

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title of the Information Collection

"National Volatile Organic Compound Emission Standards for Aerosol Coatings." The Environmental Protection Agency (EPA) tracking number for this information collection request (ICR) is 2289.04. This is a renewal of a continuing ICR, OMB No. 2060-0617, which is due to expire October 31, 2018.

(b) Short Characterization/Abstract

Compliance with the aerosol coatings rule was required by January 1, 2009. The final rule requires regulated entities to submit an Initial Notification to the U.S. Environmental Protection Agency (EPA) at least 90 days before the compliance date. The initial notification requests basic information about regulated entities, including contact information of the certifying official. Other required information includes: (1) a product date code system used to label products and the category code system, if the facility is not using the default category codes included in Table 1 of the rule; (2) a revised notification if there is a change in the information in the Initial Notification, except if it is a change in the volatile organic compounds (VOC) formulations submitted in its Initial Notification; (3) a revised notification if the manufacturer, for example, adds a new coating category, changes the product date code system or batch definition, or begins to use a VOC that is not listed in the rule; and (4) maintain compliance calculations for each of its aerosol coatings formulations, records of the date(s) the batch was manufactured, the volume of the batch, and the VOC formula for the formulation.

Records of the compliance calculations must be maintained for 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States, and the regulated entity must supply this information to the EPA within 60 days of a written request. Since calendar year 2011, each regulated entity must submit a triennial report. The triennial report would provide updated VOC formulation data and, for each VOC formulation, the total mass of each individual VOC or mixture used as ingredients in the aerosol coatings manufactured, imported, or distributed that year. This information must be provided only for the second year of the reporting cycle, which, in the case of the first report, was information from 2010. Subsequent reports will be required at 3-year intervals. In other words, a report containing data from 2013 will be due in 2014, a report containing data from 2016 will be due in 2017, and so forth.

New and existing regulated entities will have to submit an initial notification. Regulated entities will also be required to submit notifications of changes in the products or company information and to maintain records. In addition, regulated entities will be required to submit triennial reports of formulation data and VOC usage. Respondent and burden estimates are included in Tables 2 and 3.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection.

The EPA is charged under section 183 (e) of the Clean Air Act (CAA), as amended, to establish emission standards for aerosol coatings. Section 183(e) of the CAA requires the EPA to regulate consumer or commercial products that account for at least 80 percent of the VOC emissions, on a reactivity-adjusted basis, in areas that violate the national ambient air quality standards for ozone. The CAA also directs the EPA to divide the consumer or commercial products into four groups, and establish priorities for regulation until all four

groups are regulated. Of the 22 source categories identified and divided into four groups, the aerosol coatings source category is in Group III.

The information collection requirements are based on recordkeeping and reporting requirements. These recordkeeping and reporting requirements are specifically authorized by CAA section 114 (42 U.S.C. 7414). Initial notifications and reports, as described in this information collection request, are necessary to enable the Administrator to determine if the standards are being achieved. The emission standards require an initial notification report from all regulated entities to the EPA 90 days before the compliance date. The regulated entity is required to maintain compliance calculations for each of its aerosol coatings formulations. Records of these calculations must be maintained 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States. The retention of records for 5 years would allow the EPA to establish the compliance history of a regulated entity and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, the EPA has found that the most flagrant violators frequently have violations extending beyond the 5 years. The EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records, if records were retained for less than 5 years.

1 Respondents seeking a variance are required to submit an application which includes the grounds upon which the variance is being sought, the proposed date for coming into compliance, and a plan for achieving compliance. Similarly, some respondents may qualify for, and seek, either a small quantity manufacturer exemption or a compliance extension. The estimates for completing these reports are included in the estimates for the Initial Notification.

(b) Practical Utility/Users of the Data.

The data collected under this ICR are essential to ensure compliance with the rule and to evaluate its effectiveness. 1 Agency enforcement personnel will use the information collected to: (1) identify manufacturers and importers subject to the rule; (2) ensure that consumer products comply with the VOC content standards, and (3) better assess the efficacy of the reactivity-based approach, including the manner in which the program's requirements are being achieved. These activities are essential to compliance assurance.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication

The subject emission standards are delegated to the EPA and information is sent directly to the appropriate EPA Regional office. The EPA has not duplicated the recordkeeping and reporting requirements for regulated entities that may be subject to the rule covered under this ICR.

