

**Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (4 Year 1**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements <sup>a</sup>	4	1	4
B. Required activities			
Initial oxidizer performance test <sup>c</sup>	30	0.07	2.1
Repeat oxidizer performance test <sup>c</sup>	30	0.07	2.1
Initial capture performance test, or review design criteria to ensure capture system meets design criteria for a permanent total enclosure (PTE) <sup>c, d</sup>	8	0.07	0.56
Repeat capture performance test <sup>c, d</sup>	8	0.07	0.56
Add-on control performance test <sup>e</sup>	30	1	30
Repeat add-on control performance test <sup>f</sup>	30	1	30
Emission rate limit compliance determination	16	12	192
Startup, shutdown, malfunction plan	32	1	32
C. Create information	See 4B		
D. Gather existing information <sup>g</sup>	60	1	60
E. Write Report			
Initial notification	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of compliance status	4	1	4
Performance test notification <sup>c, e, f</sup>	2	1	2
Performance test report <sup>c, e, f</sup>	10	1	10
Semiannual report of exceedances <sup>h</sup>	16	2	32
Semiannual report of no exceedances <sup>i, j</sup>	8	2	16
Startup, shutdown, malfunction report <sup>k</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 4B		
B. Plan activities	N/A		
C. Implement Activities	N/A		
D. Develop record system	N/A		
E. Revise record systems due to SSM revisions <sup>l</sup>	8	1	8
F. Become familiar with CEDRI for electronic filing of notifications and reports <sup>m</sup>	8	1	8
G. Time to enter records of all information required by standards <sup>n</sup>	4	52	208

H. Time to train personnel	N/A		
I. Time to adjust existing ways to comply with previously applicable requirements	N/A		
J. Time to transmit or disclose information <sup>o</sup>	0.25	2	0.5
K. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>Total Labor Burden and Cost (rounded) <sup>p</sup></b>			
<b>Total Capital and O&amp;M Cost (rounded) <sup>p</sup></b>			
<b>GRAND TOTAL (rounded) <sup>p</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources become burden to re-familiarize themselves with the regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.90 per hour for other workers. Source: United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupational Category and Industry, by Sex, Race, and Hispanic or Latino Ethnicity.” Rates increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> This is a one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization of control equipment. Startup costs were annualized over the 15-year life of control equipment at 7 percent interest. The number of occurrences of testing is based on the assumption that there are no new sources, no performance tests are expected to occur. It is assumed that the facility would contract out the coordinating and observing the test and reviewing the results.

<sup>d</sup> We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 9.

<sup>e</sup> Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, select a testing contractor, plan and attend the test, review the test report, and load it to ERT. A permit review is required for all testing. Sources do not already have a permit testing requirement. 21 sources undergo testing of their control devices.

<sup>f</sup> It is assumed that 5 percent of respondents will have to repeat performance tests. ( $30 \times 0.05 = 1.5$ , rounded up to 2) 21 sources submit notifications and test reports, and 2 additional sources submit re-test notification and test reports, for a total of 23 reports.

<sup>g</sup> Based on comments we received from industry consultation, 60 hrs per respondent is required to gather and evaluate information for testing.

<sup>h</sup> We have assumed that exceedances are reported semiannually. We have assumed that 10 percent of respondents will require testing.

<sup>i</sup> Reports indicating no exceedances are required semiannually.

<sup>j</sup> We have assumed that 90 percent of respondents will report no exceedances ( $48 \times 0.9 = 43.2$ , or 43 respondents, when rounded down).

<sup>k</sup> We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually ( $48 \times 0.1 = 4.8$ , rounded up to 5).

<sup>l</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed testing procedures and include time to become familiar with CEDRI and the semi-annual reporting form.

<sup>m</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.

<sup>n</sup> We have assumed that all information is entered on a weekly basis.

<sup>o</sup> We have assumed that each of the 48 respondents will take 15 minutes to transmit or disclose information twice a year.

