

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Risk and Technology Review (RTR) for NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG)

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) RTR, EPA ICR Number 1687.10 OMB Control Number 2060-0314.

1(b) Short Characterization/Abstract

This supporting statement addresses information collection activities that will be imposed by amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, 40 CFR part 63, subpart GG. Proposed on June 6, 1994; promulgated on September 1, 1995; and last-amended on April 20, 2006, the NESHAP applies 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 single 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 topcoat application, repainting, chemical milling maskant application, and handling and storage of waste.

As part of the residual risk review for the NESHAP and technology reviews for the NESHAP, the proposed amendments add specialty coating application operations to the rule and remove the exemptions from the emissions limitations for periods of startup, shutdown and malfunction (SSM) so that affected units would be subject to the emission standards at all times. This information collection request documents the additional recordkeeping and reporting requirements and burden imposed by the proposed amendments to the rule.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the proposed amendments to the NESHAP for Aerospace Manufacturing and Rework Facilities. The proposed rule would add recordkeeping and reporting provisions for specialty coating operations, but would not change the compliance costs for operations already being regulated by the existing emission standards.

Any owner/operator subject to the provisions of this part shall maintain a file of these notifications, reports, and records, and retain the file for at least five years following the date of

such notifications, 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.

Based on our consultations with industry representatives, there is an average of one affected specialty coating operation (which is the total of all specialty coating applications) 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 144 facilities per year will be subject to the standard, and no additional respondents per year will become subject to the standard. However, 36 of these facilities are owned and operated by the Federal government, and are not considered respondents of this ICR. Therefore, the Affected Public only includes the 108 facilities that are privately-owned, for-profit businesses. Each respondent may have one or more operations (e.g., cleaning, coating, repainting, or specialty coating operations) subject to these standards. Of the 144 existing sources currently covered by this standard, 109 facilities have specialty coating operations. The EPA estimates that the total number of potentially affected facilities with specialty coating operations is approximately 27 Federal government-operated facilities and 82 privately-operated facilities.

All of the aerospace manufacturing and rework facilities in the United States are owned and operated by the Aerospace Manufacturing and Rework industry. Thirty-six of the facilities in the United States are owned by the Federal government and 108 facilities are privately-owned, for-profit businesses (hereafter, the latter are referred to as the “Affected Public”). The “burden” to the Affected Public may be found below in Tables A1 to A3 of Attachment A. The cost of this ICR to privately-operated aerospace manufacturing and rework facilities is \$435,176 in labor costs, averaged over the first 3 years after the amendments are final.

The total average annual Agency cost during the three years of the ICR is estimated to be \$207,135. The “burden” to the Agency may be found below in Tables B1 through C3 of attachment A. The burden includes the cost to Federal government-operated aerospace manufacturing and rework facilities to comply with the proposed amendments, and to the Federal EPA and state agencies to implement the proposed amendments.

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard(s). Continuous emission monitors are used to ensure compliance with the standard(s) 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(s) 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(s) 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. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

A public notice of this collection is provided in the Federal Register notice of proposed rulemaking published for the Aerospace Manufacturing and Rework Facilities NESHAP RTR.

3(c) Consultations

The public will be provided the opportunity to review and comment on the burden estimated in this Information Collection Request during the comment period for the proposed rulemaking. In addition, industry representatives including Aerospace Industries Association, and several member companies, provided information concerning the NESHAP for Aerospace Manufacturing and Rework Facilities at meetings with the EPA prior to rule proposal.

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 40 CFR Part 70 permit program and the five year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 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 for aerospace manufacturing and rework facilities are listed below.

