

**Table 1: Annual Respondent Burden and Cost - NESHAP for the Surface Coating of Large H**

Burden Item	(A)	(B)	(C)
	Person-Hours per occurrence	Number of occurrences per year	Person-Hours per respondent per year (C=A*B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with regulatory requirements <sup>c</sup>	4	1	4
B. Plan activities <sup>d</sup>	8	1	8
C. Training <sup>d</sup>	8	1	8
D. Gather information, monitor, and inspect <sup>e</sup>	12	12	144
E. Process/compile and review <sup>f</sup>	8	12	96
F. Complete excess emission report <sup>g</sup>	8	1	8
G. Complete startup, shutdown, malfunction report <sup>g</sup>	8	1	8
H. Complete semiannual report <sup>h</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarization with regulatory requirements	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system			
Record/disclose <sup>i</sup>	1	52	52
Store/file	0.25	2	0.5
E. Time to enter information			
F. Audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COSTS (rounded) <sup>j</sup></b>			
<b>TOTAL CAPITAL AND O&amp;M COST (rounded): <sup>j</sup></b>			
<b>GRAND TOTAL (rounded): <sup>j</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 10. There will be no a
- <sup>b</sup> This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.9 Bureau of Labor Statistics, June 2017, “Table 2. Civilian Workers, by occupational and industry group.” The rates are for employees employed by private industry.
- <sup>c</sup> We have assumed that it will take 4 hours for existing respondents to refamiliarize themselves with rule requirements.
- <sup>d</sup> We have assumed that it will take eight hours for each respondent to plan activities and eight hours for training.

- <sup>e</sup> We have assumed that each respondent will take twelve hours twelve times per year to complete task.
- <sup>f</sup> We have assumed that each respondent will take eight hours twelve times per year to complete task.
- <sup>g</sup> We have assumed that 50% of respondents will have to submit an excess emission report and 50% of respondents will
- <sup>h</sup> We have assumed that each respondent will take eight hours twice per year to complete reports.
- <sup>i</sup> We have assumed that each respondent will take one hour two times per week to record and disclose information.
- <sup>j</sup> Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**

	\$112.98	\$149.35	\$54.81
(D)	(E)	(F)	(G)
Respondents per year <sup>a</sup>	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)
10	40	2	4
10	80	4	8
10	80	4	8
10	1440	72	144
10	960	48	96
5	40	2	4
5	40	2	4
10	160	8	16
		<b>3,266</b>	
10	520	26	52
10	5	0.25	0.5
		<b>604</b>	
		<b>3,870</b>	

Additional new sources that will become subject to the rule over the three-year period of this ICR.

\$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit package:

have to submit an SSM report .

**Respondant Rates**

(Source: United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Civilian Workers, by occupational and industry group.")

(H)
Annual costs (\$) <sup>b</sup>
\$5,037.14
\$10,074.29
\$10,074.29
\$181,337.18
\$120,891.46
\$5,037.14
\$5,037.14
\$20,148.58
<b>\$357,637</b>
\$65,482.87
\$629.64
<b>\$66,113</b>
<b>\$424,000</b>
<b>\$5,400</b>
<b>\$429,000</b>

<u>Labor Type</u>	<u>Total Compensation (\$/hr)</u>	<u>Loaded Rate</u> (Rate + 110%rate)
Mgmt.	\$71.12	\$149.35
Tech.	\$53.80	\$112.98
Cler.	\$26.10	\$54.81

Hours per Response	
3870	# hours
30	# responses
129	hr/resp

partment of Labor,  
s available to those

**Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Hou**

Activity	(A)	(B)	(C)
	Person-hours per activity	Number of occurrences per year	Person hours per respondent per year (C = A*B)
Required activities			
Initial performance test <sup>c</sup>	24	1	24
Repeat performance test <sup>d</sup>	24	0.2	4.8
Report review			
a) Initial notification <sup>e</sup>	4	1	4
b) Notification of performance test <sup>e</sup>	8	1	8
c) Notification of compliance status <sup>e</sup>	8	1	8
d) Semiannual reports <sup>f</sup>	12	2	24
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>g</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 10. There will be no additic
- <sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates ha
- <sup>c</sup> We have assumed that it will take 24 hours to complete the task for each respondent.
- <sup>d</sup> We have assumed that tests will fail 20% of the time and that it will take 24 hours to complete the task. -
- <sup>e</sup> Based on Agency experience, we assume that it will take four hours to review the notification of the test and the test plan fo
- <sup>f</sup> We have assumed that it will take 12 hours to complete the task for each respondent.
- <sup>g</sup> Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Threshold and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**

	\$48.08	\$64.80	\$26.02	
(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)	Annual Costs (\$/yr) <sup>b</sup>
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
10	240	12	24	\$12,941.18
		<b>276</b>		<b>\$12,900</b>

Additional sources that will become subject to the rule over the three-year period of this ICR

\$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Step3, \$16.26 + 60%). These rates are have been increased by 60 percent to account for the benefit packages available to government employees.

per each respondent.

Agency Rates  
Source: Office of Personnel  
Management (OPM), 2017 General  
Schedule

	<b>Hourly Mean Wage</b>	<b>With Fringe &amp; Overhead</b>
(GS- 12, ste	30.05	\$48.08
(GS- 13, ste	40.5	\$64.80
(GS-6, step	16.26	\$26.02