

Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furnit

BURDEN ITEM	Hours/ Occurrence (A)	Occurrences/ Year (b)	Hours/Year (C=AxB) (C)
1. APPLICATIONS	N/A		
2. SURVEY AND STUDIES	N/A		
3. REPORTING REQUIREMENTS			
a. Familiarize with rule requirement	1	1	1
b. Required Activities			
Initial Performance Tests	60	1	60
Repeat Performance Tests	60	0.2	12
c. Gather Existing Information	See 3b		
d. Write Report			
Notification of Construction/ Reconstruction	2	1	2
Notification of Initial Performance Test	2	1	2
Notification of Actual Startup	2	1	2
Report of Performance Test	See 3b		
Semiannual Report ^c	8	2	16
Excess Emissions Report ^d	16	2	32
Subtotal for Reporting Requirements			
4. RECORDKEEPING			
a. Familiarize with rule requirement	See 3b		
b. Plan Activities	See 3b		
c. Implement Activities (Monthly Performance Test) ^e	1	12	12
d. Develop Record System	N/A		
Records of Operating Parameter ^f	0.25	350	87.5
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST			
Total Capital/O&M Costs (rounded[†])			
Grand Total (Labor and Capital/O&M Costs) (rounded[†])			

Assumptions:

^a This ICR uses the following labor rates: \$129.44 per hour for Executive, Administrative, and Professional labor, and \$10.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, “Occupational and Industry group.” The rates are from “column 1, Total Compensation.” These rates are based on the 2010 compensation packages available to those employed by private industry.

^b We have assumed that there are approximately 400 respondents, with no additional new or departing respondents over the 2-year period.

^c We have assumed that each respondent will take eight hours twice per year to complete the semiannual report.

^d We have assumed that 20 percent of respondents will each take 16 hours twice per year to complete the excess emissions report.

^e We have assumed that each respondent will take one hour once per month to record monthly performance test results.

^f We have assumed that each respondent will take 0.25 hours per day over 350 days per year to develop the recordkeeping system.

[†]Totals have been rounded to 3 significant figures. Figures may not add exactly due to rour

ure Coating (40 CFR Part 60, Subpart EE) (Renewal)

Respondents/ Year ^b (D)	Technical Person Hours (E=CxD) (E)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year ^a (F)

400	400	20	40	\$46,258.20
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
400	6,400	320	640	\$740,131.20
80	2,560	128	256	\$296,052.48
	10,764			\$1,082,442

400	4,800	240	480	\$555,098.40
400	35,000	1,750	3,500	\$4,047,592.50
	45,770			\$4,602,691
	56,500			\$5,690,000
				\$840,000
				\$6,530,000

Managerial (per hour)	Technical (per hour)	Clerical (per hour)
\$129.93	\$103.97	\$51.79

59 hr/resp

nd Managerial labor; \$103.97 per hour for Technical labor, and \$51.79
Bureau of Labor Statistics, June 2014, “Table 2. Civilian Workers, by
The rates have been increased by 110% to account for the benefit

reconstructed sources becoming subject to the rule over the next three

semiannual report.

complete the excess emissions reports.

ily performance test.

to keep record of operating parameters.

ding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (a)	Occurrences/Plant/Year (B)	EPA Hours/Year (C=A*B) (C)
INITIAL PERFORMANCE TESTS			
New Plant	24	1	24
REPEAT PERFORMANCE TEST			
New Plant	24	0.2	4.8
REPORT REVIEW			
New Plants			
Notification of Construction	2	1	2
Notification of Initial Startup	0.5	1	0.5
Notification of Actual Startup	0.5	1	0.5
Test	0.5	1.2	0.6
Review Test Results	8	1.2	9.6
Existing Plants			
Semianual Reports	2	2	4
Report ^c	2	2	4
TOTAL ANNUAL BURDEN AND COST (rounded) ^d			

Assumptions

^a This cost is based on the following labor rates: Managerial rate of \$62.90 (GS-13, Step 5, \$39.3 Clerical rate of \$25.25 (GS-6, Step 3, \$15.78 + 60%). The rates have been increased by 60 percent. These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which

^b We have assumed that it will take two hours twice per year to review the semiannual report.

^c We have assumed that EPA will take two hours twice per year to review each excess emissions report.

^d Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

DWang:

Changed from: "We have assumed that 20 percent of existing plants will each take two hours twice per year to review the excess emissions reports."

Coating (40 CFR Part 60, Subpart EE) (Renewal)

Plants/Year (D)	Technical Person Hours (E=CxD) (E)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year ^a (F)
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
0	0	0	0	\$0.00
400	1600	80	160	\$83,744.00
80	320	16	32	\$16,748.80
		2,210		\$100,000

Managerial (per hour)	Technical (per hour)
\$62.90	\$46.67

^a1 + 60%), Technical rate of \$46.67 (GS-12, Step 1, \$29.17 + 60%), and
to account for the benefit packages available to government employees.
excludes locality rates of pay.

reports. We also assumed that 20 percent of existing plants will submit excess emissions reports.

of

Clerical (per hour)
\$25.25

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M
Temperature	4,400	0	\$0	\$2,100	400

(G)
Total O&M
(E x F)
\$840,000