

Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40

Burden Item	Person-Hours per occurrence (A)	Number of occurrences per year (B)	Person-Hours per respondent per year (C=AxB) (C)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with regulatory requirements	1	1	1
B. Required Activities			
Initial Performance Tests	60	1	60
Repeat Performance Tests ^c	60	0.2	12
C. Gather Existing Information	See 3b		
D. Write Report			
Notification of Construction or Reconstruction	2	1	2
Notification of Initial Performance Test	2	1	2
Notification of Actual Startup	2	1	2
Report of Performance Test	See 3b		
Semiannual Report ^d	8	2	16
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report ^e	16	2	32
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarization with regulatory requirements	See 3b		
B. Plan activities	See 3b		
C. Implement activities			
Monthly Performance Test ^f	1	12	12
D. Develop record system	N/A		
Records of Operating Parameter ^g	0.25	350	87.5
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^h			
TOTAL CAPITAL AND O&M COST (rounded) ^h			
GRAND TOTAL (rounded) ^h			

^a We have assumed that there are approximately 400 respondents, with no additional new or reconstructed sources.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table B-1. Compensation of Employees by Industry, Sex, Race, and Hispanic or Latino Ethnicity." The rates are from "column 1, Total Compensation." The rates have been increased by 110% to account for the benefit package.

^c We have assumed that tests will fail 20% of the time. -

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

^e We have assumed that 20 percent of respondents will experience twice a year both a monitoring exceedance under 40 CFR 60.312. We assume that it will take 16 hours to complete these reports, assuming it takes 8 hours to complete each monitoring systems performance report in 40 CFR 60.315(c).

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

^g We have assumed that each respondent will take 0.25 hours per day over 350 days per year to keep record of operations.

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

CFR Part 60, Subpart EE) (Renewal)

Respondents per Year ^a (D)	Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs per Year ^b (H)
400	400	20	40	\$52,394.58
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
400	6400	320	640	\$838,313.28
80	2560	128	256	\$335,325.31
		10,764		\$1,226,033
400	4800	240	480	\$628,734.96
400	35000	1750	3500	\$4,584,525.75
		45,770		\$5,213,261
		56,500		\$6,440,000
				\$840,000
				\$7,280,000

Managerial (per hour)	Technical (per hour)	Clerical (per hour)
\$147.40	\$117.92	\$57.02

Hours Per Response
59 hr/resp

es becoming subject to the rule over the next three years.

\$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical
e 2. Civilian Workers, by Occupational and Industry group.” The rates
ackages available to those employed by private industry.

der 40 CFR 60.315(c) and an exceedance of the standard in 40 CFR
ch excess emissions report in 40 CFR 60.315(b) and 8 hours to complete

erating parameters.

Respondant Rates

(Source: United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group.")

Labor Type	Total Compensation (\$/hr)	Loaded Rate (Rate + 110%rate)
Mgmt.	\$70.19	\$147.40
Tech.	\$56.15	\$117.92
Cler.	\$27.15	\$57.02

Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture Coating (40 C)

Activity	EPA Hours per Occurrence (A)	Number of occurrences per year (B)	EPA Person Hours per Year (C=AxB) (C)	Respondents per Year (D) ^a
Required activities				
Initial performance test	24	1	24	0
Repeat performance test ^c	24	0.2	4.8	0
Report review				
Notification of Construction	2	1	2	0
Notification of Initial Startup	0.5	1	0.5	0
Notification of Actual Startup	0.5	1	0.5	0
Notification of Initial Performance Test	0.5	1.2	0.6	0
Performance Test Results	8	1.2	9.6	0
Semiannual Reports ^d	2	2	4	400
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report ^e	2	2	4	80
TOTAL ANNUAL BURDEN AND COST (rounded)^f				

^a We have assumed that there are approximately 400 respondents, with no additional new or reconstructed sources be years.

^b This cost is based on the following labor rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). The rates have been increased by 60 percent to account for the employees. These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes

^c We have assumed that tests will fail 20% of the time. -

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

^e We have assumed that EPA will take two hours to review both reports: one hour to review each excess emissions and monitoring systems performance report. We also assumed that 20 percent of existing plants will submit twice per year an excess emissions and monitoring systems performance report.

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

FR Part 60, Subpart EE) (Renewal)

Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs (\$/year) ^b (H)
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
1600	80	160	\$87,481.60
320	16	32	\$17,496.32
2,210			\$105,000

Managerial (per hour)	Technical (per hour)	Clerical (per hour)	Agency Rates Source: Office of Personr
\$65.71	\$48.75	\$26.38	
			(GS- 12, step 1) - Tech.
			(GS- 13, step 5) - Mgmt.
			(GS-6, step 3) - Cler.

coming subject to the rule over the next three

l rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and benefit packages available to government es locality rates of pay.

eport and one hour to review each monitoring emissions reports and a monitoring systems

iel Management (OPM), 2017 General Schedule

Hourly Mean Wage	With Fringe & Overhead
30.47	\$48.75
41.07	\$65.71
16.49	\$26.38

Capital/Startup vs. Operation and Maintenance (O&M) Costs

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E x F)
Temperature	4,400	0	\$0	\$2,100	400	\$840,000

Total Annual Responses

(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Notification of construction/reconstruction	0	1	0
Notification of initial performance test	0	1.2	0
Notification of actual startup	0	1	0
Initial performance test report	0	1.2	0
Semiannual report	400	2	0
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report	80	2	0
			Total

(E)
Total Annual Responses E=(BxC)+D
0
0
0
0
800
160
960