

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal), EPA ICR Number 1687.09, OMB Control Number 2060-0314

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities were: proposed on June 6, 1994; promulgated on September 1, 1995; and last-amended on April 20, 2006. These regulations apply to existing and new aerospace manufacturing and rework facilities where the total hazardous air pollutants (HAP) emitted are greater than or equal to 10 tons per year of any combination of HAP, or where the total HAP emitted are greater than or equal to 25 tons per year of any combination of HAP. New facilities include those that commenced construction or reconstruction after the date of proposal. Operations covered include: cleaning, primer and top coat application, depainting, chemical milling maskant application, and handling and storage of waste. This information is being collected to assure compliance with 40 CFR part 63, subpart GG.

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 two 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 136 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these standards. Each respondent may have one or more operations (e.g., cleaning, coating, or depainting operations) subject to these standards.

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

All of the aerospace manufacturing and rework facilities in the United States are owned and operated by the Aerospace Manufacturing and Rework industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, or local, or tribal entities or by the Federal government. They are all privately-owned, for-profit businesses. The “burden” to the Affected Public may be found below in Tables 1a through 1c: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (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 aerospace manufacturing and rework 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 GG.

## **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. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

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

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

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

### **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, duplication does not exist.

### **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 (78 FR 33409) on June 4, 2013. 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 these standards as it was being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Aerospace Manufacturing Technologies (AMT), at (360) 435-1119; and 2) Aerospace Industries Association, at (703) 358-1000.

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 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.

### **(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 aerospace manufacturing and rework facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes for the respondents are listed below.

<b>40 CFR Part 63, Subpart GG</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Aircraft and Parts	3720	None
Aircraft Manufacturing	3721	336411
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Other Aircraft Part and Auxiliary Equipment Manufacturing	3728	336413
Fluid Power Valve and Hose Fitting Manufacturing	3728	332912
Aircraft Manufacturing	3728	336411
Guided Missiles, Space Vehicles, and Parts	3760	334511
Guided Missiles and Space Vehicles Manufacturing	3761	336414
Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	3764	336415
Other Guided Missile and Space Vehicle Parts and Auxiliary Equipment Manufacturing	3769	336419
Airports, Flying Fields, and Airport Terminal Services	4581	488119

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

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

In this ICR, all the data that is recorded or reported is required by the NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG).

A source must make the following reports:

<b>Notifications/Reports</b>	
Notification of construction and modification	63.743(a)(2-3), 63.6(e), 63.753(a), 63.5(d), 63.10(d)(5)
Initial notification for existing sources	63.9(b)(2), 63.753(a)(2)
Notification of performance test and results	63.7(b), 63.7(g)(1), 63.9(e), 63.10(d)(2), 63.753(a)
Notification and report of physical and operational changes	63.5(b)(6), 63.743(a)(2), 63.753(a)
Notification and report of production capacity	63.9(b)(2), 63.753(a)
Notification and report of compliance status	63.9(h), 63.753(a)
Report of startup, shutdown, malfunction plan	63.10(a), 63.10(d)(5), 63.743(b), 63.753(a)
Notification and report for waiver applications	63.7(h)(3), 63.753(a)
Semiannual report	63.6(e), 63.10(d)(5), 63.10(e)(3), 63.753(b), 63.753(c)(1), 63.753(d)(1) and (3), 63.753(e)
Annual report	63.753(c)(2), 63.753(d)(2)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of daily and monthly inspections	63.6(e)(3), 63.10(b)(2), 63.743(a)(3), 63.752(a)
Emission testing	63.10(b)(2), 63.752(a)
Facility operation and maintenance including startup, shutdown, malfunction, construction and modification	63.5(b), 63.6(e), 63.743(a)(2) and (3), 63.743(b), 63.752
Cleaning solvents, all information records	63.752(b)(1)
Cleaning solvents, approved composition and vapor pressure, solvent usage records	63.752(b)(2)
Cleaning solvents, non-approved composition, approved vapor	63.752(b)(3)

