

**Table 1: Annual Respondent Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing (Renewal)**

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)
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. Familiarize with regulatory requirements <sup>d</sup>	0.5	1	0.5
B. Required activities			
Initial notification <sup>c</sup>	2	1	2
Notification of compliance status <sup>c,e</sup>	4	1	4
Annual compliance certification <sup>f</sup>	2	1	2
Report of exceedences <sup>g</sup>	2	1	2
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
<b>Subtotal for Reporting Requirements</b>			
5. Recordkeeping Requirements			
A. Familiarize 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			
Records of all information required by standards <sup>h</sup>	0.25	12	3
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 <sup>i</sup>	0.25	1	0.25
I. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirement</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>j</sup></b>			
<b>TOTAL CAPITAL &amp; O&amp;M COST (rounded)<sup>j</sup></b>			
<b>GRAND TOTAL (rounded)<sup>j</sup></b>			

**Assumptions:**

- <sup>a</sup> There are an estimated 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected.
- <sup>b</sup> This ICR uses the following labor rates: \$147.40 for managerial labor, \$117.92 for technical labor, and \$57.02 for clerical labor. These rates are based on the 2014 Bureau of Economic Analysis (BEA) Survey of Professional and Management Occupations (SPMO) and the 2014 BEA Survey of Occupational Employment Statistics (SOES).
- <sup>c</sup> One-time notification.
- <sup>d</sup> We have assumed that each respondent will each take 0.5 hours to familiarize with regulatory requirements.
- <sup>e</sup> We have assumed that each respondent will take four hours to complete the notification of compliance status task.
- <sup>f</sup> We have assumed that each respondent will take two hours once per year to complete the task.

<sup>g</sup> Percentage of respondents with exceedances is assumed to be 5%.

<sup>h</sup> We have assumed that each respondent will take 0.25 hours once per month to record information that are required by the standards.

<sup>i</sup> We have assumed that each respondent will take 0.25 hours once per year to transmit or disclose information.

<sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



ional and industry group.” The rates have been increased by 110 percent to account for the benefit packages available to those emplo;

yed by private industry.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Nine Metal Fabrication and CFR Part 63, Subpart XXXXXX) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)
	Person-hours per occurrence	NO. OF occurrences per respondent per year	Person-hours per respondent (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours (E=CxD)
Report Review:					
Initial Notification <sup>c</sup>	1	1	1	0	0
Notification of compliance status <sup>c</sup>	2	1	2	0	0
Annual Certification/ Compliance Report <sup>d</sup>	2	1	2	5,800	11,600
Report of exceedance <sup>d,e</sup>	2	1	2	290	580
<b>TOTAL (rounded)<sup>f</sup></b>					

**Assumptions:**

- <sup>a</sup> There are an estimated 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected
- <sup>b</sup> This ICR uses the following average hourly labor rates: For managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%), \$48.75 (GS-12, \$30.50 + 60%)
- <sup>c</sup> One-time notification.
- <sup>d</sup> We have assumed two hours once per year to review reports.
- <sup>e</sup> Percentage of respondents with exceedances is assumed to be 5%.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Finishing Area Sources (40)**

(F)	(G)	(H)
Managerial person-hours (Ex0.05)	Clerical person-hours (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	\$0
0	0	\$0
580	1,160	\$634,212.60
29	58	\$31,710.63
14,000		\$666,000

Step 1, \$30.47 x 1.6) for technical, and \$26.38 (GS-6, Step 3, \$16.49 x 1.6) for clerical. These rates are from the Office of Personnel M.

anagement (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to acco



ount for the benefit packages available to government employees.