

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal), EPA ICR Number 1952.05, OMB Control Number 2060-0518.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) were proposed on April 24, 2002, and promulgated on May 23, 2003. These regulations apply to existing facilities and new facilities that perform metal furniture surface coating operations where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP; or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart RRRR.

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

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

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

Over the next three years, an average of 583 respondents per year will be subject to the standard, with no additional respondents per year becoming subject to the standard.

The Office of Management and Budget (OMB) approved the currently active ICR without any Terms of Clearance.

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (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, 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 furniture surface coating facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart RRRR.

### **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.

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

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 pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

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

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

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

#### **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, there is no duplication.

#### **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 47631) on August 9, 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 EPA's 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. In developing this ICR, we contacted both the American Home Furnishing Alliance, at (336) 884-5000, and the American Coatings Association, at (202) 719-3689.

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. In this case, no comments were received.

### **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 requirement is consistent 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 40000, September 8, 1978; 43 FR 42251, September 20, 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 facilities that perform metal furniture surface coating. The United States Standard Industrial Classification (SIC) codes, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for this source category.

<b>Standard (40 CFR Part 63, Subpart RRRR)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Metal household furniture manufacturing	2514	337124
Office furniture (except wood) manufacturing	2522	337214
Institutional furniture manufacturing	2531, 2599, 3999	337127
Showcase, partition, shelving, and locker manufacturing	2542, 3499, 3429	337215
Metal stamping	3469	332116
Spring (light gauge) manufacturing	3495	332612
Residential electric lighting fixture manufacturing	3645	335121
Commercial, industrial, and institutional electric lighting fixture manufacturing	3646	335122
Laboratory apparatus and furniture manufacturing	3821, 3841	339111
Reupholstery and furniture repair	7641	81142

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.4910(b), 63.9(b)
Notification of compliance status	63.4910(c), 63.9(h)
Notification of construction or reconstruction	63.5
Notification of actual startup	63.9(b)
Notification of performance test	63.7(b)

<b>Reports</b>	
Semiannual report	63.4920(a)
Excess emissions report	63.4920(a)(4-7)
Report of performance test	63.4920(b)
Startup, shutdown, malfunction report	63.4920(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Five year retention of records	63.4930(b), 63.10(b)
Material formulation data	63.4930(b)
Records of HAP content calculations	63.4930(c)
Copies of notifications and reports	63.4930(a)
Records of names of materials used	63.4930(d)
HAP fractions in each material used	63.4930(e)
Coating solids fraction in each material used	63.4930(f)
Density of materials used	63.4930(g)
Documentation of waste material shipped offsite	63.4930(h)
Start-up, shutdown, and malfunction plan/records	63.4930(k), 63.6(e)
Documentation of control device performance tests	63.4930(k), 63.10(b)
Values measured by continuous monitoring systems	63.4930(k)
Monitoring system calibrations, maintenance	63.4930(k)
Periods of monitoring system failure/shutdown	63.4930(j), 63.4930(k)
Work practice plan and implementation	63.4930(k)

### Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting

systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

### (ii) Respondent Activities

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-90, D2697-86, D6093-97 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
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.

<b>Agency Activities</b>
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.

<b>Agency Activities</b>
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. 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 the 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**

A 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. According to the Background Information for the NESHAP for Metal Furniture Surface Coating<sup>1</sup>, 42 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 42 percent of the 583 facilities affected by this ICR, or 245 facilities, are small entities.

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

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<sup>1</sup> National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Metal Furniture Surface Coating – Background Information for Proposed Standards, U.S. EPA, October 2001, EPA-453/R-01-010



The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (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. Where 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 190,408 (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	\$121.44 (\$57.83 + 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standard are 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(s) and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEM	\$16,000	0	\$0	\$1,200	583	\$699,600

There are no capital/startup costs for this ICR. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$699,600. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$699,600. These are the recordkeeping 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 \$1,251,472.

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), 2012 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 Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (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

583 existing respondents will be subject to the standard. It is estimated that no additional respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 583 per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	583	0	0	583
2	0	583	0	0	583
3	0	583	0	0	583
Average	0	583	0	0	583

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 583.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	583	2	0	1,166
Excess emissions report	583	0.5	0	291.5
Startup, shutdown, malfunction report	583	0.5	0	291.5
			<b>Total</b>	<b>1,749</b>

The number of Total Annual Responses is 1,749.

The total annual labor costs are \$21,773,132. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (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 190,408 at a cost of \$21,773,132. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 109 hours (rounded) per response.

