

Table 1: Annual Respondent Burden and Cost – NSPS for Automobile and Light Duty Truck S

117.92

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per respondent per Year	(C) Person hours per respondent per year (AxB)	(D) Number of respondents per Year ^a	(E) Technical person hours per year (CxD)
1. Applications ^a	17.4	1	17.4	2	34.8
2. Survey and studies	116.5	1	116.5	2	233
3. Reporting requirements					
A. Familiarization with the regulatory requirements	8.7	1	8.7	72	626.4
B. Required activities					
Initial performance test ^c	2,434.8	1	2,434.8	2	4,869.60
Demonstration of CMS	N/A				
Repeat performance test ^{c, d}	573.9	1	573.9	0.4	229.56
C. Create information	See 3B				
D. Gather existing information	See 3E				
E. Write Report					
Notification of construction/reconstruction	1.7	1	1.7	2	3.4
Notification of actual startup	1.7	1	1.7	2	3.4
Notification of initial performance test	35.7	1	35.7	2	71.4
Report of performance test	See 3B				
Excess emission reports					
VOC emission reports	8.7	4	34.8	72	2,505.6
Temperature reports	26.1	2	52.2	72	3,758.4
Subtotal for Reporting Requirements					
4. Recordkeeping Requirements					
A. Familiarization with the regulatory requirements	8.7	1	8.7	72	626.4
B. Plan activities	17.4	1	17.4	72	1,252.8
C. Implement activities					
Monthly performance test	1,669.6	1	1669.6	72	120,211.2
D. Develop record system	4,347.8	1	4347.8	2	8,695.6
E. Time to enter information					
Records of temperature	417.4	1	417.4	72	30,052.8
F. Train personnel	34.8	1	34.8	72	2,505.6
G. Audits	17.4	1	17.4	72	1,252.8
5. Equipment and analytical evaluation expense					
A. Continuous monitoring & evaluation	34.8	1	34.8	72	2,505.6
B. Routine testing and maintenance	52.2	1	52.2	72	3,758.4
C. Systems of manage data	34.8	1	34.8	72	2,505.6
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ^e					
TOTAL CAPITAL AND O&M COSTS (rounded): ^e					
GRAND TOTAL (rounded): ^e					

Assumptions

^a We have assumed that there are approximately 70 existing respondents, with 2 new respondents per year over the next 3

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.9 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June Occupational and Industry Group.” The rates are from column 1, “Total Compensation.” The rates have been increased packages available to those employed by private industry.

^c It is assumed the EPA Reference Method 24 test performed on the coatings used by the respondents is generally done by the test results to the respondents. It is further assumed that the coatings manufacturers routinely perform an EPA Metho control measure, so there will be no additional cost incurred by the coatings manufacturers.

^d Rate of failed performance tests is 20 percent.

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

Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

147.4 57.02

(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Labor Costs per Year ^b
1.74	3.48	\$4,558.52
11.65	23.3	\$30,521.14
31.32	62.64	\$82,053.39
243.48	486.96	\$637,878.64
11.478	22.956	\$30,070.52
0.17	0.34	\$445.37
0.17	0.34	\$445.37
3.57	7.14	\$9,352.83
125.28	250.56	\$328,213.56
187.92	375.84	\$492,320.33
14,186		\$1,615,859.68
31.32	62.64	\$82,053.39
62.64	125.28	\$164,106.78
6010.56	12021.12	\$15,746,705.51
434.78	869.56	\$1,139,054.04
1,502.64	3005.28	\$3,936,676.38
125.28	250.56	\$328,213.56
62.64	125.28	\$164,106.78
125.28	250.56	\$328,213.56
187.92	375.84	\$492,320.33
125.28	250.56	\$328,213.56
199,372		\$22,709,664
214,000		\$24,300,000
		\$128,000
		\$24,400,000

489 hr/resp

3 years of this ICR.

\$22.02 per hour for Technical labor, and \$57.02 per hour for Civilian Workers, by 2018, “Table 2: Civilian Workers, by Industry,” Table 2.1, Table 2.2, and Table 2.3, by 110 percent to account for the benefit

by the coatings manufacturers, who provide 24-hour analysis on their coatings as a quality

Table 2: Average Annual EPA Burden and Cost – NSPS for Automobile and Light Duty Truck

48.75

Burden Items	(A) Person hours per occurrence	(B) Number of occurrences per Plant per Year	(C) EPA hours per respondent per year (AxB)	(D) Plants per Year ^a	(E) Technical hours per year (CxD)
Initial performance test					
New Plant	20.9	1.2	25.08	2	50.16
Report review					
New Plant					
Notification of construction	1.7	1	1.7	2	3.4
Notification of initial startup	0.4	1	0.4	2	0.8
Notification of actual startup	0.4	1	0.4	2	0.8
Notification of initial performance test ^c	0.4	1.2	0.48	2	0.96
Review test results ^c	7	1.2	8.4	2	16.8
Existing Plant					
VOC emission reports	1.7	4	6.8	72	489.6
Temperature reports	1.7	2	3.4	72	244.8
TOTAL COST (rounded) ^d					

Assumptions

^a We have assumed that there are approximately 70 existing respondents, with 2 new respondents per year over the next 3 y

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government Managerial, \$48.75 for Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) excludes locality rates of pay.

^c Rate of failed performance tests is 20 percent.

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

Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

65.71 26.38

(F) Managem ent hours per year (Ex0.05)	(G) Clerical Hours per Year (Ex0.1)	(H) Total costs per year^b
2.51	5.02	\$2,742.42
0.17	0.34	\$185.89
0.04	0.08	\$43.74
0.04	0.08	\$43.74
0.05	0.10	\$52.49
0.84	1.68	\$918.51
24.48	48.96	\$26,768.15
12.24	24.48	\$13,384.07
928		\$44,100

years of this ICR.

t overhead expenses: \$65.71 for
4) "2018 General Schedule" which