

Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty T Subpart III) (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 ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with the regulatory requirements	4	1	4	43
b. Required activities				
i. Initial performance test ^c	24	1	24	0
ii. Repeat performance test ^d	24	0.05	1.2	0
iii. Compile and process data ^e	4	4	16	43
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 ^d	2	1	2	0
vi. Report of performance test ^d	10	1	10	0
vii. Semiannual report ^f	6	2	12	43
viii. Excess emissions report ^g	2	2	4	43
ix. Startup, shutdown, malfunction report ^h	2	1	2	11
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	See 3.a.			
b. Plan activities	12	1	12	43
c. Implement activities	12	1	12	43
d. Maintain record system for material used ⁱ	20	2	40	43
e. Time to enter information				
i. Material usage ^j	0.5	365	182.5	43
ii. Compliance calculation	2	12	24	43
f. Time to train personnel	10	1	10	43
g. Store, file, and maintain records ^k	2	12	24	43
h. Retrieve records/reports ^l	1	12	12	43
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^m				
Total Capital and O&M Cost (rounded) ^m				
Grand Total (rounded) ^m				

Assumptions:

- ^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and no new sources will be added.
- ^b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$75.00 for unskilled labor. These rates are based on the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupation and sex, 2018." The rates have been increased by 110 percent to account for the benefit packages available to respondents.
- ^c We assume it will take 24 hours to complete the initial performance test.
- ^d We assume 5 percent of respondents will need to repeat the performance test.
- ^e We assume each respondent will take four hours to compile and process data. This will occur four times per year.
- ^f We assume each respondent will take six hours to complete each semiannual report.
- ^g We assume each respondent will take two hours to complete excess emissions reports. This will occur two times per year.
- ^h We assume 25 percent of respondents will use add-on controls, and that each will take two hours per year to complete the required recordkeeping.
- ⁱ We assume it will take each respondent twenty hours to maintain the record system for materials used. This will occur once per year.
- ^j We assume each respondent will take 30 minutes to enter information on material usage. This will occur 365 times per year.
- ^k We assume it will take each respondent two hours to store, file, and maintain records. This will occur twelve times per year.
- ^l We assume it will take each respondent one hour to retrieve records or reports. This will occur twelve times per year.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ruck Surface Coating (40 CFR Part 63,

(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
172	8.6	17	\$22,908.68
0	0	0	\$0
0	0	0	\$0
688	34	69	\$91,634.72
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
516	26	52	\$68,726.04
172	8.6	17	\$22,908.68
22	1.1	2.2	\$2,863.59
1,805			\$209,042
516	26	52	\$68,726.04
516	26	52	\$68,726.04
1,720	86	172	\$229,086.80
7,848	392	785	\$1,045,208.53
1,032	52	103	\$137,452.08
430	22	43	\$57,271.70
1,032	52	103	\$137,452.08
516	26	52	\$68,726.04
15,651			\$1,812,649
17,500			\$2,020,000
			\$51,600
			\$2,070,000

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

hours	# responses	hr/response
17,500	183	96

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Table 2: Average Annual EPA Burden and Cost - NESHAP for Automobile and Light-duty Truck CFR Part 63, Subpart IIII) (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 ^a	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)
1. Initial performance test ^c	24	1	24	0	0	0
2. Repeat initial performance test ^d	24	0.05	1.2	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 ^d	2	1	2	0	0	0
f. Report of performance test/re-test ^d	8	1	8	0	0	0
g. Semiannual report ^e	12	2	24	43	1,032	52
h. Excess emissions report ^f	4	2	8	43	344	17
i. Startup, shutdown, malfunction report ^g	8	1	8	11	88	4.4
Total (rounded) ^h						1,680

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and that no new source standard.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These rates are based on the Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by the benefit packages available to government employees.

^c We assume it will take 24 hours to complete the initial performance test review.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e We assume it will take twelve hours to review semiannual reports.

^f We assume it will take four hours to review excess emissions reports. This will occur twice per year.

^g We assume 25 percent of respondents will use add-on controls, and that each report will take eight hours to review.

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

Surface Coating (40

(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
103	\$57,220.27
34	\$19,073.42
9	\$4,879.25
	\$81,200

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

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Capital/Startup vs. Operation and Maintenance (O&M) Cos				
(A)	(B)	(C)	(D)	(E)
Performance Testing	Capital Startup Cost for One Performance Test	Number of Respondents Doing Testing	Total Capital/Startup Cost (B x C)	Annual O&M Costs for One Respondent
CEM	\$16,000	0	\$0	\$1,200
Totals (rounded)			\$0	

Note: Totals have been rounded to three significant figures.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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	43	0	0
2	0	43	0	0
3	0	43	0	0
Average	0	43	0	0

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

Total Annual Responses				
(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	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test ^a	0	1.05	0	0
Report of performance test ^a	0	1.05	0	0
Semiannual report	43	2	0	86
Excess emission report	43	2	0	86

Startup, shutdown, malfunction report ^b	11	1	0	11
			Total	183

^a This ICR assumes 5 percent of respondents will need to repeat the performance test.

^b This ICR assumes 25 percent of respondents will complete startup, shutdown, malfunction report.

ts	
(F) Number of Respondents with O&M	(G) Total O&M, (E x F)
43	\$51,600
	\$51,600
Total	
	\$51,600

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