

**Table 1: Annual Respondent Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 103)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Familiarize with regulatory requirements <sup>c</sup>	25	1	25	93
4. Required activities for sources with add-on control devices <sup>d</sup>				
a. Initial performance test and report	410	1	410	0
b. Establish operating parameters	See 4A			
c. Prepare startup, shutdown, and malfunction plan	40	1	40	0
5. Required activities for sources using compliant materials and pollution prevention measures <sup>e, f</sup>				
a. Develop recordkeeping system				
1) Fiberglass manufacturing operations	22	1	22	0
2) Adhesive operations	1	1	1	0
3) Aluminum coating operations	6	1	6	0
b. Enter information into recordkeeping system				
1) Fiberglass manufacturing operations <sup>g</sup>	84	1	84	93
2) Adhesive operations <sup>h</sup>	12	1	12	93
3) Aluminum coating operations <sup>i</sup>	22	1	22	16
c. Work practice requirements <sup>j</sup>	2	12	24	16
6. Create information	See 5B			
7. Gather information	See 5B			
8. Notification requirements				
a. Initial notification that existing sources are subject to the standard <sup>k</sup>	24	1	24	0
b. Notification for new major sources				
1) Intent to construct and application for approval of construction	80	1	80	0
2) Start of construction	2	1	2	0
3) Anticipated startup date	2	1	2	0
4) Actual startup date	2	1	2	0
c. Request for compliance extension	N/A			
d. Notification of special compliance requirements	N/A			
e. Notification of performance tests	2	1	2	0
f. Notification of compliance status	4	1	4	0
9. Reporting requirements				
a. Semiannual compliance reports for all sources <sup>l</sup>	8	2	16	93
b. Additional reports for sources with add-on control devices <sup>m</sup>				
1) Quarterly compliance report for sources with exceedances	16	4	64	0

2) Request to return to semiannual compliance reporting	8	1	8	0
3) Control device performance test report	See 4A			
4) Operating range for monitored parameters	See 4B			
5) Startup, shutdown, malfunction	8	1	8	0
<b>Subtotal for Reporting Requirements</b>				
10. Recordkeeping requirements				
a. Familiarize with regulatory requirement	See 3			
b. Plan and develop record system	See 5A			
c. Record information	See 5B			
d. Records for area sources not subject to the standard	N/A			
11. Time to train personnel	N/A			
12. Time for audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Capital and O&amp;M Cost (rounded) <sup>n</sup></b>				
<b>Capital and O&amp;M Cost (rounded) <sup>n</sup></b>				
<b>Grand Total (rounded) <sup>n</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. The period of this ICR.

<sup>b</sup> This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employees.

<sup>c</sup> We have assumed that it will take the same length of time (25 hours) for both fiberglass and aluminum boat manufacture.

<sup>d</sup> New sources with add-on control devices will be required to perform initial performance test and report, and to prepare reports. Sources are anticipated over the three-year period of this ICR. We assume all existing sources are using the compliant materials.

<sup>e</sup> We have assumed that all of the existing facilities are complying with the regulations by using the compliant materials.

<sup>f</sup> We have assumed that there will be no new sources expected over the three-year period of this ICR.

<sup>g</sup> We have assumed that each of the respondents will take 84 hours to complete the fiberglass manufacturing operations.

<sup>h</sup> We have assumed that each respondent will take 12 hours to complete the adhesive operations requirements.

<sup>i</sup> We have assumed that 16 respondents will take 22 hours each to complete the aluminum coating operations requirements.

<sup>j</sup> We have assumed that 16 respondents will take 2 hours each to complete the work practice requirements.

<sup>k</sup> We have assumed that all of the existing respondents have already completed the initial notification requirements.

<sup>l</sup> We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance reporting.

<sup>m</sup> We have assumed that all of the existing facilities are complying with the regulations by using the compliant materials and optional add-on control devices.

