

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plating and Polishing Area Sources (40 CFR Part 63, Subpart WWWWWW)
(Renewal)**

1.0 Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Plating and Polishing Area Sources (40 CFR Part 63, Subpart WWWWWW)
(Renewal), EPA ICR number 2294.03, OMB Control Number 2060-0623.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous air Pollutants (NESHAP) for Plating and Polishing Area Sources (40 CFR Part 63 Subpart WWWWWW), were proposed on March 14, 2008 (73 FR 14126), promulgated on July 1, 2008 (73 FR 37728), and amended on June 20, 2011 (76 FR 32005) and September 19, 2011 (76 FR 57913). These regulations apply to owners or operators of any existing or new plating and polishing facility that is an area source of hazardous air pollutants (HAP) emissions and uses one or more of the following metal HAP: cadmium, chromium, lead, manganese, or nickel (hereafter referred to as the plating and polishing metal HAP). This information is being collected to assure compliance with 40 CFR part 63, subpart WWWWWW.

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

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file onsite 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.

Over the next three years, an average of 2,900 respondents per year will be subject to the standard, and no additional respondent per year will become subject to the standard. The affected sources at plating and polishing facilities includes all plating and polishing tanks that contain one or more of the plating and polishing metal HAP; thermal spraying operations that use one or more of the plating and polishing metal HAP; and dry mechanical polishing operations that emit one or more of the plating and polishing metal HAP.

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

The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWWWW) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Table 2: Average Annual EPA Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWWWW) (Renewal).

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 (CAA), as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, Section 114(a) states that the Administrator may require any owner/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 plating and polishing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart WWWWWW.

2(b) Practical Utility/Users of the Data

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

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 check if the leaks are being detected and repaired and the standard is being met.

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.

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. 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 (76 FR 26900) on May 9, 2011. 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 EPA's 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 and the standard has been previously reviewed to determine the minimum information needed for compliance purpose. In developing this ICR, we contacted the Wisconsin Department of Natural Resources at (608) 264-6153 and the National Association for Surface Finishing at (202) 457-0630. In this case, one comment was received indicating that the respondent universe might be underestimated, however, no alternative estimates were provided. In response to this comment, EPA reviewed the respondent universe in OTIS. The respondent universe obtained from OTIS was not greater than the number of respondents estimated in this ICR; therefore, no changes were made.

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

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 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 requirements 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 five years. In addition, 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 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of plating and polishing operations. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standard, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below for plating and polishing operations.

Standard (40 CFR Part 63, Subpart WWWWWW)	SIC Codes	NAICS Codes
Hardware Manufacturing	3429/3499	33251
Commercial Gravure Printing	2754/2771	323111
Metal Stamping	3469	332116
Bolt, Nut, Screw, Rivet, and Washer Manufacturing	3429/3452	332722
Metal Heat Treating	3398	332811
Metal Coating, Engraving (except jewelry and silverware), and Allied Services to Manufacturers	3479	332812
Plumbing Fixture Fitting and Trim Manufacturing	3432	332913
Other Metal Valve and Pipe Fitting Manufacturing	3429/3432/3494/3499	332919
All Other Miscellaneous Fabricated Metal Product Manufacturing	3291/3429/3432/3494/ 3497/3499/3537/3599/ 3914/3999	332999
Bare Printed Circuit Board Manufacturing	3672	334412
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Jewelry (except costume) Manufacturing	3479/3911	339911

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Plating and Polishing Area Sources (40 CFR Part 63, Subpart WWWWWW).

A source must make the following reports:

Notifications	
Notification of applicability	40 CFR 63.9(a)(2)
Notification of construction/reconstruction	40 CFR 63.9(b)(5)
Notification of special compliance requirements	40 CFR 63.9(d)
Notification of performance test	40 CFR 63.9(e)
Notification of opacity/VE observations	40 CFR 63.9(f)
Additional CMS notifications	40 CFR 63.9(g)
Notification of compliance status	40 CFR 63.9(h)
Notification of changes in information	40 CFR 63.9(j)

Reports	
Startup, shutdown, or malfunction (SSM) plan	40 CFR 63.6(e)(3)
Performance test plan	40 CFR 63.7(c)(2)
CMS quality control plan	40 CFR 63.8(d)
CMS performance evaluation test plan	40 CFR 63.8(e)(3)