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

On April 18, 2018 the EPA published a notice in the *Federal Register* (83 FR 17175) titled, *Agency Information Collection Activities: Proposed Collection; Comment Request; National Volatile Organic Compound Emission Standards for Aerosol Coatings*. The purpose of the notice was to announce that the EPA was planning to submit this continuing ICR to OMB for review and approval, and to solicit comments on the proposed continued collection. Although EPA received 8 comments during the comment period, none of those comments were relevant to the proposed ICR.

(c) Consultations

Significant input and information was received from the affected industry, state and local governments, and environmental groups during development of the rule. In addition, in preparing to submit this ICR to OMB for renewal, the EPA contacted parties within the affected industry to obtain information on the universe of affected sources and feedback on accuracy of the burden estimates.

Table 1.
CONSULTATIONS

The American Coating Association (ACA) is a trade association whose membership includes much of the aerosol coatings industry. ACA and EPA have been in continued consultation on regarding the National Volatile Organic Compound Emission Standards for Aerosol Coatings. Three ACA representatives provided industry feedback on the reactivity factors, and provided specific examples and supporting documentation on why those reactivity factors should be revised.

Name	Representation
Dave Darling	American Coatings Association
Rhett Cash	American Coatings Association
Heidi McAuliffe	American Coatings Association

(d) Effects of Less Frequent Collection

This ICR includes the minimum requirements needed to demonstrate compliance with the aerosol coatings rule. The proposed rule requested comment on the feasibility and need for a requirement for regulated entities to submit to the agency their VOC formulations for each product or product formulation in the initial report and on a periodic basis thereafter. Numerous commenters provided input on the need, or lack of need, for additional reporting requirements, in general, and the annual reporting of formulation data, in particular. Some commenters, mostly aerosol industry representatives, contended that no additional periodic reporting was warranted. Others, particularly regulatory agencies and environmental groups, stated their belief that the rule is not enforceable without additional reporting. Based on this input and the EPA’s own review, the EPA has determined that initial reporting of formulation data and ongoing reporting on a triennial basis are needed. The initial reporting is needed to ensure that the rule is implementable as a practical matter. The triennial reporting will enable the EPA to better assess the efficacy of the reactivity-based approach, including the manner in which the programs requirements are being achieved.

(e) General Guidelines

1This ICR adheres to the guidelines for Federal data requesters, as provided at 5 CFR 1320.6 and does not exceed any of the OMB guidelines found 5 CFR 1320.5(d)(2).

(f) Confidentiality

All information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to the EPA policies set forth in title 40, chapter 1, part 2, subpart B – Confidentiality of Business Information (see 40 CFR part 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) Sensitive Questions

1No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered of sensitive nature are included in this information collection.

4. The Respondents and the Information Requested

(a) Respondent/NAICS Codes

1Respondents to this information collection are manufacturers, distributors and importers of aerosol coatings. These regulated entities fall within the North American Industry Classification System (NAICS) Code 32551, "Paint and Coating Manufacturing" and NAICS Code 325998, "All Other Miscellaneous Chemical Production and Preparation Manufacturing."

(b) Information Requested

(i) Data items. Regulated entities are required to maintain records of the following at the location specified in 40 CFR 59.511 (a)(4) for each product subject to the product-weighted reactivity limits:

Recordkeeping

- Product category;
- All product calculations;
- The product-weighted reactivity;
- Weight fraction of all ingredients including water, solids, each VOC and any compounds assigned a reactivity factor of zero, as specified in 40 CFR 59.505; and
- A copy of each notification submitted, the documentation supporting each notification and a copy of the label for each product.

Reporting

- Initial report (including small quantity manufacturer exemption requests);
- Supplemental report;
- Variance application; and
- Triennial report.

(ii) Respondent activities.