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

70 percent subject to these rules – 1,675  
Total number of respondents subject to L  
25 percent subject to these rules = 4,534

rt 63, Subpart VVVV) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
2,325	116	233	\$309,666.75
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
12,096	605	1,210	\$1,611,066.24
1,728	86.4	173	\$230,152
352	17.6	35.2	\$46,882.88
384	19.2	38.4	\$51,144.96
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
1,488	74.4	149	\$198,186.72
0	0	0	\$0

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

0	0	0	\$0
0	0	0	\$0
<b>21,129</b>			<b>\$2,447,099.87</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
<b>0</b>			<b>\$0</b>
<b>21,100</b>			<b>\$2,450,000</b>
			<b>\$0</b>
			<b>\$2,450,000</b>

113 hrs/response

There will be no additional sources over the three-year

\$58.67 for clerical labor. These rates are from the "Total by private industry" column 1, "Total by private industry."

Operators to review the rules for each facility.

Startup, shutdown, and malfunction plan. No new air quality control technology and pollution prevention measures.

Startup and pollution prevention measures.

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on and pollution prevention measures and that none are

.QG requirements = 18,135

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 101.110) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrence s per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)
1. Familiarize with regulatory requirement	25	1	25	0	0
2. Enter and update information into agency recordkeeping system <sup>c</sup>	4	1	4	93	372
3. Notification review					
a. Review initial notification for existing sources <sup>d</sup>	2	1	2	0	0
b. Notifications for new major sources <sup>e</sup>					
1. Review intent to construct and application to construct	12	1	12	0	0
2. Start of construction	2	1	2	0	0
3. Anticipated startup date	2	1	2	0	0
4. Actual startup date	2	1	2	0	0
c. Review request for compliance extension	N/A				
d. Review special compliance requirements	N/A				
e. Review initial performance test and test plan	20	1	20	0	0
f. Review compliance status <sup>f</sup>	2	1	2	93	186
g. Area sources not subject to standard	N/A				
h. Review waiver application	N/A				
4. Reporting requirements					
a. Semiannual compliance reports for all sources <sup>g</sup>	4	2	8	93	744
b. Reports for sources with add-on control devices <sup>h</sup>					
1. Quarterly compliance report for source with exceedances <sup>i</sup>	4	4	16	0	0
2. Request to return to semiannual compliance reporting <sup>j</sup>	4	2	8	0	0
3. Review control device performance test report and operating range <sup>k</sup>	20	1	20	0	0
4. Review startup, shutdown, malfunction reports <sup>l</sup>	4	1	4	0	0
<b>Total (rounded) <sup>m</sup></b>					

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There three-year period of this ICR.

<sup>b</sup> 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 2019 Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent available to government employees.

<sup>c</sup> We have assumed that 93 respondents will each take 4 hours to enter and update information into agency recordkeeping system.

<sup>d</sup> We have assumed that all existing sources have already submitted the initial notification.

<sup>e</sup> We have assumed that there will be no new sources over the three-year period of this ICR.

- <sup>f</sup> We have assumed that it will take 2 hours to review the notification of compliance status.
- <sup>g</sup> We have assumed that it will take four hours two times per year to review the semiannual compliance report.
- <sup>h</sup> We have assumed that all of the existing facilities are complying with the regulations by using the compliant materials option and that none are using add-on control devices.
- <sup>i</sup> We have assumed that 20 percent of the quarterly compliance reports will be reviewed for exceedances.
- <sup>j</sup> We have assumed that no respondents will request to return to semiannual compliance reporting.
- <sup>k</sup> We have assumed that it will take 4 hours to review the startup, shutdown, malfunction report.
- <sup>l</sup> We have assumed that it will take 4 hours to review the startup, shutdown, malfunction report.
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



Part 63, Subpart VVVV)

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
0	0	\$0
18.6	37.2	\$20,625.91
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
9.3	18.6	\$10,312.96
37.2	74.4	\$41,251.82
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
<b>1,500</b>		<b>\$72,200</b>

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

will be no additional sources over the

rates are from the Office of Personnel  
 ment to account for the benefit packages

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on and pollution prevention measures

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
			Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
Information Collection Activity	Number of Respondents	Number of Responses		$E=(B \times C)+D$
Initial notification that existing sources are subject to the standard	0	1	0	0
Notification of intent to construct and application for approval of construction	0	1	0	0
Notification of start of construction	0	1	0	0
Notification of anticipated startup date	0	1	0	0
Notification of actual startup date	0	1	0	0
Notification of compliance status	0	1	0	0
Semiannual compliance reports of all sources	93	2	0	186
Quarterly compliance report	0	4	0	0
			<b>Total</b>	<b>186</b>