

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION**

**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Large**

**ATTACHMENT 1**

**TABLES 1, 2, 3, and 4**

Annual Respondent Burden and Cost of Recordkeeping and Reporting R

Summary of Annual Respondent Burden and Cost of Recordkeeping and

**ATTACHMENT 2**

**TABLES 5, 6, 7, and 8**

Annual Agency Burden and Cost of Recordkeeping and Reporting Requi

Summary of Annual Agency Burden and Cost of Recordkeeping and Rej

**F**  
**AGENCY**

**Appliances (40 CFR Part 63, Subpart NNNN) (Amendments)**

Requirements for the Surface Coating of Large Appliances NESHAP – Years 1-3 (Amendments)

Reporting Requirements for the Surface Coating of Large Appliances NESHAP (Amendments)

Requirements for the Surface Coating of Large Appliances NESHAP - Year 1-3 (Amendments)

Reporting Requirements for the Surface Coating of Large Appliances NESHAP (Amendments)

<b>Respondent Wages (\$2016)</b>		
<b>Category (1)</b>	<b>Hourly Wage (2)</b>	<b>Loaded Wage (3)</b>
Managerial	\$71.25	\$149.63
Technical	\$48.11	\$101.03
Clerical	\$22.08	\$46.37
Footnotes:		
<p>(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment and Wage Estimates 335200 - Household Appliance Manufacturing," found here:  <a href="https://www.bls.gov/oes/current/naics4_335200.htm">https://www.bls.gov/oes/current/naics4_335200.htm</a></p> <p>(2) Selected "mean hourly wage" in the table referenced in footnote 1.</p> <p>(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.</p>		

<b>EPA Wages (\$2017)</b>		
<b>Category (1)</b>	<b>Hourly Wage</b>	<b>Wage With Fringe &amp; Overhead (2)</b>
(GS- 13, step 5) - Managerial	\$40.50	\$64.80
(GS- 12, step 1) - Technical	\$30.05	\$48.08
(GS-6, step 3) - Clerical	\$16.26	\$26.02
Footnotes:		
<p>(1) The hourly wage for each category is found here:  <a href="https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary">https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary</a></p> <p>(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.</p>		

**Table 1: Annual Respondent Burden and Cost – NESHAP for Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**

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 (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost Per year <sup>b</sup>
1 Familiarization with rule requirements <sup>c</sup>	4	1	4	114	456	22.8	45.6	\$51,596
2 Plan activities <sup>d</sup>	8	1	8	114	912	45.6	91.2	\$103,192
3 Training <sup>d</sup>	8	1	8	114	912	45.6	91.2	\$103,192
4 Create, test, and research and development	1	0	0	-	0	0	0	\$0
5 Gather information, monitor, and inspect <sup>e</sup>	12	12	144	114	16,416	820.8	1641.6	\$1,857,455
6 Process/compile and review <sup>f</sup>	8	12	96	114	10,944	547.2	1094.4	\$1,238,303
7 Complete reports <sup>g</sup>	8	2	16	114	1,824	91.2	182.4	\$206,384
<b>Subtotal for Reporting Requirements</b>					<b>36,184</b>			<b>\$3,560,122</b>
8 Record/disclose <sup>h</sup>	1	2	2	114	228	11.4	22.8	\$25,798
9 Store/file	0.25	2	0.5	114	57	2.85	5.7	\$6,449
10 LDAR reporting and recordkeeping	0	0	0	0	0	0	0	\$0
<b>Subtotal for Recordkeeping Requirements</b>						<b>196</b>		<b>\$32,247</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>								<b>\$3,590,000</b>
<b>Capital and O&amp;M Cost <sup>i</sup></b>								<b>\$680,000</b>
<b>TOTAL COST</b>								<b>\$4,270,000</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 114. There will be four additional new sources that will become subject to the rule over the three-year period of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$149.62 per hour for Executive, Administrative, and Managerial labor; \$101.03 per hour for Technical labor, and \$46.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates 335200 - Household Appliance Manufacturing." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We have assumed that each respondent will take 4 hours to read the rule and instructions.
- <sup>d</sup> We have assumed that it will take eight hours for each respondent to plan activities and eight hours for training.
- <sup>e</sup> We have assumed that each respondent will take twelve hours, twelve times per year to complete task.
- <sup>f</sup> We have assumed that each respondent will take eight hours twelve times per year to complete task.
- <sup>g</sup> We have assumed that each respondent will take eight hours twice per year to complete reports.
- <sup>h</sup> We have assumed that each respondent will take one hour two times per week to record and disclose information.
- <sup>i</sup> We have assumed that four new respondents install a \$16,000 CEM and annual O&M costs are \$5,400 for each respondent. For additional information see ICR Reference No. 201509-2060-013.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
1 Initial performance test <sup>c</sup>	24	1	24	4	96	4.8	9.6	\$5,176
2 Repeat performance test <sup>d</sup>	24	0.2	4.8	4	19.2	0.96	1.92	\$1,035
3 Report review								
a) Initial notification <sup>e</sup>	8	1	8	4	32	1.6	3.2	\$1,725
b) Notification of performance test <sup>e</sup>	8	1	8	4	32	1.6	3.2	\$1,725
c) Notification of compliance status <sup>e</sup>	8	1	8	4	32	1.6	3.2	\$1,725
d) Semiannual reports <sup>f</sup>	12	2	24	114	2,736	136.8	273.6	\$147,529
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					<b>3,390</b>			<b>\$158,918</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 114. There will be four additional sources that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Step3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 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.

