

Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Cans (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. Reporting Requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Compile and process data	4	4	16
c. Write reports			
i. Initial notification	2	1	2
ii. Notification of compliance status	2	1	2
iii. Notification of construction/reconstruction	2	1	2
iv. Notification of actual startup	2	1	2
v. Notification of performance test ^c	2	1	2
vi. Report of performance test ^c	10	1	10
vii. Semiannual report	6	2	12
viii. Excess emissions report	2	2	4
ix. Startup, shutdown, malfunction report ^d	2	1	2
Subtotal for Reporting Requirements			
2. Recordkeeping requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Plan activities	12	1	12
c. Implement activities	12	1	12
d. Maintain record system for material used	20	1	20
e. Revise record systems due to SSM revisions ^e	8	1	8
f. Become familiar with CEDRI for electronic filing of notifications and reports ^f	8	1	8
g. Time to enter information			
i. Material usage	0.5	365	182.5
ii. Compliance calculation	2	12	24
h. Time to train personnel	10	1	10
i. Store, file, and maintain records	2	12	24
j. Retrieve records/reports	1	12	12
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^g			
Total CAPITAL and O&M COST (rounded) ^g			
GRAND TOTAL (rounded) ^g			

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources. TI
- b. This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.00 per hour for the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupation” have been increased by 110% to account for the benefit packages available to those employed by private industry.
- c. This ICR assumes a re-test rate of 5 percent. Because we are estimating only 1 facility needing to test as a result of the

- d. This ICR assumes 25 percent of facilities use add-on controls and submit startup, shutdown, malfunction (SSM) reports after publication of the final rule in the FR.
- e. We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed reporting and include time to become familiar with CEDRI and the semi-annual reporting form. Two responses with 8 hours.
- f. Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.
- g. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

40 CFR Part 63, Subpart KKKK) (Amendments)

(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
5	20	1	2	\$2,619.84
0	0	0	0	\$0
	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	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		\$2,620
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
5	40	2	4	\$5,239.68
5	40	2	4	\$5,239.68
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
15		92		\$10,479
		115		\$13,100
				\$0
		115		\$13,100

Labor Rate
\$147.40
\$117.92
\$57.02

here will be no additional sources over the three-year period of this ICR.

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

se rule amendments, we are not estimating any re-tests.

ts once per year. This rule amendment will eliminate the SSM report requirement 181 days

veloped SSM record systems in year one. Costs are also associated with the use of electronic
urs per response.

emi-annual reporting form.

s (\$2018)
Managerial
Technical
Clerical

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

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

Table 2: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Cans (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. Reporting Requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Compile and process data	4	4	16
c. Write reports			
i. Initial notification	2	1	2
ii. Notification of compliance status	2	1	2
iii. Notification of construction/reconstruction	2	1	2
iv. Notification of actual startup	2	1	2
v. Notification of performance test ^c	2	1	2
vi. Report of performance test ^c	10	1	10
vii. Semiannual report	6	2	12
viii. Excess emissions report	2	2	4
ix. Startup, shutdown, malfunction report ^d	2	1	2
Subtotal for Reporting Requirements			
2. Recordkeeping requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Plan activities	12	1	12
c. Implement activities	12	1	12
d. Maintain record system for material used	20	1	20
e. Revise record systems due to SSM revisions ^e	8	1	8
f. Time to enter information			
i. Material usage	0.5	365	182.5
ii. Compliance calculation	2	12	24
g. Time to train personnel	10	1	10
h. Store, file, and maintain records	2	12	24
i. Retrieve records/reports	1	12	12
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^f			
Total CAPITAL and O&M COST (rounded) ^f			
GRAND TOTAL (rounded) ^f			

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources. TI
- b. This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.00 per hour for the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupation" has been increased by 110% to account for the benefit packages available to those employed by private industry.

- c. This ICR assumes a re-test rate of 5 percent. Because we are estimating only 1 facility needing to test as a result of the
- d. This ICR assumes 25 percent of facilities use add-on controls and submit startup, shutdown, malfunction (SSM) reports
- e. We are proposing the elimination of the Startup, Shutdown, & Malfunction (SSM) exemption in this rule. Costs associated with
- f. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

40 CFR Part 63, Subpart KKKK) (Amendments)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	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 ^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	0	0	\$0
0	0	0	0	\$0
		0		\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0		0		\$0
		0		\$0
				\$0
		0		\$0

Labor Rate
\$147.40
\$117.92
\$57.02

here will be no additional sources over the three-year period of this ICR.

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

These rule amendments, we are not estimating any re-tests.

