

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION**

National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal

ATTACHMENT 1

TABLES 1, 2, 3, and 4

Annual Respondent Burden and Cost of Recordkeeping and Reporting R

Summary of Annual Respondent Burden and Cost of Recordkeeping and

ATTACHMENT 2

TABLES 5, 6, 7, and 8

Annual Agency Burden and Cost of Recordkeeping and Reporting Requi

Summary of Annual Agency Burden and Cost of Recordkeeping and Rej

F
AGENCY

Furniture (40 CFR Part 63, Subpart RRRR) (Amendments)

Requirements for the Surface Coating of Metal Furniture NESHAP – Years 1-3 (Amendments)

Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

Requirements for the Surface Coating of Metal Furniture NESHAP - Year 1-3 (Amendments)

Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

Respondent Wages (\$2016)		
Category (1)	Hourly Mean Wage (2)	Loaded Wage (3)
Technical	\$43.02	\$90.34
Clerical	\$17.96	\$37.72
Managerial	\$52.87	\$111.03
Footnotes:		
<p>(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 337000 - Furniture and Related Product Manufacturing," found here: https://www.bls.gov/oes/current/naics3_337000.htm</p> <p>(2) Selected "mean hourly wage" in the table referenced in footnote 1.</p> <p>(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.</p>		

EPA Wages (\$2016)		
Category (1)	Hourly Mean Wage	Wage With Fringe & Overhead (2)
(GS- 12, step 1) - Technical	\$30.05	\$48.08
(GS- 13, step 5) - Managerial	\$40.50	\$64.80
(GS-6, step 3) - Clerical	\$16.26	\$26.02
Footnotes:		
<p>(1) The hourly mean wage for each category is found here: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salar</p> <p>(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.</p>		

Table 1: Annual Respondent Burden and Cost – NESHAP for Surface Coating of Metal Furniture (40 C

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=AxB)	(D) Respondents per year
1. Reporting requirements				
a. Familiarize with rule requirements	4	1	4	583
b. Process/review information	4	4	16	583
c. Write reports				
i. Initial notification	2	1	2	0
ii. Notification of compliance status	2	1	2	0
iii. Notification of construction/reconstruction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of performance test	2	1.2	2.4	0
vi. Report of performance test	10	1.2	12	0
vii. Semiannual report	6	2	12	583
viii. Excess emissions report	4	0.5	2	583
ix. Startup, shutdown, malfunction report	4	0.5	2	583
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarize with rule requirements	4	1	4	583
b. Plan activities	12	1	12	583
c. Implement activities	12	1	12	583
d. Maintain record system for material used	20	1	20	583
e. Time to enter information				
i. Material usage	0.5	260	130	583
ii. Compliance calculation	2	12	24	583
f. Time to train personnel	10	1	10	583
g. Store, file, and maintain records	2	12	24	583
h. Retrieve records/reports	1	12	12	583
Subtotal for Recordkeeping Requirements				
TOTAL ANNUAL BURDEN AND COSTS (rounded):[§]				
Capital and O&M Cost (see Section 6(b)(iii)):[§]				
TOTAL COST:[§]				

Assumptions:

^a We have assumed that there are approximately 583 respondents, with no additional new or reconstructed sou

^b This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labo labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2016 Nati Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1, "Tota

for the benefit packages available to those employed by private industry.

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

^d We have assumed that each respondent will take four hours twice per year to complete the excess emissions report.

^e We have assumed that each respondent will take 0.5 hours 260 times per year to enter information.

^f We have assumed that each respondent will have to complete task once per month.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Surface Coating of Metal Furniture (40 CFR 403.10)

Burden Item	(A) Person-hours per activity	(B) Number of activities per year	(C) Technical person-hours per year (C=AxB)	(D) Management person-hours per year (D=Cx0.05)
1. Initial performance test	24	0	0	0
2. Repeat performance test	24	0	0	0
3. Report review				
a) Initial notification	8	0	0	0
b) Notification of performance test	8	0	0	0
c) Notification of compliance status	8	0	0	0
d) Notification of construction/reconstruction	8	0	0	0
e) Notification of actual startup	8	0	0	0
f) Notification of performance test	8	0	0	0
g) Report of performance test	8	0	0	0
h) Semiannual report	12	1,166	13,992	699.6
i) Excess emissions report	8	291.5	2,332	116.6
j) Startup, shutdown, malfunction report	8	291.5	2,332	116.6
Total Burden (Hrs) and Costs				21,500

Assumptions:

^a This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for (GS-13, Step 5, \$40.50 + 60%) for Managerial, \$48.08 (GS-12, Step 1, \$30.05 + 60%) for Technical, and \$26.00 for Administrative. Rates are from the Office of Personnel Management (OPM) “2015 General Schedule” which excludes locality rates.