40 CFR Part 63, Subpart GG	SIC Codes	NAICS Codes
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
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
Scheduled Passenger Air Transportation	4512	481111
Scheduled Freight Air Transportation	4512	481112
Nonscheduled Chartered Passenger Air Transportation	4522	481211
Nonscheduled Chartered Freight Air Transportation	4522	481212
Other Nonscheduled Air Transportation	4522	481219

4(b) Information Requested

(i) Data Items

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

A source must make the following reports:

Notifications/Reports	
Notification of construction and modification	63.743(a)(2-3), 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)
Notification and report for waiver applications	63.7(h)(3), 63.753(a)
Semiannual report	63.10(e)(3), 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:

Recordkeeping	
Records of daily and monthly inspections	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 construction and modification	63.5(b), 63.743(a)(2) and (3), 63.752
Primers/topcoats/maskants/specialty coatings: Records using compliant coatings without averaging	63.752(c)(1-3), 63.752(f)(1)
Primers/topcoats/maskants/specialty coatings: Records using averaging	63.752(c)(1), 63.752(c)(4), 63.752(f)(2)
Primers/topcoats/maskants/specialty coatings: Records using control devices	63.752(c)(1), 63.752(c)(5-6), 63.752(d), 63.752(f)(3), 63.752(f)(4)
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

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Methods 1, 1A, 2, 2A, 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.

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

5(b) Collection Methodology and Management

Facilities are expected to use purchase records and manufacturer's documentation of HAP and VOC content, based on coating formulation, to establish compliance with the proposed HAP and VOC content limit standards in the Aerospace NESHAP for specialty coatings. Facilities are not expected to measure the HAP or VOC content of the coatings. If a facility is using add-on controls to comply, 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 used in compliance and enforcement programs. The semiannual reports submitted by respondents 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

There are no small entities (i.e., small businesses) using specialty coatings and affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Tables A1 to B3 of Attachment A.

6. Estimating the Burden and Cost of the Collection

Tables A1 to A3 in Attachment A present an itemized breakdown of the reporting and recordkeeping requirements in the first 3 years for the private sector respondents subject to the proposed NESHAP. Tables B1to B3 presents the burden on Federal government-operated aerospace manufacturing and rework facilities and is included in the Agency burden discussed below.

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 respondents in the private sector over the next three years from these recordkeeping and reporting requirements is estimated to be 4,475 hours (Total Labor Hours from Tables A1 to A3 of Attachment A). 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	\$127.72 (\$60.82 + 110%)
Technical	\$101.60 (\$48.38 + 110%)
Clerical	\$38.58 (\$18.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Aerospace Product and Parts Manufacturing (NAICS code 336400). 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(s) are labor costs. There are no capital/startup or operation and maintenance costs associated with the recordkeeping and reporting requirements. EPA assumed that the recordkeeping associated with the specialty coating operations will be accomplished with the existing equipment (e.g., computer systems) used for compliance for existing coating operations.

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

There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

Costs to the Agency include the costs for Federal government-owned aerospace

manufacturing and rework facilities associated with complying with the proposed amendments. Tables B1 to B3 in Attachment A present an itemized breakdown of the reporting and recordkeeping requirements in the first 3 years for the Federal government-owned sources subject to the proposed NESHAP. The average annual burden to these respondents over the next three years from these recordkeeping and reporting requirements is estimated to be 2,439 hours and \$198,395 (Total Labor Burden and Cost from Tables B1 to B3).

The costs to the Agency also include 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 for these activities during the three years of the ICR is estimated to be \$8,740. Details upon which this estimate is based appear below in Tables C1 to C3 of Attachment A.

The total average annual Agency cost during the three years of the ICR is estimated to be \$207,135.

This ICR uses the following labor rates for the costs for Federal government-owned sources to comply with the proposed amendments:

Managerial	\$89.49 (\$55.93 + 60%)
Technical	\$86.16 (\$53.85 + 60%)
Clerical	\$29.04 (\$18.15 + 60%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Federal Executive Branch (NAICS code 999100).

The average hourly labor rate used for the EPA Region and States to review reports and compliance and enforcement is as follows:

Managerial	\$62.90 (GS-13, Step 5, \$39.61 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$28.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay.

Both sets of the above rates have been increased by 60 percent to account for the benefit packages available to government employees.

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

144 existing facilities will be subject to the standard. Thirty-six of the facilities in the United States are operated by the Federal government and 108 facilities are privately-owned, for-profit businesses. Thus, only the 108 privately-owned businesses are considered respondents to this ICR. Of the 144 existing sources currently covered by this standard, 109 facilities have specialty coating operations. The EPA estimates that the total number of potentially affected facilities with specialty coating operations is approximately 27 Federal government-operated facilities and 82 privately-operated facilities. This number of sources is expected to remain constant over the period of this ICR as no sources are expected to start-up over the next three years. This is based on a comprehensive ICR that was sent to all known aerospace facilities in February 2011.

