

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal),  
EPA ICR Number 1966.06, OMB Control Number 2060-0546.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing were proposed on July 14, 2000, promulgated on August 22, 2001, and amended on October 3, 2001. These regulations apply to both existing and new boat manufacturing facilities that are a major source of hazardous air pollutant (HAP) emissions. This regulation covers resin and gel coat operations at fiberglass boat manufacturers, paint and coating operations at aluminum boat manufacturers, and carpet and fabric adhesive operations at all boat manufacturers. Air toxics are released during application and curing from the resins, gel coats, adhesives, coating, and solvents used in boat manufacturing. 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 VVVV.

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

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

Based on our consultations with industry representatives, there is an average of 1.7 affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 144 respondents (143 private and 1 government entities) per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. Of the 144 respondents, we expect that the one government entity will choose to comply by limiting the HAP content of its fiberglass or aluminum boat manufacturing processes and operations. The one facility already has an add-on

control device and will comply with the add-on control device standards. The remaining respondents will comply by using pollution prevention measures.

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

With the exception of one facility, all of the boat manufacturing plants in the United States are owned and operated by the boat manufacturing industry (i.e. the “Affected Public”). An additional facility is owned and operated by the Federal government (e.g., the U.S. Marine Corps). With this one exception, they are all privately-owned, for-profit businesses. The “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal).

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

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

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

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

In the Administrator's judgment, HAP emissions from boat manufacturing processes and operations either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart VVVV.

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

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards 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 that the standards are being met. The performance test may also be observed.

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

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart VVVV.

#### **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 either 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 (81 FR 26546) on May 3, 2016. 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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Marine Manufacturers Association, at (202) 737-9757; and the American Boatbuilders Association, Incorporated, at (770) 792-3070.

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 these 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 these standards 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 boat manufacturing facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards are SIC 3732 and 3731, which correspond to the North American Industry Classification System (NAICS) 336612 for Boat Building.

<b>Standard (40 CFR Part 63, Subpart VVVV)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Boat Building	3732	336612
	3731	336612

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

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

In this ICR, all the data that is recorded or reported is required by the NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV).

A source must make the following reports:

<b>Notifications</b>	
Initial notification for existing sources	63.9(b)(2)
Notification to construct/reconstruct	63.9(b)(4)(i)
Notification of actual startup date	63.9(b)(4)(v)
Request for extension of compliance	63.9(c)
Notification that source is subject to special compliance requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity and visible emission observation	63.9(f)
Notification of sources with continuous monitoring systems	63.9(g)
Notification of compliance status	63.9(h)

<b>Reports</b>	
First compliance report	63.5764(b)(1)
Semiannual compliance report	63.5764(b)(3)
Startup, shutdown, and malfunction plan	63.5764(e)

A source must keep the following records:

<b>Recordkeeping</b>	
Copy of each notification a report as submitted and associated documentation	63.5767(a-b)
Record of weighted-average organic HAP content	63.5767(c)
Recordkeeping relevant to startup, shutdown, and malfunction periods and continuous monitoring system performance evaluations	63.5767(d)
Records of monthly inspections and repairs	63.5755
Maintain records for 5 years	63.5764(b)

### 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.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 18, 25A, and 311 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management****5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

### **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 standards, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is 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**

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

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



The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal).

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

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

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 23,500 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “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 standards 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 these regulations. 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**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous parameter monitors	N/A	N/A	N/A	\$800	1	\$800

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

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

The total operation and maintenance (O&M) costs for this ICR are \$800. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$800.

**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 such activities 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 \$109,000.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (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 144 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 144 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	144	0	0	144
2	0	144	0	0	144
3	0	144	0	0	144
Average	0	144	0	0	144

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 144.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Initial notification that existing sources are subject to the standard	0	1	0	0
Notification of intent to construct and application for approval of construction	0	1	0	0
Notification of start of construction	0	1	0	0
Notification of anticipated startup date	0	1	0	0
Notification of actual startup date	0	1	0	0
Notification of compliance status	0	1	0	0
Semiannual compliance reports of all sources	144	2	0	288
Quarterly compliance report	0	4	0	0
Annual compliance report	1	1	0	1
			<b>Total</b>	<b>289</b>

The number of Total Annual Responses is 289.

The total annual labor costs are \$2,430,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (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 23,500 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical

tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 81 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$800. 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 2,360 labor hours at a cost of \$109,000. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