<b>Recordkeeping</b>	
pressure, solvent usage records	
Cleaning solvents, usage log for exempt processes	63.752(b)(4)
Cleaning solvents, log of spray gun cleaner leaks	63.752(b)(5)
Primers/topcoats/maskants: Records using compliant coatings without averaging	63.752(c)(1-3), 63.752(f)(1)
Primers/topcoats/maskants: Records using averaging	63.752(c)(1), 63.752(c)(4), 63.752(f)(2)
Primers/topcoats/maskants: Records using control devices	63.752(c)(1), 63.752(c)(5-6), 63.752(d), 63.752(f)(3), 63.752(f)(4)
Chemical strippers, records and parts removed	63.752(e)(1), 63.752(e)(4)
Chemical strippers, records using control devices	63.752(e)(2), 63.752(e)(3)
Depainting equipment malfunction log	63.752(e)(5)
Annual exempt chemical stripper usage log and reworked airplane log for spot stripping and decal removal	63.752(e)(6)
Depainting control device maintenance log	63.752(e)(7)
5-years retention of records	63.10(b)(1), 63.752(a)

### 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 opacity, or for pressure drop and liquid supply pressure for control device.

<b>Respondent Activities</b>
Perform initial performance test, Reference Methods 1, 1A, 2, 2B, 2C, 2D, 3, 4, 18, 24, 25A, 40, 301, or 319 tests, 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>
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 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.

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

The specific frequency for each information collection activity within this request is shown below in Tables 1a through 1c: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

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

Tables 1a through 1c below 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 140,936 hours (Total Labor Hours from Tables 1a through 1c 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	\$123.04 (\$58.59 + 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "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 initial, 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	\$14,000	0	\$0	\$1,000	136	\$136,000
Total			\$0			\$136,000

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

The total operation and maintenance (O&M) costs for this ICR are \$136,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$136,000. These are 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 \$233,003.

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), 2013 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 Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (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

136 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 136 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>					
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	136	0	0	136
2	0	136	0	0	136
3	0	136	0	0	136
Average	0	136	0	0	136

<sup>1</sup> New respondent 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 136.

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 <sup>1</sup>	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of physical and operational changes	14	1	0	14
Notification of actual startup	0	1	0	0
Notification of change in production capacity	0	1	0	0
Compliance status information report	277	1	0	277
Waiver application	28	1	0	28
Startup, shutdown, malfunction plan	177	1	0	177
Startup, shutdown, malfunction report	55	1	0	55
Semiannual report – including report of periods of noncompliance	222	2	0	444
Total Number of Annual Responses			Total	995

<sup>1</sup> We estimate there are 136 existing respondents. Each respondent may have one or more operations (cleaning, coating, and/or depainting operations) that are subject to these standards.

The number of Total Annual Responses is 995.

The total annual labor costs are \$13,785,987. Specific, individual details regarding these estimates may be found below in Tables 1a through 1c: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (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 below in Tables 1a through 1c and 2, respectively, and summarized below.

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

The total annual labor hours are 140,936 at a cost of \$13,785,987. Specific details regarding these estimates may be found below in Tables 1a through 1c: Annual Respondent Burden and Cost –

NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal), and a combined summary of Tables 1a through 1c may be found below in Table 1d: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, & 1c - NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 142 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$136,000. The 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 5,170 labor hours at a cost of \$233,003. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

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

There is an adjustment decrease in respondent burden hours and an increase in Agency hours in this ICR compared to the previous ICR; however, this adjustment is not due to any program changes. The changes are a result of several corrections; specifically, this ICR: 1) corrects discrepancies in the number of compliance status reports and SSM reports between the respondent and the Agency burden tables; 2) corrects rounding errors in respondent burden Table 1b in the previous ICR; and 3) changes the frequency of reviewing semiannual reports from one to two for the Agency. This ICR also uses updated labor rates in calculating all costs, which results in an overall increase in burden costs.

Furthermore, this ICR corrects the number of responses to be consistent with the burden calculations. This results in an adjustment increase in the total number of responses.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 142 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-2013-0335. 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), WJC 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-2013-0335 and OMB Control Number 2060-0314 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 1a: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Cleaning Operations)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technica l person- hours per year (C x D)	(F) Managemen t person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions <sup>c</sup>	1	1	1	136	136	6.8	13.6	\$15,298.64
B. Required activities	N/A							
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>d</sup>	8	1	8	7	56	2.8	5.6	\$6,299.44
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>e</sup>	20	1	20	136	2,720	136	272	\$305,972.80
Waiver application <sup>f</sup>	4	1	4	14	56	2.8	5.6	\$6,299.44
Startup, shutdown, malfunction plan <sup>g</sup>	4	1	4	136	544	27.2	54.4	\$61,194.56
Preparation of site-specific test plan	N/A							
Notification of initial performance test	N/A							
Report of initial test	N/A							
Startup, shutdown, malfunction report <sup>h</sup>	2	1	2	27	54	2.7	5.4	\$6,074.46
Semiannual report – including report of	12	2	24	109	2,616	130.8	261.6	\$294,273.84