1The respondent activities required for all manufacturers and importers of regulated products are listed in Tables 2 and 3. Both new and existing sources must read the rule and understand the rule requirements. Respondents must also submit notifications and supplemental reports according to the requirements specified in the rule. Respondents must submit triennial reports of formulation and usage data. Each source must maintain all applicable records for 5 years.

5. The Information Collected—Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

The government recordkeeping and reporting costs for years 1 and 2 are provided in Table 4 and include review of initial and supplemental reports, variance applications, and supplemental data requests. The Agency burden for year 3 and burden average for the first 3 years are provided in Table 5 and include review of initial and supplemental reports and variance applications, development of a database and standard forms for submission of triennial reports, populating the database with information obtained from triennial reports, and QA/review of triennial report data. A list of Agency activities is provided in Tables 4 and 5.

(b) Collection Methodology and Management.

Reports submitted to the agency and records maintained by the regulated entities may be tabulated and published for use in compliance and enforcement programs.

(c) Small Entity Flexibility.

The 1EPA included a small quantity manufacturer exemption in the final rule (See 73 FR 15603). This exemption is targeted to particularly small entities that would otherwise bear particularly high costs for compliance relative to the small amount of products they produce and, therefore, the small amount of total VOC emissions from such products. In addition, there are provisions that allow facilities additional time to develop compliant products if they have not previously developed products to meet the limits of the California Air Resource Board aerosol coating rule, which contains identical limits to the EPA's final rule. The EPA maintains that the majority of facilities that would qualify for this extended compliance time would likely be small entities. Finally, companies subject to the rule can apply for variances in cases where the company, because of extraordinary reasons beyond reasonable control, cannot comply with the rule. While all variance applications will receive close scrutiny, the EPA will give full consideration to the special needs of small manufacturers and importers.

(d) Collection Schedule.

The specific frequency for each information collection activity within this request is shown in Table 2, column B.

5. Estimating the Burden and Cost of the Collection

Tables 2 through 5 document the individual burden items for the recordkeeping requirements resulting from the ICR. The individual burdens are expressed under standardized headings 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. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

(a) Estimating Respondent Burden.

1The average annual burden estimates for reporting, recordkeeping, and labeling requirements are presented in Tables 2 and 3 for all manufacturers. These numbers were derived from estimates based on the EPA's experience with other standards and from information obtained from the industry representatives listed under "Consultations". Because this is a renewal of an existing ICR that is scheduled to expire on October 31, 2018, these estimates represent the average annual burden that will be incurred by the affected industry in the 3-year period after approval of this renewal. The hours shown in column A of Table 2 are the burden estimate per manufacturer.

(b) Estimating Respondent Costs.

(i) Estimating labor costs.

This ICR uses the following labor rates:

Civilian Labor Category	Occupational Code	BLS Mean Wage Estimate, in 2016\$^a	Loaded Wage (+110%), in 2016\$
Managerial	11-1021	\$58.70	\$123.27
Technical	51-8090	\$30.65	\$64.37
Clerical	43-6010	\$19.39	\$40.72

^a https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

These rates are from the United States Department of Labor, Bureau of Labor Statistics survey titled “May 2016 National Occupational Employment and Wage Estimates United States.” The rates are from column 8, “Mean hourly wage.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

1 Labor rates and associated costs are based on the hourly rates estimated above in paragraph 6(b) as follows: \$40.72 for clerical personnel, \$64.37 for technical personnel and \$123.27 for management personnel. For the estimated industry burden, the number of clerical hours is assumed to equal 10 percent of the number of technical hours (see Table 2).

(ii) Estimating capital/startup and operation and maintenance costs. No capital/startup and operation and maintenance costs are associated with this rulemaking.

(iii) Capital/startup v. operation and maintenance (O&M) costs. No capital/startup and operation and maintenance costs are associated with this rulemaking.

(c) Estimating Agency Burden and Cost

Because the information collection requirements were estimated as an incidental part of the standard development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of respondents are required under section 183(e) of the CAA, no operational costs will be incurred by the Federal government. Examination of records to be maintained by the respondents will occur incidentally as a part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program and is not attributable to this ICR. The only costs that the Federal government will incur are costs associated with the review of reported information, as presented in Tables 4 and 5.