A source must keep the following records:

Recordkeeping	
Records of notifications	40 CFR 63.10
Records that demonstrate continuous compliance	40 CFR 63.10
Monitoring/inspection information	40 CFR 63.10
Reports of deviations	N/A
Semiannual monitoring reports	N/A
Initial/repeat performance tests	40 CFR 63.7(e)(1)/ 40 CFR 63.6(h)(7)
Quality assurance test plan	40 CFR 63.7(c)
CMS performance evaluation/report	40 CFR 63.8(e)(5)
SSM reports	40 CFR 63.6(e)(3)
Excess emissions reports	40 CFR 63.10(e)(3)
Annual compliance certifications	N/A

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
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.
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 instruction 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 and reporting equipment that provide 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.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS, which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's 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 and its delegated authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/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 in Table 1: Annual Respondent Burden and Cost - NESHP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (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 33,108 (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

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$121.42 (\$57.82 + 110%)
Technical	\$99.14 (\$47.21 + 110%)
Clerical	\$49.81 (\$23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "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 (O&M) Costs

The type of industry costs associated with the information collection activities in the subject standard are both 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) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Recordkeeping	(B) Capital/Startup Cost for One Respondent	(C) Number of Respondents ^a	(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)
Standard 4-drawer File Cabinet	\$25.80	322.22	\$8,314 ^b	\$0	322	\$0

^a Assumes one standard four-drawer file cabinet for one-third of the 2,900 facilities, or an average of 2,900/3/3=322 file cabinets per year required to maintain records at a cost of \$235 per cabinet. The annualized cost per cabinet is \$25.80.

^b Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = i \times (1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years). CRF = 0.1098. Cabinets are assumed to have a 15-year life, 7% interest. The total capital/startup costs for the 15-year period is \$75,722.

The total capital/startup costs for this ICR are \$8,314. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs consists of photocopying, and postage are \$0. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to the industry over the next three years of the ICR is estimated to be \$8,314.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, 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 \$160,287.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality, rates 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 and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (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 2,900 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
One-time initial notification	967	1	N/A	967
One-time notification of compliance status	967	1	N/A	967
Annual compliance certification	48	1	N/A	48
Report of deviation	48	1	N/A	48
			Total	2,030

The number of total annual responses is 2,030 per year.

The total annual labor costs are \$3,172,379. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent tally

The total annual labor hours are 33,108. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$8,314.

(ii) The Agency tally

The average annual Agency burden and cost over the next three years is estimated to be 3,557 labor hours at a cost of \$160,287. See Table 2: Average Annual EPA Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease in the total hours as currently identified in the OMB Inventory of Approved Burdens due to a mathematical error in determining the person hours per respondent in the previous ICR. There is an increase in labor costs. This is not due to any program changes. The change in the cost estimates occurred due to adjustments in labor rates for both respondents and the Agency.

6 (g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 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 valid OMB Control Number. The OMB Control Numbers for EPA 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 suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OECA-2011-0233, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket is (202) 566-1752. An electronic version of the public docket is available at <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 one of the Docket ID Numbers 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, DC 20503, Attention Desk Officer for EPA. Please include the relevant Docket ID Number EPA-HQ-OECA-2011-0233 and OMB Control Number 2060-0623 in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with the final rule.

Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions ^b	4	1	4	967	3,868	193.4	386.8	\$426,227.68
B. Required activities								
Initial Notification of applicability ^c	2	1	2	967	1,934	96.7	193.4	\$213,113.84
Notification of Compliance Status ^d	4	1	4	967	3,868	193.4	386.8	\$426,227.68
Annual Compliance Certification ^e	2	1	2	967	1,934	96.7	193.4	\$213,113.84
Annual Report of Deviations ^f	2	1	2	48	96	4.8	9.6	\$10,578.56
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Reporting Subtotal	13,455						\$1,289,262	
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							

E. Time to enter information	N/A							
Records of all information required by standards ^g	0.33	52	17.16	967	16,593.72	829.69	1,659.37	\$1,828,517.00
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^h	0.25	1	0.25	1,982	495.5	24.78	49.55	\$54,601.00
I. Time for audits	N/A							
Recordkeeping Subtotal						19,653	\$1,883,118.00	
GRAND TOTAL					33,108		\$3,172,379	
TOTAL NUMBER OF ANNUAL RESPONSES ⁱ	2,030							
CAPITAL COSTS								
File cabinets ^j								\$75,722.22
ANNUALIZED CAPITAL COSTS ^k								
File cabinets (15 year life, 7% interest -> CRF=0.1098)								\$8,314
TOTAL ANNUALIZED COSTS								\$8,314

N/A = not applicable.