^b The semiannual report would have to be completed twice per year.

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

FR Part 63, Subpart RRRR) (Amendments)

(E) Technical person-hrs. per year (E=CxD)	(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$)
2,332	116.6	233.2	\$232,419
9,328	466.4	932.8	\$929,675
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
6,996	349.8	699.6	\$697,256
1,166	58.3	116.6	\$116,209
1,166	58.3	116.6	\$116,209
24,136			\$2,091,768
2,332	116.6	233.2	\$232,419
6,996	349.8	699.6	\$697,256
6,996	349.8	699.6	\$697,256
11,660	583	1166	\$1,162,093
75,790	3789.5	7579	\$7,553,607
13,992	699.6	1399.2	\$1,394,512
5,830	291.5	583	\$581,047
13,992	699.6	1399.2	\$1,394,512
6,996	349.8	699.6	\$697,256
166,272			\$14,409,957
190,000			\$16,500,000
			\$700,000
			\$17,200,000

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

r; \$90.34 per hour for Technical labor, and \$37.72 per hour for Clerical
onal Industry-Specific Occupational Employment and Wage
l Compensation.” The rates have been increased by 110% to account

ports and also four hours twice per year for the SSM reports.

CFR Part 63, Subpart RRRR) (Amendments)

(E) Clerical person-hours per year (E=Cx0.1)	(F) Annual costs (\$/yr)
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
1399.2	\$754,471
233.2	\$125,745
233.2	\$125,745
	\$1,006,000

nt for government overhead expenses: \$64.80
 2 (GS-6, Step 3, \$16.26 + 60%) for Clerical. These
 ites of pay.

**Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting
Year 1 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	0
Due To Final Revisions ^e	8	1	8
4 Add-on control performance test ^f	16	0	0
Repeat performance test ^g			
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	30	1	30
<i>Subtotal for Reporting Requirements</i>			
8 Record/transmit/disclose ^k	2	52	0
Due To Final Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<i>Subtotal for Recordkeeping Requirements</i>			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

- ^a It is assumed that there are sixteen sources that are subject to the standard, and no additional new sources will become
- ^b This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wages by Detailed Occupation." The rates have been increased by 110% to account for the benefit packages available to those employees.
- ^c It is assumed that each respondent will take 4 hours to read the rule and instructions.
- ^d The final RTR amendments do not impact this item. The current ICR assumes each respondent will take ten hours, once per year.
- ^e No training hours are expected due to the final rule revisions.
- ^f Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, with a testing contractor, plan and attend the test, review the test report, and load it to ERT. There were no Surface Coating of Metal Industry to have performance testing costs.
- ^g It is assumed that 5 percent of respondents will have to repeat performance tests.
- ^h The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in final RTR amendments do not impact this item.
- ⁱ The final RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours twice per year.
- ^j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take eight hours once per year.
- ^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. ERT is the final rule. It is assumed that this will not increase labor.
- ^l We are eliminating the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with eliminating the SSM exemption are also associated with the use of electronic reporting and include time to become familiar with CEDRI and the new rule.

j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hou

**ting Requirements for the Surface Coating of Metal Furniture NESHAP
dments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year ^a	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year ^b
16	16	64	3.2	6.4	73.6	\$6,379
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
						\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
			74			\$6,379
0	0	0	0	0	0	\$0
16	32	256	12.8	25.6	294.4	\$25,514
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
			294			\$25,514
						\$31,900
						\$0
	48					\$31,900

subject to the rule over the next three years.

r hour for Technical labor, and \$37.72 per hour for Clerical labor. These rates are from the United States
age Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1,
mployed by private industry.

per year to plan activities and train staff.

ithin 3 years of the effective date of the revised standards. Labor totals include hours for the facility to obtain the
etal Furniture facilities (subpart RRRR) using add-on controls to comply. We do not anticipate any facilities in this

clude hours for the facility to coordinate with suppliers, and gather information on monitoring and emissions. The

ve times per year to complete task.

: twice per year to complete reports.

PA is requiring sources to electronically submit semiannual reports starting 2 years after the effective date of the

on of the SSM exemption include time for re-evaluating previously developed SSM record systems in year one.
ni-annual reporting form. Two responses with 8 hours per response.

r annually to store and file reports.

**Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting
Year 2 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	0
Due To Final Revisions ^e	8	1	8
4 Add-on control performance test ^f	16	0	0
Repeat performance test ^g			
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	8	2	16
Subtotal for Reporting Requirements			
8 Record/transmit/disclose ^k	2	52	0
Due To Final Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0
10 Reporting and recordkeeping	0	0	0
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

^a It is assumed that there are sixteen sources that are subject to the standard, and no additional new sources will become

^b This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wages by Detailed Occupation." The rates have been increased by 110% to account for the benefit packages available to those employees.