Agency Worker Rates	Labor Rates, \$/hr^a	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$40.50	\$24.30	\$64.80
Technical (GS-12, step 1)	\$30.05	\$18.03	\$48.08
Clerical (GS-6, step 3)	\$16.26	\$9.76	\$26.02

^a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf.

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. For the estimated government burden, the number of management hours is assumed to equal 5 percent of the number of technical hours and the number of clerical hours is assumed to equal 10 percent of the number of technical hours (see Table 4). Details upon which this estimate is based appear below in Tables 4 and 5.

(d) Estimating the Respondent Universe and Total Burden Costs

The following assumptions were used to determine the respondent universe and total burden and costs for industry to comply with the various requirements of the rule:

- The total number of regulated entities in Year 1 will be 63;
- Assumes 10 percent of respondents will request a variance;
- Assumes each respondent will have one incident per year that will require supplemental reporting (also referred to as a “notice of change” report);
- Total number of respondents in Year 2 will be 64 and in Year 3 will be 65;
- Same 10 percent requesting a variance;
- Assumes each respondent will have one incident per year that will require supplemental reporting;
- Assumes each respondent will maintain records on 37 formulations (average for industry);
- Assumes nine respondents per year will be required to respond to enforcement questions or other agency requests for information; and
- Assumes each respondent will submit a triennial report of formulations and VOC usage.

(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent tally. Year 1 and 2 burden estimates include an initial number of respondents that will be required to perform recordkeeping and reporting activities, and assumes one additional initial and supplemental reports will be required to be completed due to new aerosol coating product formulations being introduced into the market, or changes in existing aerosol coatings formulations. Beginning in Year 3, triennial reports will be submitted, increasing the burden for those years where a report is due.

The bottom line respondent burden hours and cost for years 1 and 2, presented in Table 2, are calculated by summing all total costs for the reporting activities and the total costs for the recordkeeping activities. The annual burden and costs are 9,480 hours and \$624,368.

The bottom line respondent burden hours and cost for Year 3, presented in Table 3, are calculated by summing all total costs for the reporting activities and the total costs for the recordkeeping activities. The annual burden and costs for year 3 are 17,818 hours and \$1,316,604. Thus, the annual average burden equals the sum of the burden hours in Years 1 (9,480), 2 (9,480) and 3 (17,818), divided by 3, or 12,259 and the cost of years 1 and 2 (\$624,368 each year) and year 3 (\$1,316,604) divided by 3, or \$855,113.

(ii) Agency tally. The bottom line Agency burden and costs are presented in Tables 4 and 5. The average annual cost to the Federal government is \$54,537 (\$32,392 year 1, \$32,392 year 2, \$98,827 year 3).

(iii) Variations to the annual bottom line. The EPA anticipates that the annual burden after Year 3 will be equal to the burden in Year 2 for 2 of every 3 years and equal to Year 3 for 1 of every 3 years.

(f) Reasons for Change in Burden.

Annual average respondent burden is estimated in this renewal to be 12,259 hours. This is a very slight decrease from the estimate in the previous ICR of 12,265 hours. Estimated respondent costs have also decreased from \$1,033,626 to \$855,113. Estimated Agency annual average burden remains the same as 1,121 hours and the annual average costs decreased from \$81,795 to \$54,537. The change in costs were observed due to updated labor rates used in this ICR renewal for calculating both industry, and government burden costs. Incremental calculation errors were also found and fixed for this renewal.

1 (g) Burden Statement

1The annual public reporting and recordkeeping burden for this collection of information is estimated to average 166 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 currently valid OMB control number. The OMB control numbers for the EPA's regulations are listed in 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2006-0971, which is available for online viewing at <https://www.regulations.gov>, or in person viewing at the Air Docket in the EPA Docket Center (EPA/DC), EPA WJC West Building, Room 3334, 1301 Constitution Avenue, 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at <https://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. 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 the EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2006-0971.