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

10 CFR Part 63, Subpart SSSS) (Amendments)

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
48	192	9.6	19.2	\$25,150.46
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$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
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
	<b>221</b>			<b>\$25,150</b>
48	384	19.2	38.4	\$50,300.93
48	384	19.2	38.4	\$50,300.93
0	0	0	0	\$0

Lal
\$147.40
\$117.92
\$57.02

0	0	0	0	\$0
	<b>883</b>			<b>\$100,602</b>
	<b>1,100</b>			<b>\$126,000</b>
				<b>\$0</b>
	<b>1,100</b>			<b>\$126,000</b>

ing subject to the rule over the next three years. This ICR assumes each respondent will incur a

2 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been

ation of technology and systems needed to support recordkeeping and reporting. The one-time per respondent per year is annualized over the 15 year life of the control equipment. Because e performance testing costs, but some labor hours from facility staff would be involved with

1 204, so that capture efficiency does not need to be measured.

within 3 years of the effective date of the revised standards. Labor totals include hours for the v revealed that, of the 48 sources subject to Subpart SSSS, 30 add on control devices at 21

total of 23 notifications and 23 test reports.

ormation in preparation of semiannual reports

port exceedances ( $48 \times 0.1 = 4.8$ , or 5 respondents, when rounded).

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.1 = 4.8, or 5 respondents, when rounded).

loped SSM record systems in year one. Costs are also associated with the use of electronic

emi-annual reporting form.

<b>bor Rates</b>
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Managerial
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Technical
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Clerical
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These rates were updated 2/4/19 to match the United States Department of Labor, Bureau of Labor Statistics

, June 2018, "Table 2. Civilian Workers, by occupational and industry group

**Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (4 Year 2**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements <sup>a</sup>	4	1	4
B. Required activities			
Initial oxidizer performance test <sup>c</sup>	30	0.07	2.1
Repeat oxidizer performance test <sup>c</sup>	30	0.07	2.1
Initial capture performance test, or review design criteria to ensure capture system meets design criteria for a permanent total enclosure (PTE) <sup>c, d</sup>	8	0.07	0.56
Repeat capture performance test <sup>c, d</sup>	8	0.07	0.56
Add-on control performance test <sup>e</sup>	30	1	30
Repeat add-on control performance test <sup>f</sup>	30	1	30
Emission rate limit compliance determination	16	12	192
Startup, shutdown, malfunction plan	32	1	32
C. Create information	See 4B		
D. Gather existing information <sup>g</sup>	60	1	60
E. Write Report			
Initial notification	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of compliance status	4	1	4
Performance test notification <sup>c, e, f</sup>	2	1	2
Performance test report <sup>c, e, f</sup>	10	1	10
Semiannual report of exceedances <sup>h</sup>	16	2	32
Semiannual report of no exceedances <sup>i, j</sup>	8	2	16
Startup, shutdown, malfunction report <sup>k</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 4B		
B. Plan activities	N/A		
C. Implement Activities	N/A		
D. Develop record system	N/A		
E. Revise record systems due to SSM revisions <sup>l</sup>	8	1	8
F. Become familiar with CEDRI for electronic filing of notifications and reports <sup>m</sup>	8	1	8
G. Time to enter records of all information required by standards <sup>n</sup>	4	52	208

H. Time to train personnel	N/A		
I. Time to adjust existing ways to comply with previously applicable requirements	N/A		
J. Time to transmit or disclose information <sup>o</sup>	0.25	2	0.5
K. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>Total Labor Burden and Cost (rounded) <sup>p</sup></b>			
<b>Total Capital and O&amp;M Cost (rounded) <sup>p</sup></b>			
<b>GRAND TOTAL (rounded) <sup>p</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources become burden to re-familiarize themselves with the regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.90 per hour for other labor. United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupational Category and Industry,” increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> This is a one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization. Startup costs were annualized over the 15-year life of control equipment at 7 percent interest. The number of occurrences there are no new sources, no performance tests are expected to occur. It is assumed that the facility would contract out the coordinating and observing the test and reviewing the results.

<sup>d</sup> We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 9.

<sup>e</sup> Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, select a facility to obtain the testing contractor, plan and attend the test, review the test report, and load it to ERT. A permit review sources do not already have a permit testing requirement. 21 sources undergo testing of their control devices.

<sup>f</sup> It is assumed that 5 percent of respondents will have to repeat performance tests. ( $30 \times 0.05 = 1.5$ , rounded up to 2) 21 sources submit notifications and test reports, and 2 additional sources submit re-test notification and test reports, for a total of 23 reports.

<sup>g</sup> Based on comments we received from industry consultation, 60 hrs per respondent is required to gather and evaluate information.

<sup>h</sup> We have assumed that exceedances are reported semiannually. We have assumed that 10 percent of respondents will report exceedances.

<sup>i</sup> Reports indicating no exceedances are required semiannually.