However, there is an adjustment increase in the respondent burden costs due to an increase in labor rate. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs. This ICR also rounds all calculated total values to 3 significant figures.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 81 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously-applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data

sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0339. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0339 and OMB Control Number 2060-0546 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 Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) Occurrence s per respondent per year	(C) Person hour per respondent per year (C=AxB)	(D) Responde nts per year	(E) Technic al person hour per year (E=CxD )	(F) Managere al person hour per year (Ex0.05)	(G) Clerical person hour per year (Fx0.1)	(H) Total Cost per Year <sup>a</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Familiarize with regulatory requirements <sup>c</sup>	25	1	25	144	3,600	180	360	\$427,134.60
4. Required activities for sources with add-on control devices <sup>d</sup>								
a. Initial performance test and report	410	1	410	0	0	0	0	\$0
b. Establish operating parameters	See 4A							
c. Prepare startup, shutdown, and malfunction plan	40	1	40	0	0	0	0	\$0
5. Required activities for sources using pollution prevention measures <sup>e, f</sup>								
a. Develop recordkeeping system								
1) Fiberglass manufacturing operations	22	1	22	0	0	0	0	\$0
2) Adhesive operations	1	1	1	0	0	0	0	\$0
3) Aluminum coating operations	6	1	6	0	0	0	0	\$0
b. Enter information into recordkeeping system								
1) Fiberglass manufacturing operations <sup>g</sup>	84	1	84	144	12,096	604.8	1,209.6	\$1,435,172.26

Burden item	(A) Person hours per occurrence	(B) Occurrence s per respondent per year	(C) Person hour per respondent per year (C=AxB)	(D) Responde nts per year	(E) Technic al person hour per year (E=CxD )	(F) Managere al person hour per year (Ex0.05)	(G) Clerical person hour per year (Fx0.1)	(H) Total Cost per Year <sup>a</sup>
2) Adhesive operations <sup>h</sup>	12	1	12	144	1,728	86.4	172.8	\$205,025
3) Aluminum coating operations <sup>i</sup>	22	1	22	16	352	17.6	35.2	\$41,764.27
c. Work practice requirements <sup>j</sup>	2	12	24	16	384	19.2	38.4	\$45,561.02
6. Create information	See 5B							
7. Gather information	See 5B							
8. Notification requirements								
a. Initial notification that existing sources are subject to the standard <sup>k</sup>	24	1	24	0	0	0	0	\$0
b. Notification for new major sources								
1) Intent to construct and application for approval of construction	80	1	80	0	0	0	0	\$0
2) Start of construction	2	1	2	0	0	0	0	\$0
3) Anticipated startup date	2	1	2	0	0	0	0	\$0
4) Actual startup date	2	1	2	0	0	0	0	\$0
c. Request for compliance extension	N/A							
d. Notification of special compliance requirements	N/A							
e. Notification of performance tests	2	1	2	0	0	0	0	\$0
f. Notification of compliance status	4	1	4	0	0	0	0	\$0



Burden item	(A) Person hours per occurrence	(B) Occurrence s per respondent per year	(C) Person hour per respondent per year (C=AxB)	(D) Responde nts per year	(E) Technic al person hour per year (E=CxD )	(F) Managere al person hour per year (Ex0.05)	(G) Clerical person hour per year (Fx0.1)	(H) Total Cost per Year <sup>a</sup>
9. Reporting requirements								
a. Semiannual compliance reports for all sources <sup>1</sup>	8	2	16	144	2,304	115.2	230.4	\$273,366.14
b. Additional reports for sources with add-on control devices								
1) Quarterly compliance report for sources with exceedances	16	4	64	0	0	0	0	\$0
2) Request to return to semiannual compliance Reporting <sup>m</sup>	8	1	8	1	8	0.4	0.8	\$949.19
3) Control device performance test report	See 4A							
4) Operating range for monitored parameters	See 4B							
5) Startup, shutdown, malfunction	8	1	8	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>					<b>23,543</b>			<b>\$2,428,972.09</b>
10. Recordkeeping requirements								
a. Familiarize with regulatory requirements	See 3							
b. Plan and develop record system	See 5A							
c. Record information	See 5B							
d. Records for area sources not subject to the	N/A							

Burden item	(A) Person hours per occurrence	(B) Occurrence s per respondent per year	(C) Person hour per respondent per year (C=AxB)	(D) Responden ts per year	(E) Technic al person hour per year (E=CxD )	(F) Managerei al person hour per year (Ex0.05)	(G) Clerical person hour per year (Fx0.1)	(H) Total Cost per Year <sup>a</sup>
standard								
11. Time to train personnel	N/A							
12. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>b</sup></b>						<b>23,500</b>		<b>\$2,430,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii))</b>								<b>\$800</b>
<b>GRAND TOTAL (rounded)<sup>c</sup></b>								<b>\$2,430,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 144 existing sources. There will be no additional sources over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 per hour for Technical labor, and \$52.77 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2012, "Table 2. Civilian Workers, by Occupational and Industry group". The rates are from column 1, "Total Compensation". The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that it will take the same length of time (25 hours) for both fiberglass and aluminum boat manufacturers to review the rules for each facility.

<sup>d</sup> We have assumed that sources with add-on control devices will be required to perform initial performance test and report, and to prepare startup, shutdown, and malfunction plan.

<sup>e</sup> We have assumed that all of the existing facilities except for one are complying with the regulations by using pollution prevention measures.

<sup>f</sup> We have assumed that there will be no new sources expected over the three-year period of this ICR.

<sup>g</sup> We have assumed that each of the respondents will take 84 hours to complete the fiberglass manufacturing operations.