While there are no additional reports that are required to be submitted by the respondents due to the proposed Amendments, additional time is needed to complete the annual reports and are therefore considered as one additional annual response for the 82 privately-operated facilities. Details regarding these estimates may be found in Attachment Tables A1 to B3.

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 A1 to A3, B1 to B3, and C1 to C3 respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours for privately-owned facilities are 4,475 hours at a cost of \$435,176. Details regarding these estimates may be found in Tables A1 to A3 of Attachment A. Attachment A also presents the burden on Federal government-operated facilities and is discussed below in section (ii).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 54.6 hours per response.

There are no total annual capital/startup and O&M costs to the regulated entity. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The total average annual Agency cost during the three years of the ICR is estimated to be \$207,135. This includes the average annual Agency burden and cost over next three years for Federal government-operated facilities (2,439 labor hours at a cost of \$198,395) and EPA Regions and States (148 labor hours at a cost of \$8,740). See Tables B1 to B3 and C1 to C3 for details.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR as it is for the proposed Aerospace Manufacturing and Rework Facilities NESHAP and is considered new burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 54.6 hours per response. This burden is estimated by dividing the average annual burden hours for privately-owned facilities over the three-year period (4,475) hours by the total number of responses during the three-year period (82). 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-2014-0830. 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) 566-1927. 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-2014-0830 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.

ATTACHMENT A

TABLES A, B, and C

Tables A1 - A3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Privately-Operated Aerospace Manufacturing and Rework Facilities – Years 1-3

Tables B1 - B3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Federal Government-Operated Aerospace Manufacturing and Rework Facilities – Years 1-3

Tables C1 - C3: Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Aerospace Specialty Coating Operations – Years 1-3

**Table A1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations
at Privately-Operated Aerospace Manufacturing and Rework Facilities - Year 1**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (A x B)	Respondents per year ^a	Technical person-hours per year (C x D)	Management person hours per year (E x 0.05)	Clerical person hours per year (E x 0.1)	Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c,d}	1	1	1	82	82	4.1	8.2	\$ 9,171.03
B. Required activities								
Initial performance tests	N/A							
Repeat performance test	N/A							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						94.3		\$ 9,171
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	4	1	4	82	328	16.4	32.8	\$ 36,684.11
C. Implement activities								
Compliance coating records	See NOTE 1			82	2497	124.85	249.7	\$ 279,268.97
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d,f}	10	1	10	82	820	41	82	\$ 91,710.28
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d,g}	2	3	6	82	492	24.6	49.2	\$ 55,026.17
G. Time for audits ^h	10	1	10	82	820	41	82	\$ 91,710.28
Subtotal for Recordkeeping Requirements						5700.55		\$ 554,400
TOTAL LABOR BURDEN AND COST (rounded)						5794.85		\$ 563,571

^a Assumes 82 privately-owned facilities will be subject to specialty coating provisions of the rule, and these account for 60% of specialty coatings.

^b Assumes the following labor rates: \$127.72 per hour for Executive, Administrative, and Managerial labor; \$101.60 per hour for Technical labor, and \$38.58 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Aerospace Product and Parts Manufacturing (NAICS code 336400): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^d One-time cost that is only incurred during the first year of compliance.

^e We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating

^f We have assumed that all facilities will need to develop a record keeping system.

^g We have assumed one person per shift will require training on recordkeeping requirements and system.

^h We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table A2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Privately-Operated Aerospace Manufacturing and Rework Facilities - Year 2

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 ^a	(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 ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c, d}	N/A							\$ -
B. Required activities								
Initial performance tests	N/A ^e							
Repeat performance test	N/A ^e							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						0		\$ -
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	N/A							\$ -
C. Implement activities								
Compliance coating records		See NOTE 1		82	2497	124.85	249.7	\$ 279,268.97
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d, f}	N/A							\$ -
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d, g}	N/A							\$ -
G. Time for audits ^h	10	1	10	82	820	41	82	\$ 91,710.28
Subtotal for Recordkeeping Requirements						3814.55		\$ 370,979
TOTAL LABOR BURDEN AND COST (rounded)						3814.55		\$ 370,979

^a Assumes 82 privately-owned facilities will be subject to specialty coating provisions of the rule, and these account for 60% of specialty coatings.

