

**Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Subject to PPPP (Renewal)**

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 <sup>a</sup>
<b>1. Reporting requirements</b>				
a. Familiarization with the regulatory requirements	8	1	8	223
b. Process/review information	4	4	16	223
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 <sup>c</sup>	2	1.05	2.1	0
vi. Report of performance test <sup>c</sup>	10	1.05	10.5	0
vii. Semiannual report <sup>d</sup>	6	2	12	223
viii. Excess emissions report	2	2	4	223
ix. Startup, shutdown, malfunction report <sup>e</sup>	2	1	2	56
<b>Subtotal for Reporting Requirements</b>				
<b>2. Recordkeeping requirements</b>				
a. Familiarization with the regulatory requirements	<i>See 1.a.</i>			
b. Plan activities	12	1	12	223
c. Implement activities	12	1	12	223
d. Maintain record system for material used	20	1	20	223
e. Time to enter information				
i. Material usage <sup>f</sup>	0.5	365	182.5	223
ii. Compliance calculation <sup>g</sup>	2	12	24	223
f. Time to train personnel	10	1	10	223
g. Store, file, and maintain records <sup>h</sup>	2	12	24	223
h. Retrieve records/reports <sup>i</sup>	1	12	12	223
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Cost (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 there are approximately 223 respondents, with no additional new sources becoming subject

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$1 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for inflation in the private industry.

- <sup>c</sup> We have assumed that 5 percent of respondents will repeat the initial performance test due to failure.
- <sup>d</sup> We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- <sup>e</sup> It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction reports.
- <sup>f</sup> We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAPs and mass fraction of coating solids for each coating.
- <sup>g</sup> We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- <sup>h</sup> We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- <sup>i</sup> We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- <sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Surface Coating (40 CFR Part 63, Subpart**

(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) Cost per year (\$) <sup>b</sup>
1,784	89.2	178.4	\$233,689.73
3,568	178.4	356.8	\$467,379.46
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
2,676	133.8	267.6	\$350,534.59
892	44.6	89.2	\$116,844.86
112.0	5.6	11.2	\$14,671.10
<b>10,387</b>			<b>\$1,183,120</b>
2,676	133.8	267.6	\$350,534.59
2,676	133.8	267.6	\$350,534.59
4,460	223	446	\$584,224.32
40,698	2,034.9	4,070	\$5,331,046.92
5,352	267.6	535.2	\$701,069.18
2,230	111.5	223	\$292,112.16
5,352	267.6	535.2	\$701,069.18
2,676	133.8	267.6	\$350,534.59
<b>76,037</b>			<b>\$8,661,126</b>
<b>86,400</b>			<b>\$9,840,000</b>
			<b>\$66,900</b>
			<b>\$9,910,000</b>

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

948 # responses  
91 hr per resp

to the rule over the three-year period of this ICR.

17.92 per hour for Technical labor, and \$57.02 per hour  
3, "Table 2. Civilian Workers, by Occupational and  
count for the benefit packages available to those

once per year.

ΔP for each coating, thinner, or cleaning material, and

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Products Surface Finishing, Part 63, Subpart P (Renewal)**

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrences per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person hrs per year (E=CxD)	(F) Management person hrs per year (F=Ex0.05)
1. Initial performance test	24	1	24	0	0	0
2. Repeat performance test	24	0.2	4.8	0	0	0
3. Report review						
a. Initial notification	8	1	8	0	0	0
b. Notification of compliance status	8	1	8	0	0	0
c. Notification of construction/reconstruction	8	1	8	0	0	0
d. Notification of actual startup	8	1	8	0	0	0
e. Notification of performance test	8	1.05	8.4	0	0	0
f. Report of performance test	8	1.05	8.4	0	0	0
g. Semiannual report <sup>c</sup>	12	2	24	223	5,352	267.6
h. Excess emissions report <sup>d</sup>	4	2	8	223	1,784	89.2
i. Startup, shutdown, malfunction report	8	1	8	56	448	22.4
<b>Total (rounded): <sup>e</sup></b>						<b>8,720</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 223 respondents, with no additional new sources becoming subject to the period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Civilian rate of \$16.49 (GS-11, Step 3, \$10.31 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which pay.

<sup>c</sup> We have assumed that it will take 12 hours two times per year to review the semiannual report.

<sup>d</sup> We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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

**ace Coating (40 CFR**

(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) <sup>b</sup>
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
535.2	\$292,612.57
178.4	\$97,537.52
44.8	\$24,493.73
	<b>\$415,000</b>

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

rule over the three-year

ment overhead expenses:  
 erical rate of \$26.38 (GS-6,  
 excludes locality rates of

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Cos</b>				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent
CEMS <sup>a</sup>	\$16,000	0	\$0	\$1,200
Total <sup>b</sup>			\$0	

<sup>a</sup> We assume that 25 percent of existing facilities use add-on controls. (223 x 0.25 = 55.75)

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

<b>Number of Respondents</b>				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents <sup>1</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	223	0	0
2	0	223	0	0
3	0	223	0	0
Average	0	223	0	0

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC) +D
Initial notification	0	0	0	0
Notification of compliance status	0	0	0	0
Notification of construction/reconstruction	0	0	0	0
Notification of actual startup	0	0	0	0
Notification of performance test	0	0	0	0
Report of performance test	0	0	0	0
Semiannual report	223	2	0	446

Excess emissions report	223	2	0	446
Startup, shutdown, malfunction report	56	1	0	56
			Total	948

ts	
(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
55.75	\$66,900
	\$66,900

(E)
Number of Respondents (E=A+B+C-D)
223
223
223
223