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) Occurrence s per respondent per year</b>	<b>(C) Person hour per respondent per year (C=AxB)</b>	<b>(D) Responden ts per year</b>	<b>(E) Technic al person hour per year (E=CxD )</b>	<b>(F) Managerei al person hour per year (Ex0.05)</b>	<b>(G) Clerical person hour per year (Fx0.1)</b>	<b>(H) Total Cost per Year <sup>a</sup></b>
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<sup>h</sup> We have assumed that each respondent will take 12 hours to complete the adhesive operations requirements.

<sup>i</sup> We have assumed that 16 respondents will take 22 hours each to complete the aluminum coating operations requirements.

<sup>j</sup> We have assumed that 16 respondents will take 2 hours each to complete the work practice requirements.

<sup>k</sup> We have assumed that all of the existing respondents will each take 24 hours to complete initial notification requirements.

<sup>l</sup> We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

<sup>m</sup> We have assumed that one respondent will request to return to semiannual compliance reporting.

<sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

**“Affected Public” Broken Down According to Number of Facilities in Each Category**

<b>Respondents</b>	<b>Number of Respondents</b>	<b>Responses</b>	<b>Capital/Startup &amp; O&amp;M Cost</b>	<b>Labor Costs</b>
Private Sector (Business for-profits)	143	286	\$0	\$2,412,104
Federal Government	1	3	\$800	\$16,868
<b>Total</b>	<b>144</b>	<b>289</b>	<b>\$800</b>	<b>\$2,430,000 (rounded)</b>

**Reporting and Recordkeeping Hours for Each Category**

<b>Respondents</b>	<b>Total Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Labor Hours</b>
Private Sector (Business for-profits)	23,380	0	23,380

<b>Respondents</b>	<b>Total Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Labor Hours</b>
Federal Government	163	0	163
<b>Total</b>	<b>23,543</b>	<b>0</b>	<b>23,500 (rounded)</b>

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV) (Renewal)**

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year	(C) EPA hours per year (C=AxB)	(D) Plants per year (a)	(E) Technica l hours per year (E=CxD)	(F) Manageria l hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year <sup>a</sup>
1. Read instructions	25	1	25	0	0	0	0	\$0
2. Enter and update information into agency recordkeeping system <sup>c</sup>	4	1	4	144	576	28.8	57.6	\$30,760.70
3. Notification review								
a. Review initial notification for existing sources <sup>d</sup>	2	1	2	0	0	0	0	\$0
b. Notification for new major sources <sup>e</sup>								
1. Review intent to construct and application to construct	12	1	12	0	0	0	0	\$0
2. Start of construction	2	1	2	0	0	0	0	\$0
3. Anticipated startup date	2	1	2	0	0	0	0	\$0
4. Actual startup date	2	1	2	0	0	0	0	\$0
c. Review request for compliance extension	N/A							
d. Review special compliance requirements	N/A							
e. Review initial performance test and test plan	20	1	20	0	0	0	0	\$0
f. Review compliance status <sup>f</sup>	2	1	2	144	288	14.4	28.8	\$15,380.35
g. Area sources not subject to standard	N/A							
h. Review waiver application	N/A							
4. Reporting requirements								
a. Semiannual compliance reports for all	4	2	8	144	1,152	57.6	115.2	\$61,521.41

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year	(C) EPA hours per year (C=AxB)	(D) Plants per year (a)	(E) Technica l hours per year (E=CxD)	(F) Manageria l hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year <sup>a</sup>
sources <sup>g</sup>								
b. Reports for sources with add-on control devices								\$0
1. Quarterly compliance report for source with exceedances <sup>h</sup>	4	4	16	0	0	0	0	\$0
2. Request to return to semiannual compliance reporting <sup>i</sup>	4	2	8	1	8	0.4	0.8	\$427.23
3. Review control device performance test report and operating range	20	1	20	1	20	1	2	\$1,068.08
4. Review startup, shutdown, malfunction reports <sup>j</sup>	4	1	4	1	4	0.2	0.4	\$213.62
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>k</sup></b>						<b>2,360</b>		<b>\$109,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 144 existing sources. There will be no additional sources over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$47.62 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.76 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2012 General Schedule", which excludes locality rates of pay.

<sup>c</sup> We have assumed that 144 respondents will each take 4 hours to enter and update information into agency recordkeeping system.

<sup>d</sup> We have assumed that all existing sources will be in compliance in the third year.

<sup>e</sup> We have assumed that there will be not new sources over the three-year period of this ICR.

<sup>f</sup> We have assumed that it will take 2 hours to review the compliance status notification.

<sup>g</sup> We have assumed that it will take four hours two times per year to review the semiannual compliance report.

<sup>h</sup> we have assumed that 20 percent of the quarterly compliance reports will be reviewed for exceedances.

<sup>i</sup> We have assumed that two respondents will request to return to semiannual compliance reporting.

<sup>j</sup> We have assumed that it will take 4 hours to review the startup, shutdown, malfunction report.

<sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