<sup>c</sup> We have assumed that it will take 24 hours to complete the task for each respondent.

<sup>d</sup> We have assumed that tests will fail 20% of the time and that it will take 24 hours to complete the task.

<sup>e</sup> We have assumed that it will take 8 hours to complete the task for each respondent.

<sup>f</sup> We have assumed that it will take 12 hours to complete the task for each respondent.

**Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting  
Year 1 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements <sup>c</sup>	4	1	4
2 Plan activities	0	0	0
3 Training <sup>d</sup>	8	1	0
4 Add-on control performance test <sup>e</sup>	30	1	30
Repeat failed performance test <sup>f</sup>	30	1	30
5 Gather info, monitor, inspect, and determine compliance <sup>g</sup>	12	12	144
6 Process/compile and review <sup>h</sup>	8	12	96
7 Complete notifications and reports <sup>i</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
8 Record/transmit/disclose <sup>j</sup>	2	52	0
Due To Proposed Revisions <sup>k</sup>	8	2	16
9 Store/file <sup>l</sup>	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>			
<b>TOTAL COST</b>			

**Assumptions:**

<sup>a</sup> It is assumed that there are ten sources that are subject to the standard, and no additional new sources will become subject to the standard.

<sup>b</sup> This ICR uses the following labor rates: \$149.62 per hour for Executive, Administrative, and Managerial labor; \$101.03 per hour for Professional labor; and \$75.00 per hour for all other labor. Source: U.S. Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Statistics." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours to complete this item.

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing would adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

<sup>f</sup> Performance testing is not currently required after the initial performance test.

<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in the current ICR for this item. The proposed RTR amendments do not impact this item.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours to complete this item.

<sup>i</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take eight hours to complete this item.

<sup>j</sup> The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is requesting comment on whether this would increase labor. It is assumed that this will not increase labor.

<sup>k</sup> We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting and include time to become familiar with the systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the systems in year one.

<sup>l</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half a

<sup>m</sup> EPA is proposing to require the use of high efficiency spray guns where the source is not using add-on controls. Because we expect any facilities will have to switch to high efficiency application methods.

**ng Requirements for the Surface Coating of Large Appliances NESHAP  
dments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year <sup>a</sup>	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year <sup>b</sup>
10	10	40	2	4	46	\$4,526
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>46</b>						<b>\$4,526</b>
0	0	0	0	0	0	\$0
10	20	160	8	16	184	\$18,104
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>184</b>						<b>\$18,104</b>
						<b>\$23,000</b>
						<b>\$0</b>
						<b>\$23,000</b>

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age Estimates 335200 - Household Appliance Manufacturing." The rates are from column 1, "Total  
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'A is proposing to require sources to electronically submit semiannual reports starting 2 years after the effective

ted with elimination of the SSM exemption include time for re-evaluating previously developed SSM record  
in CEDRI and the semi-annual reporting form. Two responses with 8 hours per response.



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**Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting  
Year 2 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements <sup>c</sup>	4	1	4
2 Plan activities	0	0	0
3 Training <sup>d</sup>	8	1	0
4 Add-on control performance test <sup>e</sup>	30	1	30
Repeat failed performance test <sup>f</sup>	30	1	30
5 Gather info, monitor, inspect, and determine compliance <sup>g</sup>	12	12	144
6 Process/compile and review <sup>h</sup>	8	12	96
7 Complete notifications and reports <sup>i</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
8 Record/transmit/disclose <sup>j</sup>	2	52	0
Due To Proposed Revisions <sup>k</sup>	8	1	8
9 Store/file <sup>l</sup>	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>			
<b>TOTAL COST</b>			

**Assumptions:**

<sup>a</sup> It is assumed that there are ten sources that are subject to the standard, and no additional new sources will become subject to the standard.