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<sup>k</sup> We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually ( $48 \times 0.1 = 4.8$ , rounded to 5).

<sup>l</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed procedures and include time to become familiar with CEDRI and the semi-annual reporting form.

<sup>m</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.

<sup>n</sup> We have assumed that all information is entered on a weekly basis.

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



10 CFR Part 63, Subpart SSSS) (Amendments)

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
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	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
	<b>0</b>			<b>\$0</b>
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0

LaI
\$147.40
\$117.92
\$57.02

0	0	0	0	\$0
	<b>0</b>			<b>\$0</b>
	<b>0</b>			<b>\$0</b>
	<b>0</b>			<b>\$0</b>
	<b>0</b>			<b>\$0</b>

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These rates were updated 2/4/19 to match the United States Department of Labor, Bureau of Labor Statistics

, June 2018, "Table 2. Civilian Workers, by occupational and industry group

**Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (4 Year 3**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements <sup>a</sup>	4	1	4
B. Required activities			
Initial oxidizer performance test <sup>c</sup>	30	0.07	2.1
Repeat oxidizer performance test <sup>c</sup>	30	0.07	2.1
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Repeat add-on control performance test <sup>f</sup>	30	1	30
Emission rate limit compliance determination	16	12	192
Startup, shutdown, malfunction plan	32	1	32
C. Create information	See 4B		
D. Gather existing information <sup>g</sup>	60	1	60
E. Write Report			
Initial notification	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of compliance status	4	1	4
Performance test notification <sup>c, e, f</sup>	2	1	2
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Semiannual report of no exceedances <sup>i, j</sup>	8	2	16
Startup, shutdown, malfunction report <sup>k</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 4B		
B. Plan activities	N/A		
C. Implement Activities	N/A		
D. Develop record system	N/A		
E. Revise record systems due to SSM revisions <sup>l</sup>	8	1	8
F. Become familiar with CEDRI for electronic filing of notifications and reports <sup>m</sup>	8	1	8
G. Time to enter records of all information required by standards <sup>n</sup>	4	52	208

H. Time to train personnel	N/A		
I. Time to adjust existing ways to comply with previously applicable requirements	N/A		
J. Time to transmit or disclose information <sup>o</sup>	0.25	2	0.5
K. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>Total Labor Burden and Cost (rounded) <sup>p</sup></b>			
<b>Total Capital and O&amp;M Cost (rounded) <sup>p</sup></b>			
<b>GRAND TOTAL (rounded) <sup>p</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources become burden to re-familiarize themselves with the regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.90 per hour for other workers. Source: United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupational Category, by Industry, by Sex, Race, and Hispanic or Latino Ethnicity.” Rates increased by 110% to account for the benefit packages available to those employed by private industry.

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<sup>d</sup> We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 9.

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<sup>f</sup> It is assumed that 5 percent of respondents will have to repeat performance tests. (30 x 0.05 = 1.5, rounded up to 2) 21 sources submit notifications and test reports, and 2 additional sources submit re-test notification and test reports, for a total of 23 reports.

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<sup>h</sup> We have assumed that exceedances are reported semiannually. We have assumed that 10 percent of respondents will require a report.

<sup>i</sup> Reports indicating no exceedances are required semiannually.

<sup>j</sup> We have assumed that 90 percent of respondents will report no exceedances (48 x 0.9 = 43.2, or 43 respondents, when rounded down).

<sup>k</sup> We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually (48 x 0.1 = 4.8, or 5 reports).

<sup>l</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed control strategies and include time to become familiar with CEDRI and the semi-annual reporting form.

<sup>m</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.

<sup>n</sup> We have assumed that all information is entered on a weekly basis.

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

10 CFR Part 63, Subpart SSSS) (Amendments)

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
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
21	630	31.5	63	\$82,524.96
2	60	3	6	\$7,859.52
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
23	46	2.3	4.6	\$6,026
23	230	11.5	23	\$30,128
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
	<b>1,111</b>			<b>\$126,538</b>
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0

Lal
\$147.40
\$117.92
\$57.02

0	0	0	0	\$0
	<b>0</b>			<b>\$0</b>
	<b>1,100</b>			<b>\$130,000</b>
				<b>\$558,000</b>
	<b>1,100</b>			<b>\$690,000</b>

ing subject to the rule over the next three years. This ICR assumes each respondent will incur a

2 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been

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<b>bor Rates</b>
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Managerial
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Technical
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Clerical
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These rates were updated 2/4/19 to match the United States Department of Labor, Bureau of Labor Statistics

