

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plating and Polishing Area Sources (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Plating and Polishing Area Sources (Renewal), EPA ICR Number 2294.04, OMB Control Number 2060-0623.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plating and Polishing Area Sources were: proposed on March 14, 2008; promulgated on July 1, 2008; and amended on both June 20, 2011 and September 19, 2011. These regulations apply to existing and new plating and polishing facilities that are an area source of hazardous air pollutant (HAP) emissions and that use one or more of the following metal HAP: cadmium, chromium, lead manganese, or nickel (hereafter referred to as the plating and polishing metal HAP). A plating and polishing facility is a plant site that is engaged in any of the following processes: non-chromium electroplating; electroless or non-electrolytic plating; other non-electrolytic metal coating processes such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating, and thermal spraying; dry mechanical polishing of finished metals and formed products after plating or thermal spraying; electroforming; and electro-polishing. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart WWWWWW.

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.

Over the next three years, an average of 2,900 respondents per year will 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. No additional respondents per year will become subject to these same standard. Of these facilities, we estimate only 5 percent or 145 facilities will be required to submit a report. 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 1 affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site). The required annual reports are used to determine periods of

excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from plating and polishing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR Part 63, Subpart WWWW.

### **2(b) Practical Utility/Users of the Data**

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

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the leaks are being detected and repaired and the standard is being met.

The required annual 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 WWWWWW.

#### **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* (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the *Federal Register*.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is Enforcement and Compliance History Online (ECHO) which is operated and maintained by EPA's Office of Compliance. ECHO 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 association and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted both the National Association for Surface Finishing, at (202) 457-8404, and the Wisconsin Department of Natural Resources, at (608) 266-2856.

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.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

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

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

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

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

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

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

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

A source must make the following reports:

<b>Notifications</b>	
Initial Notification	40 CFR 63.11509(a)
Notification of compliance status	40 CFR 63.9(h), 40 CFR 63.11509(b)

<b>Reports</b>	
Annual Certification of Compliance	40 CFR 63.11509(c)
Report of Deviations	40 CFR 63.11509(d)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of notifications	40 CFR 63.10 40 CFR 63.11509(e) (1)
Records that demonstrate continuous compliance	40 CFR 63.10 40 CFR 63.11509(e) (3)
Monitoring/inspection information	40 CFR 63.10
SSM reports	40 CFR 63.10(b)(2) (i)
Occurrence and duration of malfunctions	40 CFR 63.10(b)(2) (ii)
All required maintenance performed on control and monitoring equipment	40 CFR 63.10(b)(2) (iii)
Excess emissions reports	40 CFR 63.10(e)(3)
Annual compliance certifications	40 CFR 63.11509(c)

### 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.
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 Integrated Compliance Information System (ICIS) and ECHO.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

### **5(c) Small Entity Flexibility**

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal).

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

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.



### 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 64,315 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### 6(b) Estimating Respondent Costs

#### (i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent <sup>1</sup>	(C) Number of New Respondents <sup>1</sup>	(D) Total Capital/Startup Cost, (BXC) <sup>2</sup>	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
Standard 4-drawer File Cabinet	\$25.80	322.22	\$8,314	\$0	322	\$0

<sup>1</sup> The annualized cost per cabinet is \$25.80. Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost.  $CRF = i \times (1+i)^t / ((1+i)^t - 1)$  where  $i$  = interest rate (%) and  $t$  = equipment life (years).  $CRF = 0.1098$ . Cabinets are assumed to have a 15-year life, 7% interest.

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

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

The total operation and maintenance (O&M) costs for this ICR are \$0. This is the total of column G.

The average, annual cost for both capital/startup costs and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$8,314. 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 \$30,357.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 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. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal).

### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

Based on our research for this ICR, on average over the next three years, approximately 2,900 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents <sup>2</sup>	(E) Number of Respondents (E=A+B+C-D)
1	0	145	2,755	0	2,900
2	0	145	2,755	0	2,900
3	0	145	2,755	0	2,900
Average	0	145	2,755	0	2,900

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

<sup>2</sup> Column D is subtracted to avoid double-counting respondents.

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
Initial Notification of Applicability	0	1	N/A	0
Notification of Compliance Status	0	1	N/A	0
Annual Compliance Certification	145	1	N/A	145
Annual Report of Deviations	145	1	N/A	145
			Total	290

<sup>1</sup> The 2,900 existing plants would be required to prepare an annual compliance certification every year. They would only submit the certifications if a deviation occurred; assuming that 5 percent of the plants experience a deviation, the number of compliance certifications submitted will be  $(2,900 \times 0.05) = 145$ .

The number of Total Annual Responses is 290.

The total annual labor costs are \$6,296,653. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

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

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

The total annual labor hours are 64,315 hours at a cost of \$6,296,653. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plating and Polishing Area Sources)(Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 222 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are 8,314. 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 667

labor hours at a cost of \$30,357. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal).