^c It is assumed that each respondent will take 4 hours to read the rule and instructions.

^d The final RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours, on

^e No training hours are expected due to the final rule revisions.

^f Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, with a testing contractor, plan and attend the test, review the test report, and load it to ERT. There were no Surface Coating of Metal Industry to have performance testing costs.

^g It is assumed that 5 percent of respondents will have to repeat performance tests.

^h The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in final RTR amendments do not impact this item.

ⁱ The final RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours twel

^j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take eight hours

^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. ERT final rule. It is assumed that this will not increase labor.

^l We are eliminating the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with eliminating SSM are also associated with the use of electronic reporting and include time to become familiar with CEDRI and the sen

j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hou

**ting Requirements for the Surface Coating of Metal Furniture NESHAP
dments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year ^a	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year ^b
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
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	\$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	0	0	\$0
			0			\$0
						\$0
						\$0
	0					\$0

subject to the rule over the next three years.

r hour for Technical labor, and \$37.72 per hour for Clerical labor. These rates are from the United States
age Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1,
mployed by private industry.

ce per year to plan activities and train staff.

ithin 3 years of the effective date of the revised standards. Labor totals include hours for the facility to obtain the
etal Furniture facilities (subpart RRRR) using add-on controls to comply. We do not anticipate any facilities in this

clude hours for the facility to coordinate with suppliers, and gather information on monitoring and emissions. The

ve times per year to complete task.

: twice per year to complete reports.

PA is requiring sources to electronically submit semiannual reports starting 2 years after the effective date of the

on of the SSM exemption include time for re-evaluating previously developed SSM record systems in year one.
ni-annual reporting form. Two responses with 8 hours per response.

r annually to store and file reports.

**Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting
Year 3 (Amendments)**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	0
Due To Final Revisions ^e	8	1	8
4 Add-on control performance test ^f	16	0	0
Repeat performance test ^g			
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	8	2	16
Subtotal for Reporting Requirements			
8 Record/transmit/disclose ^k	2	52	0
Due To Final Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0
10 Reporting and recordkeeping	0	0	0
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

- ^a It is assumed that there are sixteen sources that are subject to the standard, and no additional new sources will become
- ^b This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wages by Detailed Occupation." The rates have been increased by 110% to account for the benefit packages available to those employees.
- ^c It is assumed that each respondent will take 4 hours to read the rule and instructions.
- ^d The final RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours, on average, to complete this item.
- ^e No training hours are expected due to the final rule revisions.
- ^f Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, with a testing contractor, plan and attend the test, review the test report, and load it to ERT. There were no Surface Coating of Metal Industry to have performance testing costs.
- ^g It is assumed that 5 percent of respondents will have to repeat performance tests.
- ^h The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in final RTR amendments do not impact this item.
- ⁱ The final RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours twice per year to complete this item.
- ^j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take eight hours twice per year to complete this item.
- ^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. Emissions from the final rule. It is assumed that this will not increase labor.

ⁱ We are eliminating the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with eliminating the exemption are also associated with the use of electronic reporting and include time to become familiar with CEDRI and the system.

^j The final RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour to complete the reporting.

**ting Requirements for the Surface Coating of Metal Furniture NESHAP
dments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year ^a	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year ^b
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
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	\$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
						\$0
			0			\$0
						\$0
						\$0
						\$0
	0					\$0

subject to the rule over the next three years.

r hour for Technical labor, and \$37.72 per hour for Clerical labor. These rates are from the United States
age Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1,
mployed by private industry.

ce per year to plan activities and train staff.

ithin 3 years of the effective date of the revised standards. Labor totals include hours for the facility to obtain the
etal Furniture facilities (subpart RRRR) using add-on controls to comply. We do not anticipate any facilities in this

clude hours for the facility to coordinate with suppliers, and gather information on monitoring and emissions. The

ve times per year to complete task.

: twice per year to complete reports.

PA is requiring sources to electronically submit semiannual reports starting 2 years after the effective date of the

on of the SSM exemption include time for re-evaluating previously developed SSM record systems in year one. Semi-annual reporting form. Two responses with 8 hours per response.

ir annually to store and file reports.

