

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal), EPA ICR number 2298.03, OMB Control Number 2060-0622

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Area Source Categories (40 CFR Part 63, Subpart XXXXXX) were proposed on April 03, 2008 (73 FR 18334), and promulgated on July 23, 2008 (73 FR 42978). These regulations apply to owners or operators of any existing or new metal fabrication and finishing facility that is an area source of hazardous air pollutants (HAP) emissions and uses or has the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. The affected sources consist of several types of metal fabrication and finishing processes, including any abrasive blasting, metalworking (which includes machining, and dry grinding and dry polishing with machines), spray painting, and welding operations that use or have potential to emit any MFHAP.

In general, all NESHAP standards require initial notifications, annual compliance certifications (which include annual reports of exceedences if any have occurred.) 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.

There are an estimated 5,800 sources that will be subject to this standard, with no new additional sources expected during the next three years. Consequently, the average annual number of sources during the 3-year period of this ICR is 1,933.

All of the nine metal fabrication and finishing facilities in the United States are owned and operated by the metal fabrication and finishing industry (the “Affected Public”). None of these 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 Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (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 (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 metal fabrication or finishing processes 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 XXXXXX.

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. 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. Non-duplication, Consultations, and Other Collection Criteria

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

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 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 (77 FR 6557) on February 8, 2012. 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: 1) the Edison Welding Institute, at (614) 688-5063; 2) the Metal Powder Industries Federation, at (609) 452-7700; and 3) the National Electrical Manufacturers, at (703) 841-3237.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

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 (CBI) (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 metal fabrication and finishing facilities. 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.

Standard (40 CFR Part 63, Subpart XXXXXX)	SIC Codes	NAICS Codes
Electrical and Electronic Equipment Finishing Operations	3699, 3621	
Fabricated Metal Products	3499	
Fabricated Plate Work (Boiler Shops)	3443	
Fabricated Structural Metal Manufacturing	3441	
Heating Equipment (Except Electric)	3433	
Industrial Machinery and Equipment: Finishing Operations	3531, 3533, 3561	
Iron and Steel Forging	3462	
Primary Metal Products Manufacturing	3399	
Valves and Pipe Fittings	3494	
Iron and Steel Forging		332111
Powder Metallurgy Part Manufacturing		332117
Fabricated Structural Metal Manufacturing		332312
Plate Work Manufacturing		332313
Power Boiler and Heat Exchanger Manufacturing		332410
Metal Tank (Heavy Gauge) Manufacturing		332420
Other Fabricated Wire Product Manufacturing		332618
Other Metal Valve and Pipe Fitting Manufacturing		332919
All Other Miscellaneous Fabricated Metal Product Manufacturing		332999
Construction Machinery Manufacturing		333120
Oil and Gas Field Machinery and Equipment Manufacturing		333132
Heating Equipment (except Warm Air Furnaces) Manufacturing		333414
Pump and Pumping Equipment Manufacturing		333911
Motor and Generator Manufacturing		335312
All Other Miscellaneous Electrical Equipment and Component Manufacturing		335999

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Nine Metal Fabrication and Finishing Area Source (40 CFR Part 63, Subpart XXXXXX).

A source must make the following reports:

Notifications	
Notification of applicability	63.9(a)(2), 63.11519(a)(1)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.9(h), 63.11519(a)(2)
Notification of changes in information	63.9(j)

Reports	
Site-specific welding emissions management plan	63.11516(f)(7)(ii)
Startup, shutdown, or malfunction (SSM) plan	63.6(e)(3)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan	63.8(e)(3)

A source must keep the following records:

Recordkeeping	
Records of notifications	63.10, 63.11519(c)(1)(i)
Records that demonstrate continuous compliance	63.10, 63.11519(c)(1)&(4-15)
Monitoring/inspection information	63.10, 63.11519(c)(2-3)
Reports of exceedences	N/A
Semiannual monitoring reports	N/A
Initial/repeat performance tests	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)

Recordkeeping	
SSM reports	63.6(e)(3)
Excess emissions reports	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, Collected 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
Observe initial performance tests and repeat performance tests if necessary.
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 below in Table 1: Annual Respondent Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (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 20,562 hours at a cost of \$1,972,260 (Total Labor Hours from Table 1 below). 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 Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry cost associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

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 \$100,177.