periods of noncompliance <sup>i</sup>								
<b>Subtotal for Reporting Requirements</b>						<b>7,109.3</b>		<b>\$695,413.18</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	4	1	4	136	544	27.2	54.4	\$61,194.56
C. Implement activities								
Solvent information records	4	2	8	136	1,088	54.4	108.8	\$122,389.12
Approved composition solvent records (demonstrating compliance) <sup>j</sup>	4	1	4	41	164	8.2	16.4	\$18,448.36
Non-approved list solvent usage records <sup>k</sup>	1	12	12	122	1,464	73.2	146.4	\$164,685.36
Solvent usage log for exempt processes <sup>l</sup>	0.5	12	6	95	570	28.5	57	\$64,119.30
Log of gun cleaner leaks <sup>m</sup>	1	6	6	27	162	8.1	16.2	\$18,223.38
D. Develop record system <sup>n</sup>	20	1	20	136	2,720	136	272	\$305,972.80
E. Time to enter information								
Records of startup, shutdown, and malfunction	2	1	2	27	54	2.7	5.4	\$6,074.46
Records of all measurements and information required by standard								
F. Time to train personnel <sup>o</sup>	4	50	200	136	27,200	1,360	2,720	\$3,059,728.00
G. Time for audits	20	1	20	136	2,720	136	272	\$305,972.80
<b>Subtotal for Recordkeeping Requirements</b>						<b>42,188.9</b>		<b>\$4,126,808.14</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>49,298</b>		<b>\$4,822,221</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 136. There will be no new additional sources during the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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 there will be no net growth for the industry over the three-year period of this ICR, only existing sources will read instructions.

<sup>d</sup> We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report (136 x 5% = 6.8, rounded to 7).

- <sup>e</sup> We have assumed that each respondent will write compliance status information report.
- <sup>f</sup> We have assumed that 10 percent of the respondents will request a waiver ( $136 \times 10\% = 14$ ).
- <sup>g</sup> This is based on the number of facilities with add-on control systems that require the development of inspection and maintenance and startup, shutdown, malfunction plan. We have assumed that all of the facilities will have enclosed gun cleaners.
- <sup>h</sup> We have assumed that 20 percent of facilities with add-on control system will have a malfunction ( $136 \times 20\% = 27$ ).
- <sup>i</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way ( $136 \times 80\% = 109$ ).
- <sup>j</sup> We have assumed that 30 percent of facilities will use the approved list of solvents ( $136 \times 30\% = 41$ ).
- <sup>k</sup> We have assumed that 90 percent of facilities will use some solvents not on the approved list ( $136 \times 90\% = 122$ ).
- <sup>l</sup> We have assumed that 70 percent of facilities will use some solvents for exempt processes.
- <sup>m</sup> We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner.
- <sup>n</sup> We have assumed that all facilities will need to develop a record keeping system.
- <sup>o</sup> We have assumed that each respondent will take 4 hours 50 times per year to complete task.

**Table 1b: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)(Coating Operations)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions <sup>c</sup>	1	1	1	136	136	6.8	13.6	\$15,298.64
B. Required activities								
Initial performance tests <sup>d</sup>	280	1	280	4	1,120	56	112	\$125,988.80
Repeat performance test <sup>e</sup>	280	1	280	1	280	14	28	\$31,497.20
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>f</sup>	8	1	8	7	56	2.8	5.6	\$6,299.44
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report	10	1	10	136	1,360	68	136	\$152,986.40
Waiver application <sup>g</sup>	4	1	4	14	56	2.8	5.6	\$6,299.44
Startup, shutdown, malfunction plan <sup>h</sup>	4	1	4	41	164	8.2	16.4	\$18,448.36
Preparation of site-specific test plan	See 3B							
Notification of initial performance test	2	1	2	4	8	0.4	0.8	\$899.92
Report of initial test	See 3B							
Startup, shutdown, malfunction report <sup>i</sup>	4	1	4	27	108	5.4	10.8	\$12,148.92