The total annual capital/startup and O&M costs to the regulated entity are \$699,600. These cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

The average annual Agency burden and cost over next three years is estimated to be 21,454 labor hours at a cost of \$1,251,472. See below in Table 2: Average Annual EPA Burden

and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

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

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. However, there is an increase in cost per labor hours due to the updated labor rates. This ICR uses the most recently available labor rates in all burden calculations.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 109 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 suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0518. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID

Number EPA-HQ-OECA-2012-0518 and OMB Control Number 2060-0518 in any correspondence.

**Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal)**

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrence s per year	(C) Person-hrs. per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hrs. per year (E=CxD)	(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$) <sup>b</sup>
<b>1. Reporting requirements</b>								
a. Read rule and instructions	4	1	4	583	2,332	116.6	233.2	\$306,664
b. Process/review information	4	4	16	583	9,328	466.4	932.8	\$1,226,655
<b>c. Write reports</b>								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status	2	1	2	0	0	0	0	\$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
vi. Report of performance test	10	1.2	12	0	0	0	0	\$0
vii. Semiannual report <sup>c</sup>	6	2	12	583	6,996	349.8	699.6	\$919,991
viii. Excess emissions report <sup>d</sup>	4	0.5	2	583	1,166	58.3	116.6	\$153,332
ix. Startup, shutdown, malfunction (SSM) report <sup>d</sup>	4	0.5	2	583	1,166	58.3	116.6	\$153,332
<b>Subtotal Reporting</b>						<b>24,136.2</b>		<b>\$2,759,974</b>
<b>2. Recordkeeping requirements</b>								
a. Read rule and instructions	4	1	4	583	2,332	116.6	233.2	\$306,664
b. Plan activities	12	1	12	583	6,996	349.8	699.6	\$919,991
c. Implement activities	12	1	12	583	6,996	349.8	699.6	\$919,991
d. Maintain record system for material used	20	1	20	583	11,660	583	1,166	\$1,533,319
<b>e. Time to enter information</b>								
i. Material usage <sup>e</sup>	0.5	260	130	583	75,790	3,789.5	7,579	\$9,966,574
ii. Compliance calculation <sup>f</sup>	2	12	24	583	13,992	699.6	1,399.2	\$1,839,983
f. Time to train personnel	10	1	10	583	5,830	291.5	583	\$766,660
g. Store, file, and maintain records <sup>f</sup>	2	12	24	583	13,992	699.6	1,399.2	\$1,839,983
h. Retrieve records/reports <sup>f</sup>	1	12	12	583	6,996	349.8	699.6	\$919,991
<b>Subtotal Recordkeeping</b>						<b>166,271.6</b>		<b>\$19,013,157</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>190,407.8</b>		<b>\$21,773,132</b>

						<b>190,408 (rounded)</b>	
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**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 583 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.
- <sup>b</sup> This ICR uses the following labor rates: \$121.44 per hour for Executive, Administrative, and Managerial labor; \$100.23 per hour for Technical labor, and \$50.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012 "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We have assumed that each respondent will take six hours twice per year to complete the semiannual report.
- <sup>d</sup> We have assumed that each respondent will take four hours twice per year to complete the excess emissions reports and also four hours twice per year for the SSM reports.
- <sup>e</sup> We have assumed that each respondent will take 0.5 hours 260 times per year to enter information.
- <sup>f</sup> We have assumed that each respondent will have to complete task once per month.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal)**

Burden Item	(A) Person-hours per activity	(B) Number of activities per year	(C) Technical person-hours per year (C=AxB)	(D) Management person-hours per year (D=Cx0.05)	(E) Clerical person-hours per year (E=Cx0.1)	(F) Annual costs (\$/yr) <sup>a</sup>
1. Initial performance test	24	0	0	0	0	\$0
2. Repeat performance test	24	0	0	0	0	\$0
3. Report review						
a) Initial notification	8	0	0	0	0	\$0
b) Notification of performance test	8	0	0	0	0	\$0
c) Notification of compliance status	8	0	0	0	0	\$0
d) Notification of construction/reconstruction	8	0	0	0	0	\$0
e) Notification of actual startup	8	0	0	0	0	\$0
f) Notification of performance test	8	0	0	0	0	\$0
g) Report of performance test	8	0	0	0	0	\$0
h) Semiannual report <sup>b</sup>	12	1,166	13,992	699.6	1399.2	\$938,604
i) Excess emissions report	8	291.5	2,332	116.6	233.2	\$156,434
j) Startup, shutdown, malfunction report	8	291.5	2,332	116.6	233.2	\$156,434
<b>TOTAL LABOR BURDEN AND COSTS (rounded)</b>				<b>21,454</b>		<b>\$1,251,472</b>

**Assumptions:**

<sup>a</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.57 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) “2012 General Schedule” which excludes locality rates of pay.

<sup>b</sup> The semiannual report would have to be completed twice per year.