sup>b</sup> Costs were taken from the Bureau of Labor Statistics, National Compensation Survey, Employer Costs for Employee Compensation Supplementary Tables December 2007. Supplementary Table 2 – Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers in manufacturing industries, by occupational group, establishment size and bargaining status. December 2007. Available on-line at <http://www.bls.gov/ect>. The cost for technical person hours is \$49.80/hour, taken from the total compensation value for the “professional and related” occupational group. The cost for management person hours is \$62.08/hr, taken from the total compensation value for the “management, business and financial” occupational group. The cost for clerical person hours is \$24.79/hr, taken from the total compensation value for the “office and administrative support” occupational group.

**TABLE 5. ANNUAL RESPONDENT BURDEN AND COST FOR LARGE FACILITIES**

Burden Item	(A) Person hours per respondent <sup>a</sup>	(B) Number of respondents	(C) Technical person hours (C = A x B)	(D) Management person hours (0.05 x C)	(E) Clerical person hours (0.1 x C)	(F) Cost <sup>b</sup> (\$)
Read cover letter/download forms	0.75	20	15.0	0.8	1.5	830.75
Read instructions	1.50	20	30.0	1.5	3.0	1,661.49
Gather data	300.00	20	6,000.0	300.0	600.0	332,298.00
Manipulate data for entry into forms	127.25	20	2,545.0	127.3	254.5	140,949.74
Enter data into forms	20.00	20	400.0	20.0	40.0	22,153.20
Upload forms	0.50	20	10.0	0.5	1.0	553.83
<b>TOTAL LABOR BURDEN AND COST</b>	450	n/a	9000	450	900	498,447

<sup>a</sup> See values in Table 2.

<sup>b</sup> Costs were taken from the Bureau of Labor Statistics, National Compensation Survey, Employer Costs for Employee Compensation Supplementary Tables December 2007. Supplementary Table 2 – Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers in manufacturing industries, by occupational group, establishment size and bargaining status. December 2007. Available on-line at <http://www.bls.gov/ect>. The cost for technical person hours is \$49.80/hour, taken from the total compensation value for the “professional and related” occupational group. The cost for management person hours is \$62.08/hr, taken from the total compensation value for the “management, business and financial” occupational group. The cost for clerical person hours is \$24.79/hr, taken from the total compensation value for the “office and administrative support” occupational group.

**TABLE 6. SUMMARY OF ESTIMATED RESPONDENT BURDEN FOR THE AEROSPACE ICR**

	Value by Facility Size		
	Small	Medium	Large
Total Number of Respondents	840	140	20
Total Labor Hours	169,050	48,300	10,350
Labor Hours Per Respondent	175	300	450
Total Labor Cost (\$)	8,141,301	2,326,086	498,447
Labor Cost Per Respondent (\$)	9,692	16,615	24,922

**TABLE 7. ANNUAL BURDEN AND COST FOR THE FEDERAL GOVERNMENT**

Burden Item	(A) EPA Hrs/Occurrence	(B) Contractor Hrs/Occurrence	(C) Number of Occurrences	(D) Total EPA Hrs (AxC)	(E) Total Contractor Hrs (BxC)	(F) Total Hrs (D+E) <sup>c</sup>
Develop survey and industry mailing list	50.0	350.0	1	50.0	350.0	400.0
Distribute survey	40.0	0.0	1	40.0	0.0	40.0
Answer questions <sup>a</sup>	0.1	0.25	200	20.0	50.0	70.0
Audit/review submissions	0.25	0.1	1000	250.0	100.0	350.0
Enter into database/QA check	0.0	0.3	1000	0.0	300.0	300.0
Analyze submissions and summarize results	0.0	80.0	1	0.0	80.0	80.0
Respond to requests for confidentiality <sup>b</sup>	0.3	0.2	100	30.0	20.0	50.0
<b>TOTAL LABOR BURDEN AND COST</b>	n/a	n/a	n/a	390.0	900.0	1,290.0

<sup>a</sup> It is assumed that questions will need to be answered for 20 percent of the respondents.

<sup>b</sup> It is assumed that responses to requests for confidentiality will be needed for 10 percent of the respondents.

<sup>c</sup> For the purposes of the cost calculations in this table, it is assumed that EPA and Contractor hours for technical, management, and clerical positions cost the same amount.

**TABLE 7. ANNUAL BURDEN AND COST FOR THE FEDERAL GOVERNMENT (cont.)**

Burden Item	(G) Technical person hours (=F) (GS12)	(H) Management person hours (G x 0.05) (GS15)	(I) Clerical person hours (G x 0.1) (GS5)	(J) Cost <sup>d</sup> (\$)
Develop survey and industry mailing list	400.0	20.0	40.0	14,770.00
Distribute survey	40.0	2.0	4.0	1,477.00
Answer questions <sup>a</sup>	70.0	3.5	7.0	2,584.75
Audit/review submissions	350.0	17.5	35.0	12,923.75
Enter into database/QA check	300.0	15.0	30.0	11,077.50
Analyze submissions and summarize results	80.0	4.0	8.0	2,954.00
Respond to requests for confidentiality <sup>b</sup>	50.0	2.5	5.0	1,846.25
<b>TOTAL LABOR BURDEN AND COST</b>	<b>1,290.0</b>	<b>64.5</b>	<b>129.0</b>	<b>47,633.25</b>

<sup>d</sup> Costs were taken from the U.S. Office of Personnel Management, Salary Table 2010-GS, effective January 2010, available on-line at [http://www.opm.gov/oca/10tables/html/gs\\_h.asp](http://www.opm.gov/oca/10tables/html/gs_h.asp). All hourly rates are baseline values. It was assumed that the technical person is a GS-12, Step 5 employee with a rate of \$32.73 per hour, that the management person is a GS-15, Step 5 employee with a rate of \$54.10 per hour, and that the clerical person is a GS-5, Step 5 employee with a rate of \$14.90 per hour.