

Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (HHHHH) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements ^c	4	1	4	43	172
B. Required Activities					
Initial CMS performance evaluation ^d	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan ^e	40	1	40	0	0
Pre-compliance report ^f	40	1	40	0	0
Notification of performance test/re-test ^g	2	1	2	0	0
Performance test/re-test report ^g	10	1	10	0	0
Notification of initial CMS performance evaluation	2	1	1	0	0
Notification of compliance status ^g					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change ^h	8	1	8	4	32
Semi-annual compliance report - no deviations ⁱ	4	2	8	39	312
Semi-annual compliance report - with deviations ⁱ	12	2	24	4	96
Startup, shutdown, and malfunction report ^j	8	1	8	2	16
LDAR report ^k	125	2	250	43	10,750
Emissions averaging report ^l	20	1	20	4	80
Subtotal for Reporting Requirements					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system ^m	40	1	40	0	0
E. Develop startup, shutdown, malfunction plan ⁿ	100	1	100	0	0

F. Develop QA/QC Plan for CMS ^o	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	43	65
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	43	15,695
b. Compile data	24	2	48	43	2,064
c. Information for semi-annual reports	16	2	32	43	1,376
d. LDAR recordkeeping	See 3C				
H. Calibration of CMS	376	1	376	43	16,168
I. Time to train personnel ^{p, q}	40	1	40	0	0
J. Refresher course ^q	16	1	16	43	688
K. Time for audits	N/A				0
Subtotal for Recordkeeping Requirements					
Total Labor Burden and Costs (rounded) ^r					
Total Capital and O&M Cost (rounded) ^r					
Grand Total (rounded) ^r					

Assumptions:

- ^a There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the period of this ICR.
- ^b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$51.00 for unskilled labor from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupation, by sex, race, and hispanic or latino ethnicity, from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available in the industry.
- ^c Assume all 43 facilities will re-familiarize with the regulatory requirements each year.
- ^d Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification. Initial CMS performance evaluation is assumed to be completed by the end of the first year.
- ^e Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emissions averaging.
- ^f Assumes 50 percent of the new facilities will submit a pre-compliance report.
- ^g Assumes all facilities will comply by submitting engineering calculations and design calculations, and that no facilities will use alternative standards.
- ^h Assumes 10 percent of the facilities will implement process changes each year over the three year period of this ICR.
- ⁱ Assumes 10 percent of the facilities will have deviations and 90% of facilities will have no deviations.
- ^j Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent with the requirements.
- ^k Assumes all facilities will be subject to the equipment leak standards. Assume an average of 125 hours per report.
- ^l Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.
- ^m Assumes 40 hours to develop a record system for recording parameter monitoring information.
- ⁿ Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hours.
- ^o Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring information.
- ^p Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.
- ^q Assumes 40 hours to train personnel and 16 hours for an annual refresher course.
- ^r Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
9	17	\$22,909
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
2	3	\$4,262
16	31	\$41,555
5	10	\$12,786
1	2	\$2,131
538	1,075	\$1,431,793
4	8	\$10,655
13,177		\$1,526,091
0	0	\$0
0	0	\$0

Labor Rates	
Management	\$141.06
Technical	\$120.27
Clerical	\$58.67

0	0	\$0
3	6	\$8,591
785	1570	\$2,090,417
103	206	\$274,904
69	138	\$183,269
808.4	1,616.8	\$2,153,416
0	0	\$0
34.4	68.8	\$91,635
0	0	\$0
41,464		\$4,802,232
54,600		\$6,330,000
		\$907,000
		\$7,240,000

g the three-year period of this ICR.

3.67 for clerical labor. These rates are
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 lable to those employed by private

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 to use emissions averaging.