Semiannual report – including report of periods of noncompliance <sup>j</sup>	11	2	22	109	2,398	119.9	239.8	\$269,751.02
<b>Subtotal for Reporting Requirements</b>						<b>6,538.9</b>		<b>\$639,618.14</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	4	1	4	136	544	27.2	54.4	\$61,194.56
C. Implement activities								
Compliance coating records	1	12	12	136	1,632	81.6	163.2	\$183,583.68
Daily records of weighted average mass <sup>k</sup>	1	250	250	14	3,500	175	350	\$393,715.00
Control device maintenance or rolling material balance log (organics)	0.5	250	125	4	500	25	50	\$56,245.00
Control device maintenance log (inorganics)	0.25	250	62.5	136	8,500	425	850	\$956,165.00
D. Develop record system <sup>l</sup>	10	1	10	136	1,360	68	136	\$152,986.40
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	2	1	2	27	54	2.7	5.4	\$6,074.46
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel	8	50	400	136	54,400	2,720	5,440	\$6,119,456.00
G. Time for audits	20	1	20	136	2,720	136	272	\$305,972.80
<b>Subtotal for Recordkeeping Requirements</b>						<b>84,191.5</b>		<b>\$8,235,392.90</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>90,730</b>		<b>\$8,875,011</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 136. There will be no new additional sources during the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: : \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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 there will be no net growth for the industry over the three-year period of this ICR, only existing sources will read instructions.

- <sup>d</sup> We assume that 4 facilities will use add-on control equipment for maskant application.
- <sup>e</sup> We have assumed that 1 facility with add-on control equipment will repeat performance test.
- <sup>f</sup> We have assumed that 5 percent of existing facilities will write the physical and operational changes report ( $136 \times 5\% = 7$ ).
- <sup>g</sup> We have assumed that 10 percent of facilities will request a waiver ( $136 \times 10\% = 14$ ).
- <sup>h</sup> We have assumed that 30 percent of facilities will be required to submit operational plans due to deviations from manufacturers' specifications, and based on the number of facilities with add-on control systems that require the development of inspection, maintenance, startup, shutdown, and malfunction plans.
- <sup>i</sup> We have assumed that 20 percent of facilities with add-on control system (including particulate filters) will have a malfunction.
- <sup>j</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way.
- <sup>k</sup> The final rule required monthly records. Daily averaging was included in the cost analysis because 90 percent of the industry is located in non-attainment areas and will be required to use daily averaging by the permitting agency.
- <sup>l</sup> We have assumed that all facilities will need to develop a record keeping system.

**Table 1c: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Depainting Operations)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions <sup>c</sup>	1	1	1	5	5	0.25	0.5	\$562.45
B. Required activities	N/A							
Initial performance tests	280	1	280	0	0	0	0	\$0
Repeat performance test	280	1	280	0	0	0	0	\$0
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes	8	1	8	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report	10	1	10	5	50	2.5	5	\$5,624.50
Waiver application	4	1	4	0	0	0	0	\$0
Startup, shutdown, malfunction plan	5	1	5	0	0	0	0	\$0
Preparation of site-specific test plan	N/A							
Notification of initial performance test	2	1	2	0	0	0	0	\$0

Report of initial test	See 3B							
Startup, shutdown, malfunction report <sup>d</sup>	4	1	4	1	4	0.2	0.4	\$450
Semiannual report – including report of periods of Noncompliance <sup>e</sup>	12	2	24	4	96	4.8	9.6	\$10,799.04
<b>Subtotal for Reporting Requirements</b>						<b>178.25</b>		<b>\$17,435.95</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	4	1	4	5	20	1	2	\$2,249.80
C. Implement activities <sup>f</sup>								
Chemical stripper records (demonstrating compliance)	8	1	8	4	32	1.6	3.2	\$3,599.68
Chemical stripper usage log	1	12	12	4	48	2.4	4.8	\$5,399.52
Depainting equipment malfunction log	4	3	12	2	24	1.2	2.4	\$2,699.76
Exempt stripper usage log and reworked airplane log spot stripping and decal removal	1	12	12	5	60	3	6	\$6,749.40
Record of parts removed for parts depainting	8	2	16	5	80	4	8	\$8,999.20
Control device maintenance log	0.5	250	125	2	250	12.5	25	\$28,122.50
D. Develop record system <sup>g</sup>	10	1	10	5	50	2.5	5	\$5,624.50
E. Time to enter information								
Records of startup, shutdown, and malfunction	2	1	2	0	0	0	0	\$0
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel	4	1	4	5	20	1	2	\$2,249.80
G. Time for audits	10	1	10	5	50	2.5	5	\$5,624.50
<b>Subtotal for Recordkeeping Requirements</b>						<b>729</b>		<b>\$71,318.66</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>907</b>		<b>\$88,755</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 136. There will be no new additional sources during the next three

