

Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operatio

Burden item	(A)	(B)	(C)	(D)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year
1. Applications	N/A			
2. Surveys and Studies	N/A			
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A			
4. Reporting Requirements				
A. Familiarization with Regulatory Requirements ^b	1	1	1	2,900
B. Required activities				
Initial Notification of applicability ^c	2	1	2	0
Notification of Compliance Status ^d	4	1	4	0
Annual Compliance Certification ^e	2	1	2	2,900
Annual Report of Deviations ^f	2	1	2	145
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
Reporting Subtotal				
5. Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities	See 5E			
C. Implement activities	See 5E			
D. Develop record system	See 5E			
E. Time to enter information	N/A			
Records of all information required by standards ^g	0.33	52	17.16	2,900
F. Time to train personnel	N/A			
G. Time to adjust existing ways to comply with previously applicable requirements	N/A			
H. Time to transmit or disclose information ^h	0.25	1	0.25	290
I. Time for audits	N/A			
Recordkeeping Subtotal				
TOTAL LABOR BURDEN AND COST (rounded)ⁱ				
TOTAL CAPITAL AND O&M COST (rounded)ⁱ				
GRAND TOTAL (rounded)ⁱ				

Assumptions

^a This ICR uses the following labor rates: \$149.35 for managerial labor, \$112.98 for technical labor, and \$54.81 for clerical labor. Statistics, June 2017 “Table 2. Civilian Workers, by occupational and industry group.” The rates have been increased by 110 percent industry.

^b There are an estimated 2,900 existing plating and polishing plants and no new facilities are expected. We assume that each source

^c Each of the 2,900 existing plants noted above would have already submitted an initial notification. Since there are no new facilities

^d Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate respondents required to submit a notification of compliance status is 0.

^e The 2,900 existing plants would be required to prepare an annual compliance certification every year. They would only submit the experience a deviation, the number of compliance certifications submitted will be $(2,900 * 0.05) = 145$.

^f Assumes that 5% of existing facilities would have to submit a report of deviations starting in Year 3 of the ICR clearance period,

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

^h Annual transmittals would include submission of annual compliance certifications (145) and reports of deviations (145) for 5% of

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

ns (40 CFR Part 63, Subpart WWWW) (Renewal)

112.98 (E)	149.35 (F)	54.81 (G)	(H)
Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year ^a
2,900	145	290	\$365,192.65
0	0	0	\$0
0	0	0	\$0
5,800	290	580	\$730,385.30
290	14.5	29	\$36,519.27
10,339			\$1,132,097
49,764	2,488.2	4,976.4	\$6,266,705.87
72.5	3.63	7.25	\$9,129.82
57,312			\$6,275,835.69
67,700			\$7,410,000
			\$0
			\$7,410,000

22 hours per response

These rates are from the United States Department of Labor, Bureau of Labor
to account for the benefit packages available to those employed by private

subject to the standard will have to familiarize with the regulatory requirements each year.
es expected, the number of respondents required to submit an initial notification is 0.

e compliance date. Since there are no new facilities expected, the number of

e certifications if a deviation occurred; assuming that 5 percent of the plants

or $(2,900 * 0.05) = 145$.

f one-third of 2,900 facilities, so $(2,900 * 0.05) * 2 = 145 * 2 = 290$ respondent.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Plating and Polishing Operatio

Activity	(A)	(B)	(C)	(D)
	EPA Person-hours per occurrence	No. of occurrences per respondent per year	EPA Person-hours per plant per year (A) x (B)	Plants per year
Report Review:				
Initial Notification of applicability ^b	1	1	1	0
Notification of Compliance Status ^c	2	1	2	0
Annual Compliance Certification ^d	2	1	2	145
Annual Report of Deviations ^e	2	1	2	145
TOTAL ANNUAL BURDEN AND COST (rounded)^f				

Assumptions

^a This ICR uses the following average hourly labor rates: \$64.80 for managerial (GS-13, Step 5, \$39.31 +60%), \$48.08 (GS-12, Step 5, \$30.05 +60%). These rates are from the Office of Personnel Management (OPM) 2017 General Schedule, which excludes locality rates of pay. These rates are available to government employees.

^b Assumes no new plants in the next three years.

^c Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate respondents required to submit a notification of compliance status is 0.

^d The 2,900 existing plants would be required to prepare an annual compliance certification; any plant that experiences a deviation will experience a deviation during the three year ICR period, the number of submittals would be $(2,900 * 0.05) = 145$.

^e Assumes that 5% of existing facilities would have to submit a report of deviations in the three year ICR period, or $(2,900 * 0.05) = 145$.

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

ns (40 CFR Part 63, Subpart WWWW) (Renewal)

48.08 (E)	64.8 (F)	26.02 (G)	(H)
Technical person-hours (C) x (D)	Managerial person-hours (E) x 0.05	Clerical person- hours (E) x 0.10	Cost, \$
0	0	0	\$0
0	0	0	\$0
290	14.5	29	\$15,637.38
290	14.5	29	\$15,637.38
667			\$31,300

1, \$29.17 + 60%) for technical and \$26.02 (GS-6, Step 3, \$15.78 + 60) for clerical. e rates have been increased by 60 percent to account for the benefit packages

ompliance date. Since there are no new facilities expected, the number of

ill have to submit the compliance certification; assuming 5 percent of the plants

145.