, June 2018, "Table 2. Civilian Workers, by occupational and industry group

**Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Surfa Part 63, Subpart SSSS) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs
1	960	48	96	1,104	\$126,000
2	0	0	0	0	\$0
3	966	48	97	1,111	\$130,000
Total	1,926	96	193	2,215	\$256,000
Average	642	32	64.2	738	\$85,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	48	144	221	883	1,104
2	48	0	0	0	0
3	48	69	1,111	0	1,111
Total	-	213	1,332	883	2,215
Average	48	71	444	294	738

Average annual additional costs per respondent:

\$5,650

## Ice Coating of Metal Coil (40 CFR

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$126,000
\$0	\$0
\$558,000	\$688,000
\$558,000	\$814,000
\$186,000	\$271,000

Hours per Response	Hours Per Respondent
8.0	23
-	0
16	23
-	46
10.4	15

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Surface Coating of Metal C Year 1**

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
Initial performance test <sup>a</sup>	48	0	0
Repeat performance test-retesting preparation	4	0	0
Repeat performance-retesting	48	0	0
Excess emissions enforcement activities	120	1	120
Review reports			
Notification of applicability	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of special compliance requirements	N/A		
Notification of compliance status	2	1	2
Notification of performance test <sup>c</sup>	4	1	4
Review of initial performance test report <sup>d</sup>	8	1	8
Review of repeat performance test report <sup>d</sup>	8	1	8
Semiannual report of excess emissions <sup>e, f</sup>	8	2	16
Semiannual report of no excess emissions <sup>g, h</sup>	2	2	4
Review of NESHAP waiver application	N/A		
Review startup, shutdown, malfunction report <sup>i</sup>	2	2	4
Review record systems due to SSM revisions <sup>j</sup>	2	2	4
<b>TOTAL (rounded) <sup>k</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources be initial performance tests for new sources are expected to occur.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). which excludes locality rates of pay.

<sup>c</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>d</sup> Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing VOC/HAP control devices and would require testing. Assuming a 5% failure rate, two control devices would need to

<sup>e</sup> It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when re

<sup>f</sup> It is assumed that reports of excess emissions are required semiannually.

<sup>g</sup> We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 responden

<sup>h</sup> It is assumed that reports of no excess emissions are required semiannually.

<sup>i</sup> We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed

<sup>j</sup> These are costs associated with evaluating new SSM record systems in year one.

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

Coil (40 CFR Part 63, Subpart SSSS) (Amendments)

(D)	(E)	(F)	(G)	(H)
Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
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	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
48	192	9.6	19.2	\$10,497.31
		<b>221</b>		<b>\$10,500</b>

Labc
65.71
48.75
26.38

coming subject to the rule over the next three years. Because there are no new sources, no

or government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), These rates are from the Office of Personnel Management (OPM) “2018 General Schedule”

ng, within 3 years of the effective date of the revised standards. 21 facilities utilize 30 add-on to be re-tested. (30 x 0.05 = 1.5, rounded up to 2)

ounded).

its, when rounded).

l (48 x 0.1 = 4.8, or 5 respondents, when rounded).

or Rates
Managerial
Technical
Clerical

These rates were updated 2/4/19 to match the rates from the Office of Personnel Management (OPM), 2018

General Schedule.



**Table 2: Average Annual EPA Burden and Cost - NESHAP for Surface Coating of Metal (Year 2**

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
Initial performance test <sup>a</sup>	48	0	0
Repeat performance test-retesting preparation	4	0	0
Repeat performance-retesting	48	0	0
Excess emissions enforcement activities	120	1	120
Review reports			
Notification of applicability	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of special compliance requirements	N/A		
Notification of compliance status	2	1	2
Notification of performance test <sup>c</sup>	4	1	4
Review of initial performance test report <sup>d</sup>	8	1	8
Review of repeat performance test report <sup>d</sup>	8	1	8
Semiannual report of excess emissions <sup>e, f</sup>	8	2	16
Semiannual report of no excess emissions <sup>g, h</sup>	2	2	4
Review of NESHAP waiver application	N/A		
Review startup, shutdown, malfunction report <sup>i</sup>	2	2	4
Review record systems due to SSM revisions <sup>j</sup>	2	2	4
<b>TOTAL (rounded) <sup>k</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources but initial performance tests for new sources are expected to occur.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for (60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + Schedule” which excludes locality rates of pay.