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ie plan.

of 100 hours.

ng systems included in the rule.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing Subpart HHHHH (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (CxD)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Initial Performance Test ^c	2	1	2	0	0
F. Review Performance Test Report ^c	8	1	8	0	0
G. Review Repeat Performance Test Report ^{c,d}	8	1	8	0	0
H. Review Notification of Initial CMS Performance Evaluation ^e	2	1	2	0	0
I. CMS Performance Evaluation ^e	4	1	4	0	0
J. Review Emissions Averaging Plan ^f	12	1	12	0	0
K. Review Pre-compliance Report ^g	2	1	2	0	0
L. Review Notification of Compliance Status ^h					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change ⁱ	6	1	6	4	24
N. Review Semiannual Compliance Report ^j					
i. No deviations	2	1	2	39	78
ii. Deviations	4	1	4	4	16
O. Startup, shutdown, and malfunction report ^k	2	1	2	2	4
R. LDAR report ^l	2	1	2	43	86
S. Emissions averaging report ^m	4	1	4	4	16
TOTAL (rounded)ⁿ					

Assumptions:

- ^a There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over 1
- ^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased benefit packages available to government employees.
- ^c Assumes all facilities will comply by submitting engineering calculations based on: materials usage, materials HAP content (if applicable). Assumes no facilities will do performance tests.
- ^d Assume a 5% failure and re-test rate.
- ^e Initial CMS performance evaluation is only required for new sources. Assumes no performance evaluations are required for included in the rule.
- ^f Assumes that all existing facilities have already submitted emissions averaging plans.
- ^g Assumes 50 percent of the new facilities will submit a pre-compliance report.

- ^h. Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.
- ⁱ. Assumes 10 percent of the facilities will implement process changes each year over the three year period of this ICR.
- ^j. Assumes 10 percent of the facilities will have deviations and 90% of facilities will have no deviations.
- ^k. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent with the standards.
- ^l. Assumes all facilities will be subject to the equipment leak standards.
- ^m. Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.
- ⁿ. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(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
1.2	2.4	\$1,330.70
3.9	7.8	\$4,324.79
0.8	1.6	\$887.14
0.2	0.4	\$221.78
4.3	8.6	\$4,768.36
0.8	1.6	\$887.14
258		\$12,400

Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

the three-year period of this ICR.
 : rates are from the Office of
 by 60 percent to account for the
 t, and control efficiency from testing
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Capital/Startup vs. Operation and Maintenance (O&M) Costs

(A) Process	(B) Capital Startup Cost	(C) Number of Respondents	(D) Total Capital/ Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent
Process Vessels	\$30,000	0	\$0	\$16,000
Transfer Operations	N/A	N/A	N/A	\$3,100
Wastewater Systems	N/A	N/A	N/A	\$2,000
Totals (rounded)			\$0	

Note: Totals have been rounded to three significant figures.

Number of Respondents

Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents
1	0	43	0	0
2	0	43	0	0
3	0	43	0	0
Average	0	43	0	0

Total Annual Responses

(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	N/A	0
Notification of anticipated startup	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of applicability of standard	0	1	N/A	0
Emission averaging plan	0	1	N/A	0
Pre-compliance report	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Notification of initial CMS performance evaluation	0	1	N/A	0

Notification of compliance status	0	1	N/A	0
Notification of process change ^a	4	1	N/A	4
Semiannual report	43	2	N/A	86
Startup, shutdown, malfunction report ^b	2	1	N/A	2
LDAR report ^c	43	2	N/A	86
Emission averaging report ^d	4	1	N/A	4
			Total (rounded)	182

^a Assumes 10 percent of the facilities will implement process changes each year over the three-year period of this ICR.

^b Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent

^c Assumes all facilities will be subject to the equipment leak standards.

^d Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.

(F) Number of Respondents with O&M	(G) Total O&M, (E x F)
43	\$688,000
43	\$133,300
43	\$86,000
	\$907,000

\$907,000

(E) Number of Respondents
(E=A+B+C-D)
43
43
43
43

300 hours/response

with the plan.