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 Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (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 5,800 existing sources will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard. Consequently the average annual number of sources expected to read the rule during the 3-year period of this ICR is 1,933 (5,800/3=1,933.)

The overall average number of respondents, as shown in the table below, is 1,933 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(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	1,933	0	0	1,933
2	0	1,933	0	0	1,933
3	0	1,933	0	0	1,933
Average	0	1,933	0	0	1,933

¹ 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 1,933.

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	1,933	1	N/A	1,933
One-time notification of compliance status	0	1	N/A	0
Annual compliance certification	0	1	N/A	0
Report of exceedencess	0	1	N/A	0
			Total	1,933

The number of Total Annual Responses is 1,933.

The total annual labor costs are \$1,972,260. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (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 and summarized below in Tables 1 and 2, respectively.

(i) Respondent tally

The total annual labor hours are 20,562 hours at a cost of \$1,972,260. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 11 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are zero.

(ii) The Agency tally

The average annual Agency burden and cost over the next three years is estimated to be 2,223 labor hours at a cost of \$100,177. See below Table 2: Average Annual EPA Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal).

6(f) Reasons for Change in Burden

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

6 (g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 11 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-2012-0034, which is available for either online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation 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 Air 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-2012-0034 and OMB Control Number 2060-0622 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 Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (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 ^b	(E) Technical person-hours per year (E=CxD)	(F) Managerial person-hours per year (E x 0.05)	(G) Clerical person-hours per year (E x 0.10)	(H) Total Cost, \$ ^a
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 ^c	4	1	4	1,933	7,732	386.6	773.2	\$852,004.54
B. Required activities								
Initial notification ^d	2	1	2	1,933	3,866	193.3	386.6	\$426,002.28
Notification of compliance status ^e	4	1	4	0	0	0	0	\$0
Annual compliance certification ^f	2	1	2	0	0	0	0	\$0
Report of exceedences ^f	2	1	2	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Subtotal for Reporting Requirements	13,337.7							
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								
Records of all information required by standards ^g	0.25	12	3	1,933	5,799	289.95	579.9	\$639,003.41
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,i}	0.25	1	0.25	1,933	483.25	24.16	48.32	\$55,249.73
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirement	7,224.58							
Subtotals Labor Burdens and Costs					17,880.25	894.01	1,788.02	\$1,972,259.96
TOTAL LABOR BURDEN AND COST (ROUNDED)						20,562		\$1,972,260

Assumptions:

^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 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected; the average number expected to read the rule during the 3-yr clearance period is $5,800/3 = 1,933$.

^c We have assumed that 1,933 respondents will each take four hours to read instructions.

^d We have assumed that 1,933 respondents would be required to submit an initial notification.

^e We have assumed that each respondent will take four hours to complete the notification of compliance status task.

^f We have assumed that each respondent will take two hours once per year to complete the task.

^g We have assumed that each respondent will take 0.25 hours once per month to record information that are required by the standards.

^h We have assumed that each respondent will take 0.25 hours once per month to transmit or disclose information.

ⁱ We have assumed that transmittals would include initial notification for 5,800 plants for an average of $(5,800/3=1,933)$ for each year of the 3-year ICR clearance period.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal).

Activity	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours (E=CxD)	(F) Managerial person-hours (Ex0.05)	(G) Clerical person-hours (Ex0.1)	(H) Cost, \$ ^b
Report Review:								
Initial Notification ^c	1	1	1	1,933	1,933	96.65	193.3	\$100,176.76
Notification of compliance status ^d	2	1	2	0	0	0	0	\$0
Annual compliance certification ^d	2	1	2	0	0	0	0	\$0
Report of exceedance ^d	2	1	2	0	0	0	0	\$0
Subtotals Labor Burden and Cost					1,933	96.65	193.3	\$100,176.76
TOTAL ANNUAL BURDEN AND COST (rounded)						2,223		\$100,177

Assumptions:

^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 There are an estimated 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected; the average number expected to read the rule during the 3-yr clearance period is 5,800/3 = 1,933.

^c We have assumed that each respondent will take one hour once per year to review the initial notification report.

^d We have assumed that each respondent will take two hours once per year to review reports.