^b Assumes the following labor rates: \$127.72 per hour for Executive, Administrative, and Managerial labor; \$101.60 per hour for Technical labor, and \$38.58 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Aerospace Product and Parts Manufacturing (NAICS code 336400): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^u We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

^e We have assumed that all facilities will need to develop a record keeping system.

^f We have assumed one person per shift will require training on recordkeeping requirements and system.

^g We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

^h One-time cost that is only incurred during the first year of compliance.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table A3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Privately-Operated Aerospace Manufacturing and Rework Facilities - Year 3

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 ^a	(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 ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c,d}	N/A							\$ -
B. Required activities								
Initial performance tests	N/A ^e							
Repeat performance test	N/A ^e							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						0		\$ -
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	N/A							\$ -
C. Implement activities								
Compliance coating records		See NOTE 1		82	2497	124.85	249.7	\$ 279,268.97
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d,f}	N/A							\$ -
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d,g}	N/A							\$ -
G. Time for audits ^h	10	1	10	82	820	41	82	\$ 91,710.28
Subtotal for Recordkeeping Requirements						3814.55		\$ 370,979
TOTAL LABOR BURDEN AND COST (rounded)						3814.55		\$ 370,979

^a Assumes 82 privately-owned facilities will be subject to specialty coating provisions of the rule, and these account for 60% of specialty coatings.

^b Assumes the following labor rates: \$127.72 per hour for Executive, Administrative, and Managerial labor; \$101.60 per hour for Technical labor, and \$38.58 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Aerospace Product and Parts Manufacturing (NAICS code 336400): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^d We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

^e We have assumed that all facilities will need to develop a record keeping system.

^f We have assumed one person per shift will require training on recordkeeping requirements and system.

^g We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

^h One-time cost that is only incurred during the first year of compliance.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table B1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Federal Government-Operated Aerospace Manufacturing and Rework Facilities - Year 1

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (A x B)	Respondents per year ^a	Technical person-hours per year (C x D)	Management person hours per year (E x 0.05)	Clerical person hours per year (E x 0.1)	Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c,d}	1	1	1	27	27	1.35	2.7	\$ 2,525.54
B. Required activities								
Initial performance tests	N/A							
Repeat performance test	N/A							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						31.05		\$ 2,526
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	4	1	4	27	108	5.4	10.8	\$ 10,102.15
C. Implement activities								
Compliance coating records		See NOTE 1		27	1662	83.1	166.2	\$ 155,460.82
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d,f}	10	1	10	27	270	13.5	27	\$ 25,255.37
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d,g}	2	3	6	27	162	8.1	16.2	\$ 15,153.22
G. Time for audits ^h	10	1	10	27	270	13.5	27	\$ 25,255.37
Subtotal for Recordkeeping Requirements						2842.8		\$ 231,227
TOTAL LABOR BURDEN AND COST (rounded)						2873.85		\$ 233,752

^a Assumes 27 federally-owned facilities will be subject to specialty coating provisions of the rule, and these account for 40% of specialty coatings.

^b Assumes the following labor rates: \$89.49 per hour for Executive, Administrative, and Managerial labor; \$86.16 per hour for Technical labor, and \$29.04 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Federal Executive Branch (NAICS code 999100): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^d We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

^e We have assumed that all facilities will need to develop a record keeping system.

^f We have assumed one person per shift will require training on recordkeeping requirements and system.

^g We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

^h One-time cost that is only incurred during the first year of compliance.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table B2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Federal Government-Operated Aerospace Manufacturing and Rework Facilities - Year 2

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 ^a	(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 ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c,d}	N/A							\$ -
B. Required activities								
Initial performance tests	N/A ^e							
Repeat performance test	N/A ^e							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						0		\$ -
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	N/A							\$ -
C. Implement activities								
Compliance coating records		See NOTE 1		27	1662	83.1	166.2	\$ 155,460.82
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d,f}	N/A							\$ -
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d,g}	N/A							\$ -
G. Time for audits ^h	10	1	10	27	270	13.5	27	\$ 25,255.37
Subtotal for Recordkeeping Requirements						2221.8		\$ 180,716
TOTAL LABOR BURDEN AND COST (rounded)						2221.8		\$ 180,716

^a Assumes 27 federally-owned facilities will be subject to specialty coating provisions of the rule, and these account for 40% of specialty coatings.

