

Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manuf

Burden Item	(A) Hours per occurrence	(B) No. of occurrences per respondent per year	(C) Hours per respondent per year (A x B)	(D) Respondents per year^a
1. Applications	N/A			
2. Survey and studies	N/A			
3. Acquisition, installation, and utilization of technical systems	N/A			
4. Reporting requirements				
A. Familiarization with the regulatory requirement	2	1	2	22
B. Required activities				
Initial notification ^c	1	1	1	0
Notification of compliance status ^c	1	1	1	0
Annual compliance certification ^d	1	1	1	22
Report of exceedences ^d	2	1	2	22
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
Reporting subtotal				
5. Recordkeeping requirements				
A. Familiarization with the regulatory requirement	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	0.25	1	0.25	219
F. Time and cost to perform VE observation ^e	1	1	1	219
G. Time to adjust existing ways to comply with previous applicable regulations	N/A			
H. Time to transmit or disclose information	0.25	1	0.25	219
I. Time for audits	N/A			
Recordkeeping subtotal				
TOTAL ANNUAL BURDEN AND COSTS (rounded):^f				
Capital and O&M Cost (see Section 6(b)(iii)):				
TOTAL COST:^f				

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major sources per ye percent of foundries will be required to respond and will refamiliarize with the rule requirements each year.

^b This ICR uses the following labor rates: Technical \$117.92 (\$56.15 + 110%); Managerial \$147.40 (\$70.19+ 110%); and Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group," increased by 110 percent to account for the benefit packages available to those employed by private industry. This ICR uses 10 hours are 10 percent of Technical hours.

^c This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.

^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate

^e Cost includes \$335 per facility to certify technical person in VE (EPA Method 9) testing.

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

id Clerical \$57.02 ($\$27.15 + 110\%$). These rates are from the United States group." The rates are from column 1, "Total compensation." The rates have been assumes that Managerial hours are 5 percent of Technical hours, and Clerical

estimate that 10 percent of the foundries will experience deviations.

117.92

147.4

57.02

hrs/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products

Burden Item	(A) EPA Hours per Occurrence	(B) No. of occurrences per plant per year	(C) EPA hours per plant per year (A x B)	(D) Plants per year^a
Report review				
Initial notification ^c	1	1	1	0
Notification of compliance status ^c	2	1	2	0
Annual compliance certification ^d	2	1	2	22
Report of exceedance ^d	2	1	2	22
TOTAL ANNUAL BURDEN ^e				

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major period of this ICR. We assume that 10 percent of foundries will be required to respond.

^b This cost is based on the average hourly labor rate as follows: Technical \$48.75 (GS-12, Step 1, \$30.47 60%); and Clerical \$26.38 (GS-6, Step 3, \$16.49 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. These rates are from the OPM, 2018 General Schedule, which excludes local percent to account for the benefit packages available to government employees.

^c This burden item applies to new facilities only. No new facilities are expected over the three-year period.

^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred or experience deviations.

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

Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)

TECH 48.75
MNG 65.71

CLER 26.38

(E) EPA technical hours per year (C x D)	(F) EPA managerial hours per year (E x 0.05)	(G) EPA clerical hours per year (E x 0.1)	(H) Total cost per year^b (\$)
0	0	0	\$0
0	0	0	\$0
44	2.2	4.4	\$2,405.63
44	2.2	4.4	\$2,405.63
100			\$4,810

r sources per year will become subject over the 3 year-

+ 60%); Managerial \$65.71 (GS-13, Step 5, \$41.07 + percent of Technical hours, and Clerical hours are 10 ity rates of pay. The rates have been increased by 60

rd of this ICR.

ccurred. We estimate that 10 percent of the foundries will