<sup>c</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>d</sup> Facilities that comply using emission capture systems and add-on controls conduct air emissions performance tests on VOC/HAP control devices and would require testing. Assuming a 5% failure rate, two control devices would need to be tested.

<sup>e</sup> It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when rounded).

<sup>f</sup> It is assumed that reports of excess emissions are required semiannually.

<sup>g</sup> We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 respondents).

<sup>h</sup> It is assumed that reports of no excess emissions are required semiannually.

<sup>i</sup> We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed.

<sup>j</sup> These are costs associated with evaluating new SSM record systems in year one.

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

**Coil (40 CFR Part 63, Subpart SSSS) (Amendments)**

(D)	(E)	(F)	(G)	(H)
Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
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	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>

Labc
65.71
48.75
26.38

coming subject to the rule over the next three years. Because there are no new sources, no

or government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General

ing, within 3 years of the effective date of the revised standards. 21 facilities utilize 30 added to be re-tested. (30 x 0.05 = 1.5, rounded up to 2)

ounded).

nts, when rounded).

d (48 x 0.1 = 4.8, or 5 respondents, when rounded).

or Rates
Managerial
Technical
Clerical

These rates were updated 2/4/19 to match the rates from the Office of Personnel Management (OPM), 2018

General Schedule.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Surface Coating of Metal (Year 3**

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
Initial performance test <sup>a</sup>	48	0	0
Repeat performance test-retesting preparation	4	0	0
Repeat performance-retesting	48	0	0
Excess emissions enforcement activities	120	1	120
Review reports			
Notification of applicability	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of special compliance requirements	N/A		
Notification of compliance status	2	1	2
Notification of performance test <sup>c</sup>	4	1	4
Review of initial performance test report <sup>d</sup>	8	1	8
Review of repeat performance test report <sup>d</sup>	8	1	8
Semiannual report of excess emissions <sup>e, f</sup>	8	2	16
Semiannual report of no excess emissions <sup>g, h</sup>	2	2	4
Review of NESHAP waiver application	N/A		
Review startup, shutdown, malfunction report <sup>i</sup>	2	2	4
Review record systems due to SSM revisions <sup>j</sup>	2	2	4
<b>TOTAL (rounded) <sup>k</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources but initial performance tests for new sources are expected to occur.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). which excludes locality rates of pay.

<sup>c</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>d</sup> Facilities that comply using emission capture systems and add-on controls conduct air emissions performance tests VOC/HAP control devices and would require testing. Assuming a 5% failure rate, two control devices would need to be tested.

<sup>e</sup> It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when rounded).

<sup>f</sup> It is assumed that reports of excess emissions are required semiannually.

<sup>g</sup> We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 respondents).

<sup>h</sup> It is assumed that reports of no excess emissions are required semiannually.

<sup>i</sup> We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed.

<sup>j</sup> These are costs associated with evaluating new SSM record systems in year one.

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

**Coil (40 CFR Part 63, Subpart SSSS) (Amendments)**

(D)	(E)	(F)	(G)	(H)
Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
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
23	92	4.6	9.2	\$5,029.96
21	168	8.4	16.8	\$9,185.15
2	16	0.8	1.6	\$874.78
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
		<b>317</b>		<b>\$15,100</b>

Labo
65.71
48.75
26.38

becoming subject to the rule over the next three years. Because there are no new sources, no

or government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%),  
 These rates are from the Office of Personnel Management (OPM) “2018 General Schedule”

ing, within 3 years of the effective date of the revised standards. 21 facilities utilize 30 add-on  
 o be re-tested. (30 x 0.05 = 1.5, rounded up to 2)

ounded).

nts, when rounded).

d (48 x 0.1 = 4.8, or 5 respondents, when rounded).

or Rates
Managerial
Technical
Clerical

These rates were updated 2/4/19 to match the rates from the Office of Personnel Management (OPM), 2018

General Schedule.



**Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs
1	192	10	19	221	\$10,500	\$0
2	0	0	0	0	\$0	\$0
3	276	14	28	317	\$15,100	\$0
Total	468	23.4	46.8	538	\$25,600	\$0
Average	156.0	7.8	15.6	179	\$8,530	\$0

Year	Number of Responses	Total Hours
1	96	221
2	0	0
3	46	317
Total	142	538
Average	47.3	179

Average annual hours per respondent: 3.8

ce

Total Costs
\$10,500
\$0
\$15,100
\$25,600
\$8,530