^b Assumes the following labor rates: \$89.49 per hour for Executive, Administrative, and Managerial labor; \$86.16 per hour for Technical labor, and \$29.04 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Federal Executive Branch (NAICS code 999100): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^d We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

^e We have assumed that all facilities will need to develop a record keeping system.

^f We have assumed one person per shift will require training on recordkeeping requirements and system.

^g We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

^h One-time cost that is only incurred during the first year of compliance.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table B3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for Specialty Coating Operations at Federal Government-Operated Aerospace Manufacturing and Rework Facilities - Year 3

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (A x B)	Respondents per year ^a	Technical person-hours per year (C x D)	Management person hours per year (E x 0.05)	Clerical person hours per year (E x 0.1)	Total Cost Per Year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c,d}	N/A							\$ -
B. Required activities								
Initial performance tests	N/A ^e							
Repeat performance test	N/A ^e							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report								
Notification of construction/reconstruction	N/A ^e							
Notification of physical and operational changes	N/A ^e							
Notification of actual startup	N/A ^e							
Notification of change in production capacity	N/A ^e							
Compliance status information report	N/A ^e							
Waiver application	N/A ^e							
Startup, shutdown, malfunction plan	N/A ^e							
Preparation of site-specific test plan	N/A ^e							
Notification of initial performance test	N/A ^e							
Report of initial test	N/A ^e							
Startup, shutdown, malfunction report	N/A ^e							
Semiannual report – including report of periods of noncompliance	N/A ^e							
Subtotal for Reporting Requirements						0		\$ -
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^d	N/A							\$ -
C. Implement activities								
Compliance coating records		See NOTE 1		27	1662	83.1	166.2	\$ 155,460.82
Control device maintenance or rolling material balance log (organics)	N/A ^e							
Control device maintenance log (inorganics)	N/A ^e							
D. Develop record system ^{d,f}	N/A							\$ -
E. Time to enter/maintain information								
Records of startup, shutdown, and malfunction	N/A ^e							
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel ^{d,g}	N/A							\$ -
G. Time for audits ^h	10	1	10	27	270	13.5	27	\$ 25,255.37
Subtotal for Recordkeeping Requirements						2221.8		\$ 180,716
TOTAL LABOR BURDEN AND COST (rounded)						2221.8		\$ 180,716

^a Assumes 27 federally-owned facilities will be subject to specialty coating provisions of the rule, and these account for 40% of specialty coatings.

^b Assumes the following labor rates: \$89.49 per hour for Executive, Administrative, and Managerial labor; \$86.16 per hour for Technical labor, and \$29.04 per hour for Clerical labor. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States" in the Federal Executive Branch (NAICS code 999100): Managers, All Other for Managerial labor; Aerospace Engineers for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We have assumed that there will be no net growth for the industry, only existing sources will read instructions.

^d We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

^e We have assumed that all facilities will need to develop a record keeping system.

^f We have assumed one person per shift will require training on recordkeeping requirements and system.

^g We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

^h One-time cost that is only incurred during the first year of compliance.

NOTE 1 - These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. A separate worksheet breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses.

Table C1. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Aerospace Specialty Coating Operations - Year 1

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence (Tech Hours)	(C) Tech Hours Per Year @ \$46.67 (C=AxB)	(D) Management Hours Per Year @ \$62.90 (D=Cx0.05)	(E) Clerical Hours Per Year @ \$25.25 (E=Cx0.1)	(F) EPA Cost Per Year (a, b)
1. Applications	N/A					0
2. Read and Understand Rule Requirements ^{c, d}	60	1	60	3	6	\$4,065
3. Required Activities						
A. Observe initial performance tests	N/A					
B. Observe annual performance tests	N/A					
C. Excess emissions -- Enforcement Activities	N/A					
D. Create Information	N/A					
E. Gather Information	N/A					
F. Report Reviews						
1) Initial Notification ^d	0	0.5	0	0	0	\$0
2) Notification of Compliance Status ^d	0	0.5	0	0	0	\$0
3) Review annual and semiannual compliance report	109	1	109	5	11	\$7,385
4. Travel expenses:	N/A					
TOTAL:			169	8	17	\$11,450
			Total Hours	Labor	Non-Labor	Total
			194	\$11,450	\$0	\$11,450

^a We have assumed that the average number of respondents that will be subject to this rule will be 109. There will be no new additional sources during the next three years of this ICR.