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

There is an increase of 31,208 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. The change in burden and cost estimates occurred as a result of updating the burden tables to accurately reflect the reporting and recordkeeping requirements of the rule. The previous ICR did not correctly account for changes in burden after the initial three-year compliance period of the rule. Instead, it continued to assume that all existing respondents will have one-time notification requirements, and that only one-third of respondents will be subject to the annual reporting requirements each year. The corrections result in several changes, including a decrease in initial notification requirements but an increase in the number of annual certification and deviation reports. The most notable net result is an increase in the respondent labor hours and cost and a decrease in the number of responses.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 222 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-2014-0097. 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-2014-0097 and OMB Control Number 2060-0623 in any correspondence.

### **Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>a</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting requirements								
A. Read instructions <sup>b</sup>	4	1	4	0	0	0	0	\$0
B. Required activities								
Initial Notification of Applicability <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of Compliance Status <sup>d</sup>	4	1	4	0	0	0	0	\$0
Annual Compliance Certification <sup>e</sup>	2	1	2	2,900	5,800	290	580	\$653,010.40
Annual Report of Deviations <sup>f</sup>	2	1	2	145	290	14.5	29	\$32,650.52
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write Report	See 4B							
<b>Subtotal for Reporting Requirements</b>						<b>7,004</b>		<b>\$685,660.92</b>
5. Recordkeeping requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information	N/A							
Records of all information required by standards <sup>g</sup>	0.33	52	17.16	2,900	49,764	2488.2	4976.4	\$5,602,829.23
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose	0.25	1	0.25	290	72.5	3.63	7.25	\$8,162.63

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>a</sup>
information <sup>h</sup>								
I. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>57,312</b>		<b>\$5,610,991.86</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>64,315</b>		<b>\$6,296,652</b>

### Assumptions

<sup>a</sup> This ICR uses the following labor rates: \$128.02 for managerial labor, \$101.05 for technical labor, and \$51.37 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>b</sup> There are an estimated 2,900 existing plating and polishing plants and no new facilities are expected. We assume that all facilities have already read the rule during the initial rule implementation phase.

<sup>c</sup> Each of the 2,900 existing plants noted above would have already submitted an initial notification. Since there are no new facilities expected, the number of respondents required to submit an initial notification is 0.

<sup>d</sup> Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate compliance date. Since there are no new facilities expected, the number of respondents required to submit a notice of compliance status is 0.

<sup>e</sup> The 2,900 existing plants would be required to prepare an annual compliance certification every year. However, they would only submit the certifications if a deviation occurred; assuming that 5 percent of the plants experience a deviation, the number of compliance certifications submitted will be  $(2,900 \times 0.05) = 145$ .

<sup>f</sup> Assumes that 5% of existing facilities would have to submit a report of deviations, or  $(2,900 \times 0.05) = 145$ .

<sup>g</sup> It is assumed that 0.33 hr (20 minutes) per week will be required per facility for recordkeeping.

<sup>h</sup> Annual transmittals would include submission of annual compliance certifications (145) and reports of deviations (145) for 5% of one-third of 2,900 facilities, so  $(2,900 \times 0.05) \times 2 = 145 \times 2 = 290$  respondent.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Plating and Polishing Area Sources (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Report Review:								
Initial Notification of Applicability <sup>c</sup>	1	1	1	0	0	0	0	\$0.00
Notification of Compliance Status <sup>d</sup>	2	1	2	0	0	0	0	\$0.00
Annual Compliance Certification <sup>e</sup>	2	1	2	145	290	14.5	29	\$15,178.60
Annual Report of Deviations <sup>f</sup>	2	1	2	145	290	14.5	29	\$15,178.60
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>667</b>		<b>\$30,357</b>

**Assumptions**

<sup>a</sup> This ICR uses the following average hourly labor rates: \$62.9 for managerial (GS-13, Step 5, \$39.31 +60%), \$46.67 (GS-12, Step 1, \$29.17 + 60%) for technical and \$25.25 (GS-6, Step 3, \$15.78 + 60) for clerical. These rates are from the Office of Personnel Management (OPM) 2014 General Schedule, which excludes locality rates of pay. These rates have been increased by 60 percent to account for the benefit packages available to government employees.

<sup>b</sup> Assumes no new plants in the next three years.

<sup>c</sup> Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate compliance date. Since there are no new facilities expected, the number of respondents required to submit a notice of compliance status is 0.

<sup>d</sup> The 2,900 existing plants would be required to prepare an annual compliance certification; any plant that experiences a deviation will have to submit the compliance certification; assuming 5 percent of the plants experience a deviation during the three year ICR period, the number of submittals would be  $(2,900 \times 0.05) = 145$ .

<sup>e</sup> Assumes that 5% of existing facilities would have to submit a report of deviations, or  $(2,900 \times 0.05) = 145$ .