Table 2. Industry Recordkeeping & Reporting Costs

Burden Item	(A)	NOTES	(B)	NOTES	(C)	Dollars per Hour	(D)	(E)	NOTES	(F)	Total
	Person Hours per Occurrence		Number of Occurrences per Respondent per Year		Person Hours per Respondent per Year		Person Hours/Respondent (clerical) (D=.1 x tech hours)	Respondents per Year		Total Hours per Year	
					(C=AxB)					(F=(C+D)xE)	Cost in Year 1 (\$)
Reporting											
Read instructions			1		4	123.27		1	a	4	493.08
Gather information	4		1		4	64.37	0.4	1	a	4.4	273.77
Initial report (incl. small quantity manufacturers)	25.25		1		25.25	64.37	2.525	1	b	27.775	1,728
Supplemental report	4		1		4	64.37	0.4	63.5		279.4	17,384
Variance or compliance extension application	24		1		24	123.27		0.1	a	2.4	295.85
Responding to the EPA request for data	60		1		60	123.27		9		540	66,566
Recordkeeping											
Read instructions	(above)										
Plan activities	16		1		16	123.27		1	a	16	1,972
Calculation of reactivity	0.5	c	37	d	18.5	64.37	1.85	11	b	224	13,928
Maintenance of batch information	0.25	e	481		120	64.37	12	63.5	f	8382	521,528
Total Industry Burden- complying with rule										9480	\$624,169
Additional Burden- variance											\$199
TOTAL INDUSTRY BURDEN- Year 1 and 2 each										9480	\$624,368

NOTES:

Average for first year of existing manufacturer

149

a- Assumes up to 1 new aerosol coating manufacturers each year. Same 10% requesting variance

b- Assumes 10 manufacturers add new coating category each year

c- Same average time for calculating formulations for new category.

d- Uses average of all existing manufacturers. Likely to be an overestimate for both new manufacturers and for existing manufacturers adding a new coating category

e- Same estimate as Year 1 for existing manufacturers.

f- 60 existing manufacturers plus 1 new

Average in Year 2 for new manufacturer (same as Year 1 for existing)

149

Average cost per respondent

149

\$9,833

Table 3. Respondent Cost in Year 3 and Average for First 3 Years

	(A)		(B)		(C)		(D)	(E)		(F)	
Burden Item	Person Hours per Occurrence	NOTES	Number of Occurrences per Respondent per Year	NOTES	Person Hours per Respondent per Year (C=AxB)	Dollars per Hour	Person Hours/Respondent (clerical) (D=.1 x tech hours)	Respondents per Year	NOTE S	Total Hours per Year (E=(C+D) x F)	Total Cost in Year 1 (\$)
Reporting											
Read instructions	4		1		4	123.27		1	a	4.0	412
Gather information	4		1		4	64.37	.4	1	a	4.4	274
Initial report (incl. small quantity manufacturers)	25.25		1		25.25	64.37	2.525	1	b	27.8	1728
Supplemental report	4		1		4	64.37	.4	65		286.0	17793
Variance or compliance extension application	24		1		24	123.27		0.1	a	2.4	296
Responding to the EPA request for data	60		1		60	123.27		9		540.0	66566
For triennial report											
Establish account for NEI	2		1		2	64.37	.2	65		143.0	8897
Enter general information into database	0.5		1		0.5	64.37	.05	65		35.8	2224
Enter product formulations into database	0.25		37		9.25	64.37	.925	65		661.4	41151
Enter company-wide volumes of coating constituents into database	2		1		2	64.37	.2	65		143.0	8897
Recordkeeping											
Read instructions											
Plan activities	16		1		16	123.27		1	a	16	1972
Calculation of reactivity	0.5	c	37	d	18.5	64.37	1.85	11	b	223.85	13928
Maintenance of batch information	0.25	e	481		120	64.37	12	65	f	8580	533848
For triennial report											