^b Assumes the following labor rates: \$62.90 per hour for Management labor; \$46.67 per hour for Technical labor, and \$25.25 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

^c Assume that each State and EPA region reviews the rule and develops a plan for reviewing notifications and reports. 1 occurrence per State * 50 States + 1 occurrence per EPA Region * 10 Regions = 60 occurrences.

^d One-time only costs.

Table C2. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Aerospace Specialty Coating Operations - Year 2

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence (Tech Hours)	(C) Tech Hours Per Year @ \$46.67 (C=AxB)	(D) Management Hours Per Year @ \$62.90 (D=Cx0.05)	(E) Clerical Hours Per Year @ \$25.25 (E=Cx0.1)	(F) EPA Cost Per Year (a, b)
1. Applications	N/A					0
2. Read and Understand Rule Requirements ^{c,d}	0	1	0	0	0	\$0
3. Required Activities						
A. Observe initial performance tests	N/A					
B. Observe annual performance tests	N/A					
C. Excess emissions -- Enforcement Activities	N/A					
D. Create Information	N/A					
E. Gather Information	N/A					
F. Report Reviews						
1) Initial Notification ^d	0	0.5	0	0	0	\$0
2) Notification of Compliance Status ^d	0	0.5	0	0	0	\$0
3) Review annual and semiannual compliance report	109	1	109	5	11	\$7,385
4. Travel expenses:	N/A					
TOTAL:			109	5	11	\$7,385
			Total Hours	Labor	Non-Labor	Total
			125	\$7,385	\$0	\$7,385

^a We have assumed that the average number of respondents that will be subject to this rule will be 109. There will be no new additional sources during the next three years of this ICR.

^b Assumes the following labor rates: \$62.90 per hour for Management labor; \$46.67 per hour for Technical labor, and \$25.25 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

^c Assume that each State and EPA region reviews the rule and develops a plan for reviewing notifications and reports. 1 occurrence per State * 50 States + 1 occurrence per EPA Region * 10 Regions = 60 occurrences.

^d One-time only costs.

Table C3. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Aerospace Specialty Coating Operations - Year 3

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence (Tech Hours)	(C) Tech Hours Per Year @\$46.67 (C=AxB)	(D) Management Hours Per Year @\$62.90 (D=Cx0.05)	(E) Clerical Hours Per Year @\$25.25 (E=Cx0.1)	(F) EPA Cost Per Year (a, b)
1. Applications	N/A					0
2. Read and Understand Rule Requirements ^{c,d}	0	1	0	0	0	\$0
3. Required Activities						
A. Observe initial performance tests	N/A					
B. Observe annual performance tests	N/A					
C. Excess emissions -- Enforcement Activities	N/A					
D. Create Information	N/A					
E. Gather Information	N/A					
F. Report Reviews						
1) Initial Notification ^d	0	0.5	0	0	0	\$0
2) Notification of Compliance Status ^d	0	0.5	0	0	0	\$0
3) Review annual and semiannual compliance report	109	1	109	5	11	\$7,385
4. Travel expenses:	N/A					
TOTAL:			109	5	11	\$7,385
			Total Hours 125	Labor \$7,385	Non-Labor \$0	Total \$7,385

^a We have assumed that the average number of respondents that will be subject to this rule will be 109. There will be no new additional sources during the next three years of this ICR.

^b Assumes the following labor rates: \$62.90 per hour for Management labor; \$46.67 per hour for Technical labor, and \$25.25 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

^c Assume that each State and EPA region reviews the rule and develops a plan for reviewing notifications and reports. 1 occurrence per State * 50 States + 1 occurrence per EPA Region * 10 Regions = 60 occurrences.

^d One-time only costs.