<sup>b</sup> This ICR uses the following labor rates: \$149.62 per hour for Executive, Administrative, and Managerial labor; \$101.03 per hour for Professional labor; and \$74.28 per hour for all other labor. Source: U.S. Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Statistics." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours to complete this item.

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether performance testing adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

<sup>f</sup> Performance testing is not currently required after the initial performance test.

<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in the proposed RTR amendments do not impact this item.

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<sup>k</sup> We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the system.

<sup>l</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half a

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**ng Requirements for the Surface Coating of Large Appliances NESHAP  
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(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year <sup>a</sup>	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year <sup>b</sup>
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>0</b>						<b>\$0</b>
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>0</b>						<b>\$0</b>
						<b>\$0</b>
						<b>\$0</b>
						<b>\$0</b>
	0					<b>\$0</b>

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**Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting  
Year 2 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements <sup>c</sup>	4	1	4
2 Plan activities	0	0	0
3 Training <sup>d</sup>	8	1	0
4 Add-on control performance test <sup>e</sup>	30	1	30
Repeat failed performance test <sup>f</sup>	30	1	30
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7 Complete notifications and reports <sup>i</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
8 Record/transmit/disclose <sup>j</sup>	2	52	0
Due To Proposed Revisions <sup>k</sup>	8	1	8
9 Store/file <sup>l</sup>	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>			
<b>TOTAL COST</b>			

**Assumptions:**

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<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

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<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in the proposed RTR amendments do not impact this item.

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**ng Requirements for the Surface Coating of Large Appliances NESHAP  
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Respondents per year <sup>a</sup>	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year <sup>b</sup>
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>0</b>						<b>\$0</b>
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
<b>0</b>						<b>\$0</b>
						<b>\$0</b>
						<b>\$0</b>
						<b>\$0</b>
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**Table 4 - Summary of Annual Respondent Burden and Cost of Record Requirements for the Surface Coating of Large Appliances NES**

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	200	20	10	230	\$23,000
2	0	0	0	0	\$0
3	0	0	0	0	\$0
Total	200	20	10	230	\$23,000
Average	67	6.7	3.3	77	\$7,700

  

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	10	30	46	184	230
2	10	0	0	0	0
3	10	0	0	0	0
Total	10	30	46	184	230
Average	10	10.0	0	61	100

(a) = Average annual additional cost per respondent: \$770

**Accounting and Reporting  
HAP (Amendments)**

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$23,000
\$0	\$0
\$0	\$0
\$0	\$23,000
\$0	\$7,700
Hours per Response	Hours Per Respondent
8	23
0	0
0	0
8	23
2.7	7.7

**Table 5 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
NESHAP - Year 1 (Amendments)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are ten sources that are subject to the standard, and no additional new sources will

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$31.26 (GS-11, Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) Pay Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of record systems in year one.

**ing Requirements for the Surface Coating of Large Appliances  
(endments)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	10	40	2	4	\$2,157
<b>46</b>					<b>\$2,200</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic comment on whether performance testing should be required anytime a source plans to undertake an operational oring value.

ident.

irs, once a year to review the compliance stats for each respondent.

ours to review the test reports, twice a year for each respondent.

sts associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 6 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
NESHAP - Year 2 (Amendments)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are ten sources that are subject to the standard, and no additional new sources will

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$32.40 (GS-11, Step 5, \$20.25 + 60%), and Professional rate of \$16.26 (GS-9, Step 3, \$10.16 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) Pay Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of record systems in year one.

**ing Requirements for the Surface Coating of Large Appliances  
(endments)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
<b>0</b>					<b>\$0</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic comment on whether performance testing should be required anytime a source plans to undertake an operational oring value.

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sts associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 7 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
NESHAP - Year 3 (Amendments)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are ten sources that are subject to the standard, and no additional new sources will

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$31.26 (GS-11, Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) Pay Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to c

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting change that may adversely affect compliance with an applicable standard, operating limit, or parametric monit

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respon

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hou

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve h

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Co record systems in year one.



**ing Requirements for the Surface Coating of Large Appliances  
(endments)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
<b>0</b>					<b>\$0</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic comment on whether performance testing should be required anytime a source plans to undertake an operational oring value.

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sts associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Large Appliances NESHAP (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	40	2.0	4.0	46	\$2,200	\$0	\$2,200
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total	40	2.0	4.0	46	\$2,200	\$0	\$2,200
Average	13	0.7	1.3	15	\$700	\$0	\$700

Year	Number of Responses	Total Hours
1	10	46
2	0	0
3	0	0
Total	10	46
Average	3.3	15

(a)

(a) = Average annual hours per respondent: 4.6