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping Requirements for the Surface Coating of Metal Furniture NESI

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	320	32	16	368	\$31,900
2	0	0	0	0	\$0
3	0	0	0	0	\$0
Total	320	32	16	368	\$31,900
Average	107	11	5.3	123	\$11,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	16	48	74	294	368
2	16	0	0	0	0
3	16	0	0	0	0
Total	48	48	74	294	368
Average	16	16	25	98	123

(a) = Average annual additional costs per respondent: \$690

**Accounting and Reporting
HAP (Amendments)**

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$31,900
\$0	\$0
\$0	\$0
\$0	\$31,900
\$0	\$11,000
Hours per Response	Hours Per Respondent
8.0	23
0	0
0	0
8.0	23
2.7	7.7

**Table 5 - Annual Agency Burden and Cost of Recordkeeping and Reporting F
Year 1 (Amendm**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Initial performance test ^{a, c}	24	0
2 Repeat performance test ^d	24	0
3 Report review		
a) Initial notification ^e	4	1
b) Performance test report ^f	8	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Final Revisions ⁱ	2	2
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are nine sources that are subject to the standard, and no additional new sources will

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule account for the benefit packages available to government employees.

^c The final RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance hours for the agency to travel to and from the facility to attend the test. There are no Surface Coating of Metal Furniture facilities (subpart RRRR) using add-on controls to comply. With the final periodic testing would not add any new testing burden.

^e It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent

^f It is assumed that it will take eight hours to review the test report for each respondent.

^g The final RTR amendments do not impact this item. The current ICR assumes that it will take eight hours, or

^h The final RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to

ⁱ EPA is finalizing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost record systems in year one.

**Requirements for the Surface Coating of Metal Furniture NESHAP -
Plants)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	16	64	3.2	6.4	\$3,451
74					\$3,500

It will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

estimate the task for each respondent.

Performance testing, within 3 years of the effective date of the revised standards. Labor totals include

We do not anticipate any facilities in this industry to have performance testing costs. Therefore,

respondent.

Once a year to review the compliance stats for each respondent.

to review the test reports, twice a year for each respondent.

Costs associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 6 - Annual Agency Burden and Cost of Recordkeeping and Reporting F
Year 2 (Amendm**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Initial performance test ^{a, c}	24	0
2 Repeat performance test ^d	24	0
3 Report review		
a) Initial notification ^e	4	1
b) Performance test report ^f	8	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Final Revisions ⁱ	2	2
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are nine sources that are subject to the standard, and no additional new sources will

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule account for the benefit packages available to government employees.

^c The final RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance hours for the agency to travel to and from the facility to attend the test. There are no Surface Coating of Metal Furniture facilities (subpart RRRR) using add-on controls to comply. With the final periodic testing would not add any new testing burden.

^e It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent

^f It is assumed that it will take eight hours to review the test report for each respondent.

^g The final RTR amendments do not impact this item. The current ICR assumes that it will take eight hours, or

^h The final RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to

ⁱ EPA is finalizing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost record systems in year one.

**Requirements for the Surface Coating of Metal Furniture NESHAP -
Plants)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
0					\$0

It will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

estimate the task for each respondent.

Performance testing, within 3 years of the effective date of the revised standards. Labor totals include

We do not anticipate any facilities in this industry to have performance testing costs. Therefore,

respondent.

Once a year to review the compliance stats for each respondent.

to review the test reports, twice a year for each respondent.

Costs associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 7 - Annual Agency Burden and Cost of Recordkeeping and Reporting F
Year 3 (Amendm**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Initial performance test ^{a, c}	24	0
2 Repeat performance test ^d	24	0
3 Report review		
a) Initial notification ^e	4	1
b) Performance test report ^f	8	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Final Revisions ⁱ	2	2
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are nine sources that are subject to the standard, and no additional new sources will

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule account for the benefit packages available to government employees.

^c The final RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance hours for the agency to travel to and from the facility to attend the test. There are no Surface Coating of Metal Furniture facilities (subpart RRRR) using add-on controls to comply. With the final periodic testing would not add any new testing burden.

^e It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent

^f It is assumed that it will take eight hours to review the test report for each respondent.

^g The final RTR amendments do not impact this item. The current ICR assumes that it will take eight hours, or

^h The final RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to

ⁱ EPA is finalizing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost record systems in year one.

**Requirements for the Surface Coating of Metal Furniture NESHAP -
Plants)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
0					\$0

It will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

estimate the task for each respondent.

Performance testing, within 3 years of the effective date of the revised standards. Labor totals include

We do not anticipate any facilities in this industry to have performance testing costs. Therefore,

respondent.

Once a year to review the compliance stats for each respondent.

to review the test reports, twice a year for each respondent.

Costs associated with elimination of the SSM exemption include time for evaluating new SSM

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	64	3.2	6.4	74	\$3,500	\$0	\$3,500
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total	64	3.2	6.4	74	\$3,500	\$0	\$3,500
Average	21	1.1	2.1	25	\$1,200	\$0	\$1,200

Year	Number of Responses	Total Hours
1	16	74
2	0	0
3	0	0
Total	16	74
Average	5.3	25

(a)

(a) = Average annual additional hours per respondent: 4.6