Calculate company-wide volume usage of coating constituents	56	g	1	56	64.37	5.6	65	f	4004	249129
QA/QC and review	40	h	1	40	123.27		65	f	2600	320502
Read instructions/take training for reporting- support	4		1	4	64.37	.4	65	f	286	16737
Read instructions/take training for reporting- management	4		1	4	123.27		65	f	260	32050
Total Industry Burden- complying with rule									17,818	\$1,316,405
Additional Burden- variance										\$199
TOTAL INDUSTRY BURDEN- Year 3									17,818	1,316,604

NOTES:

- a- Assumes up to 2 new aerosol coating manufacturers in first 2 years (added both in Year 2). Same 10% requesting variance
- b- Assumes 10 manufacturers add new coating category each year
- c- Same average time for calculating formulations for new category.
- d- Uses average of all existing manufacturers. Likely to be an overestimate for both new manufacturers and for existing manufacturers adding a new coating category
- e- Same estimate as Year 1 for existing manufacturers.
- f- 60 existing manufacturers plus 1 new
- g- Assumes 2 days to gather information and 2.0 hours to sum all information for each constituent- assumes an average of 20 different constituents used by facility
- h- Assumes review of all information by senior official of company

Average cost per respondent		274	\$20,255
Average cost for triennial report per respondent		125	\$10,455
			Total Year Costs
Average Cost for Year 1	149	9480	\$624,368
Average Cost for Year 2	149	9480	\$624,368
Average Cost for Year 3	274	17818	\$1,316,405
Average of first 3 years	191	12259	\$855,113

Table 4. Government Recordkeeping & Reporting Costs Years 1 and 2 ^a

	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Burden Item	Person Hours per Occurrence	Number of Occurrences per Respondent per Year	Person Hours per Year @ \$48.04 (Technical) (C=AxB)	Person Hours per Year @ \$64.80 (Management) (D = C x 0.05)	Person Hours per Year @ \$26.02 (Clerical) (E = C x 0.01)	Total Person Hours per Year (F=C+D+E)	Total Cost Per Year (\$)
Initial report	8	1	8	0.4	0.08	8.48	413
Supplemental report	4	61	244	12.2	2.44	258.64	12,586
Variance application	16	1	16	0.8	0.16	16.96	825
Supplemental data request	40	9	360	18	3.6	381.6	18,569
Total Government Burden		72	628	31.4	6.28	665.68	\$ 32,392

^a This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit package available to government employees: \$64.80 Managerial rate (GS-13, Step 5, \$40.50 + 60%), \$48.08 Technical rate (GS-12, Step 1, \$30.05+ 60%), and \$26.02 Clerical rate (GS-6, Step 3, \$16.26 + 60). These rates are from the Office of Personnel Management (OPM) 2017 General Schedule which excludes locality rates of pay.

Table 5. Government Burden- Year 3- and Average for First 3 Years^a

Burden Item	(A) Person Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person Hours per Year @ \$48.08 (Technical) (C=AxB)	(D) Person Hours per Year @ \$64.80 (Management) (D = C x 0.05)	Person Hours per Year @ \$26.02 (Clerical) (E = C x 0.01)	(E) Total Person Hours per Year (F=C+D+E)	Total Cost Per Year (\$)
Initial report	8	1	8	0.4	0.08	8	413
Supplemental report	4	62	248	12.4	2.48	263	12,792
Variance application	16	1	16	0.8	0.16	17	825
Develop Database and Report Forms for Triennial Report	300	1	300	15	3	318	15,474
Populate Database for triennial report	12	62	744	37.2	7.44	789	38,376
QA/Review data for triennial report	600	1	600	30	6	636	30,948
Total Government Burden		128	1916	95.8	19.16	2031	\$ 98,827

^a This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit package available to government employees: \$64.80 Managerial rate (GS-13, Step 5, \$40.50 + 60%), \$48.08 Technical rate (GS-12, Step 1, \$30.05+ 60%), and \$26.02 Clerical rate (GS-6, Step 3, \$16.26 + 60). These rates are from the Office of Personnel Management (OPM) 2017 General Schedule which excludes locality rates of pay.

Year 1	665.68	\$ 32,392
Year 2	665.68	\$ 32,392
Year 3	2,031	\$ 98,827
Average of 3 years	1121	\$ 54,537