^a This ICR uses the following labor rates: \$121.42 for managerial labor, \$99.14 for technical labor, and \$49.81 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2010, "Table 2. Civilian Workers, by occupational and industry group." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^b There are an estimated 2,900 existing plating and polishing plants and no new facilities are expected; the average number expected to read the rule during the 3-yr clearance period is $2,900/3 = 967$.

^c Each of the 2,900 existing plants noted above would be required to submit an initial notification.

^d Each of the 2,900 existing plants noted above would be required to submit a notification of compliance status.

^e The 2,900 existing plants would be required to prepare an annual compliance certification at the end of Year 3 of the ICR clearance period and submit the certifications if a deviation occurred; assuming that 5 percent of the plants experience a deviation, the number of compliance certifications submitted will be $(2,900 \times 0.05)/3 = 48$.

^f Assumes that 5% of existing facilities would have to submit a report of deviations starting in Year 3 of the ICR clearance period, or $(2,900 \times 0.05)/3 = 48$.

^g Recordkeeping requirements begin in Year 3 of ICR clearance period for all existing plants, or $2,900/3 = 967$; it is assumed that 0.33 hr (20 minutes) per week will be required per facility for recordkeeping.

^h Transmittals would include initial notifications for 2,900 plants, notifications of compliance status for 2,900 plants, annual compliance certifications for 5% of one-third of 2,900 plants, and annual reports of deviations for 5% of one-third of 2,900 facilities in Year 3, for an average of $(2,900 + 2,900 + 2,900/3 \times 0.05 + 2,900/3 \times 0.05)/3 = 2,030$ for each year of the 3-yr ICR clearance period.

ⁱ The total annual number of responses is calculated by summing up the product of columns B and D for each of the reports listed in 4B.

^j Assumes one standard four-drawer file cabinet for one-third of the 2,900 facilities, or an average of $2,900/3=322$ file cabinets per year required to maintain records at a cost of \$235 per cabinet.

^k Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=i \times (1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years).

Table 2: Average Annual EPA Burden and Cost - NESHAP for Plating and Polishing Operations (40 CFR Part 63, Subpart WWWW) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A) x (B)	(D) Respondents per year	(E) Technical person-hours (C) x (D)	(F) Managerial person-hours (E) x 0.05	(G) Clerical person-hours (E) x 0.10	(H) Cost, \$
Report Review:								
Initial Notification of applicability ^b	1	1	1	967	967.00	48.35	96.7	\$50,112.26
Notification of Compliance Status ^c	2	1	2	967	1,934,000	96.7	193.4	\$100,224.52
Annual Compliance Certification ^d	2	1	2	48	96.00	4.8	9.6	\$4,974.95
Annual Report of Deviations ^e	2	1	2	48	96.00	4.8	9.6	\$4,974.95
SUBTOTAL ANNUAL BURDEN					3,093	155	309	\$160,287
GRAND TOTAL (Rounded)					3,557			

^a This ICR uses the following average hourly labor rates: \$62.27 for managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 (GS-12, Step 1, \$28.88 x 1.6) for technical and \$25.01 (GS-6, Step 3, \$15.63 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) 2011 General Schedule, which excludes locality rates of pay.

^b Assumes 2,900 existing and no new plants will complete initial notifications for an average of (2,900)/3 = 967 per year during each year of the 3-yr ICR clearance period.

^c Each of the 2,900 existing plants noted above would be required to submit a notification of compliance status.

^d The 2,900 existing plants would be required to prepare an annual compliance certification at the end of Year 3 of the ICR clearance period; any plant that experiences a deviation will have to submit the compliance certification; assuming 5 percent of the plants experience a deviation, the number of submittals would be (2,900 × 0.05)/3 = 48.

^e Assumes that 5% of existing facilities would have to submit a report of deviations starting in Year 3 of the ICR clearance period, or (2,900 × 0.05)/3 = 48.