years of this ICR. Of the 136 facilities, we assume 5 facilities have repainting operations.

<sup>b</sup> This ICR uses the following labor rates: : \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, 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 there will be no net growth for the industry over the three-year period of this ICR, only existing sources will read instructions..

<sup>d</sup> We have assumed that 20 percent of facilities will have a malfunction ( $20\% \times 5 = 1$ ).

<sup>e</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports ( $5 \times 80\% = 4$ ).

<sup>f</sup> We have assumed that 1 percent of facilities will use HAP containing chemical strippers as the primary stripping techniques, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.

<sup>g</sup> We have assumed that all respondents will need to develop a record keeping system.

**Table 1d: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, & 1c - NESHAP for Aerospace Manufacturing**



**and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

<b>Burden</b>	<b>Burden Hours per Year for Reporting</b>	<b>Burden Hours per Year for Recordkeeping</b>	<b>Total Burden Hours per Year</b>	<b>Annual Costs in \$ (rounded)</b>
1a. Cleaning Operations	7,109.3	42,188.9	49,298.2	\$4,822,221
1b. Coating Operations	6,538.9	84,191.5	90,730.4	\$8,875,011
1c. Depainting Operations	178.25	729.1	907.35	\$88,755
<b>Total Burden and Cost (rounded)</b>	<b>13,826</b>	<b>127,110</b>	<b>140,936</b>	<b>\$13,785,987</b>

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Managemen t person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per Year <sup>b</sup>
1. Initial performance test	80	1	80	0	0	0	0	\$0
2. Repeat performance test								
Retesting preparation <sup>c</sup>	16	1	16	1	16	0.8	1.6	\$829.19
Retesting <sup>d</sup>	80	1	80	0	0	0	0	\$0
3. Report review								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical or operational changes <sup>e</sup>	2	1	2	14	28	1.4	2.8	\$1,451.09
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of changes in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>f</sup>	6	1	6	277	1,662	83.1	166.2	\$86,132.32
Waiver application <sup>g</sup>	6	1	6	28	168	8.4	16.8	\$8,706.52
Review of startup, shutdown, malfunction plan <sup>h</sup>	6	1	6	177	1,062	53.1	106.2	\$55,037.62
Review of site specific test plan	N/A							
Notification of initial performance test <sup>i</sup>	2	1	2	4	8	0.4	0.8	\$414.60
4. Report review								
Report of initial test	8	1	8	0	0	0	0	\$0
Review of startup, shutdown, malfunction reports	4	1	4	55	220	11	22	\$11,401.39
Review of semiannual reports <sup>j</sup>	3	2	6	222	1,332	66.6	133.2	\$69,030.23
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>5,170</b>		<b>\$233,003</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 136. There will be no new additional sources during the next three years of this ICR.
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2013 General Schedule which excludes locality rates of pay.
- <sup>c</sup> We have assumed that it will take 16 hours to prepare for retesting.
- <sup>d</sup> We have assumed that 20 percent of respondents will fail the initial performance test and will have to be retested.
- <sup>e</sup> We have assumed that it will take two hours once per year to review the compliance status information report..
- <sup>f</sup> We have assumed that it will take six hours to review the compliance status information report.
- <sup>g</sup> We have assumed that the Agency will take 6 hours to review the waiver application for each of 28 respondents.
- <sup>h</sup> We have assumed that it will take six hours to review the startup, shutdown, malfunction plan.
- <sup>i</sup> We have assumed that it will take 2 hours to review the initial performance test.
- <sup>j</sup> We have assumed that it will take 3 hours to review each semiannual report.