

Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Large Appliances (Domestic)

BURDEN ITEM	Person-Hours per occurrence (A)	Number of occurrences per year (B)	Person-Hours per respondent per year (C=AxB) (C)	Respondents per Year ^a (D)
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements	1	1	1	72
B. Required Activities				
Initial Performance Tests	60	1	60	0
Repeat Performance Tests	60	0.2	12	0
C. Gather Existing Information	See 3b			
D. Write Report				
Notification of Construction/ Reconstruction	2	1	2	0
Notification of Initial Performance Test	2	1	2	0
Notification of Actual Startup	2	1	2	0
Report of Performance Test	See 3b			
Semiannual Report ^c	5	2	10	72
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report ^d	4	2	8	15
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 ^e	1	12	12	72
D. Develop record system	N/A			
Records of Operating Parameter ^f	0.25	250	62.5	72
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^g				
TOTAL CAPITAL AND O&M COST (rounded)^g				
GRAND TOTAL (rounded)^g				

Assumptions:

^a We have assumed that there are approximately 72 existing sources currently subject to this rule, with no additional three-year period of this ICR.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June and Industry group.” The rates are from “column 1, Total Compensation.” The rates have been increased by 110% to employed by private industry.

^c We have assumed that each respondent will take 5 hours twice per year to complete the semiannual report.

^d We have assumed that 15 respondents will take 4 hours twice per year to write the excess emission report and temperature limit exceedance reports. 20 percent of respondents ($0.20 \times 72 = 14.4$ facilities) will exceed the emission standard in 40 CFR 60.452 at least once in a year. These facilities are required to write the quarterly excess emission report in 40 CFR 60.455(b) twice per year. We have assumed that 5% of these facilities are incineration, and that 20% of these 4 respondents with incineration ($0.20 \times 4 = 0.8$) will exceed their temperature limit and are required to prepare semiannual monitoring exceedance reports twice per year under 40 CFR 60.455(c). (14.4 respondents)

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

^f We have assumed that each respondent will take 0.25 hours 250 times per year to record operating parameter.

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

nces (40 CFR Part 60, Subpart SS)

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)
72	3.6	7.2	\$9,431.02
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
720	36	72	\$94,310.24
120	6	12	\$15,718.37
1,049			\$119,460
864	43.2	86.4	\$113,172.29
4500	225	450	\$589,439.03
6,169			\$702,611
7,220			\$822,000
			\$8,400
			\$830,000

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

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

Labor Type	Compensation
Mgmt.	\$70.19
Tech.	\$56.15
Cler.	\$27.15

new sources becoming subject to the rule over the

7.92 per hour for Technical labor, and \$57.02 per hour for Managerial labor. In 2018, "Table 2. Civilian Workers, by Occupational Group," account for the benefit packages available to those

erature variance report. We have assumed that 20
each of two quarterly reporting periods, so will be
of respondents (i.e., $0.05 \times 72 = 4$ facilities) use
luring both 6-month periods of each year, so will be
ents + 0.8 respondents = 15 respondents)

Clerical (per hour)
\$57.02

For Statistics, June 2018,
 (round up.)

Loaded Rate (Rate + 110%rate)
\$147.40
\$117.92
\$57.02

Table 2: Average Annual EPA Burden and Cost – NSPS for Surface Coating of Large Appliance

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 (D)	Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=E \times 0.05) (F)
Required activities						
Initial performance test	24	1	24	0	0	0
Repeat performance test	24	0.2	4.8	0	0	0
Report review						
Notification of Construction/ Reconstruction	2	1	2	0	0	0
Notification of Actual Startup	0.5	1	0.5	0	0	0
Notification of Initial Performance Test	0.5	1	0.5	0	0	0
Performance Test Results	8	1.2	9.6	0	0	0
Semiannual Reports ^c	2	2	4	72	288	14.4
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report ^e	2	2	4	15	60	3
TOTAL ANNUAL BURDEN AND COST (rounded)^e						400

Assumptions:

^a We have assumed that there are approximately 72 existing sources currently subject to this rule. There will be no additions become subject to the rule over the three-year period of this ICR.

^b This cost is based on the following labor rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). The rates have been increased by 60 percent to a packages available to government employees. These rates are from the Office of Personnel Management (OPM), 2018 General Schedule (GS) rates of pay. These rates exclude locality rates of pay.

^c We have assumed that EPA will take two hours twice per year to review semiannual reports.

^d We have assumed that EPA will take 2 hours twice per year to review quarterly excess emissions and semiannual monitoring reports. We have assumed that 20 percent of respondents (0.20*72=14.4 facilities) will exceed the emission standard in 40 month reporting period and be required to write the excess emission report in 40 CFR 60.455(b) twice per year. We have assumed that 0.05*72=3.6 facilities use incineration, and that 20% of these 4 respondents with incineration (0.20*4=0.8) will exceed the temperature limit during both 6-month periods of each year and be required to prepare semiannual monitoring exceedance reports in 40 CFR 60.455(c). (14.4 respondents + 0.8 respondents =15 respondents)

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

Positions (40 CFR Part 60, Subpart SS) (Renewal)

Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs (\$/year) ^b (H)
0	\$0.00
0	\$0.00
0	\$0.00
0	\$0.00
0	\$0.00
0	\$0.00
28.8	\$15,746.69
6	\$3,280.56
	\$19,000

Managerial (per hour)	Technical (per hour)	Clerical (per hour)
\$65.71	\$48.75	\$26.38

Source: Office of Personnel Management (OPM), 2018 General Schedule

	Mean	Fringe &
(GS- 12, step 1) - Tech.	30.47	\$48.75
(GS- 13, step 5) - Mgmt.	41.07	\$65.71
(GS-6, step 3) - Cler.	16.49	\$26.38

Additional new sources that will

of \$48.75 (GS-12, Step 1, account for the benefit General Schedule, which

bring systems performance CFR 60.452 once per 6- assumed that 5% of) will exceed their report twice per year under 40

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 ^a	(G) Total O&M (E x F)
Temperature	8,000	0	\$0	\$2,100	4	\$8,400

^a We are assuming that only 5% of facilities use incineration.

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 performance test	0	1	0
Notification of actual startup	0	1	0
Report of performance test	0	1.2	0
Semiannual report	72	2	0
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report	15	2	0
			Total

Total Respondent Hours: 7,217

Hours Per Response: 41

(E)
Total Annual Responses $E=(B \times C)+D$
0
0
0
0
144
30
174