Tests once per year. This rule amendment will eliminate the SSM report requirement 181 days associated with elimination of the SSM exemption include time for re-evaluating previously

s (\$2018)
Managerial
Technical
Clerical

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 3: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Cans (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. Reporting Requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Compile and process data	4	4	16
c. Write reports			
i. Initial notification	2	1	2
ii. Notification of compliance status	2	1	2
iii. Notification of construction/reconstruction	2	1	2
iv. Notification of actual startup	2	1	2
v. Notification of performance test ^c	2	1	2
vi. Report of performance test ^c	10	1	10
vii. Semiannual report	6	2	12
viii. Excess emissions report	2	2	4
ix. Startup, shutdown, malfunction report ^d	2	1	2
x. Add-on control performance test ^e	30	1	30
Subtotal for Reporting Requirements			
2. Recordkeeping requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Plan activities	12	1	12
c. Implement activities	12	1	12
d. Maintain record system for material used	20	1	20
e. Revise record systems due to SSM revisions ^f	8	1	8
f. Time to enter information			
i. Material usage	0.5	365	182.5
ii. Compliance calculation	2	12	24
g. Time to train personnel	10	1	10
h. Store, file, and maintain records	2	12	24
i. Retrieve records/reports	1	12	12
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^g			
Total CAPITAL and O&M COST (rounded) ^g			
GRAND TOTAL (rounded) ^g			

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources. TI

- b. This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.00 per hour for all other workers. These rates are based on the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupation, by Industry, and by Sex, Race, and Hispanic or Latino Ethnicity." These rates have been increased by 110% to account for the benefit packages available to those employed by private industry.
- c. This ICR assumes a re-test rate of 5 percent. Because we are estimating only 1 facility needing to test as a result of the rule, this rate is not reflected in the cost estimates.
- d. This ICR assumes 25 percent of facilities use add-on controls and submit startup, shutdown, malfunction (SSM) reports after publication of the final rule in the FR.
- e. Facilities that comply using emission capture systems and add-on controls are required to conduct air emissions performance testing. This includes hours for the facility to obtain the testing contractor, plan and attend the test, review the test report, and load it to the testing system by the facility's state-issued permit. The final RTR amendments will require this facility to do performance testing.
- f. We are proposing the elimination of the Startup, Shutdown, & Malfunction (SSM) exemption in this rule. Costs associated with the development of SSM record systems in year one. Costs are also associated with the use of electronic reporting and include time and materials per response.
- g. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

40 CFR Part 63, Subpart KKKK) (Amendments)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	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 ^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
1	2	0.1	0.2	\$262
1	10	0.5	1	\$1,310
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
1	30	1.5	3	\$3,929.76
		48		\$5,502
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
3		0		\$0
		48		\$5,500
				\$46,900
		48		\$52,400

Labor Rate
\$147.40
\$117.92
\$57.02

here will be no additional sources over the three-year period of this ICR.

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

se rule amendments, we are not estimating any re-tests.

ts once per year. This rule amendment will eliminate the SSM report requirement 181 days

mance testing, within 3 years of the effective date of the revised standards. Labor totals
ERT. One facility has three add-on controls and is not already required to perform periodic
; every five years.

iated with elimination of the SSM exemption include time for re-evaluating previously
e to become familiar with CEDRI and the semi-annual reporting form. Two responses with 8

s (\$2018)
Managerial
Technical
Clerical

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 KKKK) (Amendments)

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	100	5	10	115	\$13,100
2	0	0	0	0	\$0
3	42	2	4	48	\$5,500
Total	142	7	14	163	\$18,600
Average	47	2	4.7	54	\$6,200

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	5	15	23	92	115
2	5	0	0	0	0
3	5	3	48	0	48
Total	-	18	71	92	163
Average	5	6.0	24	31	54

Average annual additional costs per respondent: \$4,360

ce Coating of Metal Cans (40 CFR

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$13,100
\$0	\$0
\$46,900	\$52,400
\$46,900	\$65,500
\$15,633	\$21,800

Hours per Response	Hours Per Respondent
8	23
-	0
16	10
-	33
9.1	11

Table 5: Average Annual EPA Burden and Cost - NESHAP for Surface Coating of Metal 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)
1. Initial performance test	24	1	24
2. Repeat performance test	24	1	24
3. Report review			
a. Initial notification	8	1	8
b. Notification of performance test ^c	8	1.2	10
c. Notification of compliance status	8	1	8
d. Notification of construction/reconstruction	8	1	8
e. Notification of actual startup	8	1	8
f. Report of performance test ^d	8	1.2	10
g. Semiannual report	12	2	24
h. Excess emissions report	4	2	8
i. Startup, shutdown, report ^e	8	1	8
j. Review record systems due to SSM revisions ^f	2	2	4
TOTAL (rounded) ^g			

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources.
- b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for the 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.
- c. We have assumed that it will take four hours to review the notification of the test and the test plan for each respondent.
- d. We have assumed that it will take eight hours to review the test report for each respondent.
- e. We have assumed that 25 percent of respondents will submit a startup, shutdown, malfunction report.
- f. These are costs associated with evaluating new SSM record systems in year one.
- g. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Cans (40 CFR Part 63, Subpart KKKK) (Amendments)

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^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	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
5	20	1	2	\$1,093.47
	23			\$1,090

Labc
\$65.71
\$48.75
\$26.38

es. There will be no additional sources over the three-year period of this ICR.
 for 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"

ndent.

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 6: 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)
1. Initial performance test	24	1	24
2. Repeat performance test	24	1	24
3. Report review			
a. Initial notification	8	1	8
b. Notification of performance test ^c	8	1.2	9.6
c. Notification of compliance status	8	1	8
d. Notification of construction/reconstruction	8	1	8
e. Notification of actual startup	8	1	8
f. Report of performance test ^d	8	1.2	9.6
g. Semiannual report	12	2	24
h. Excess emissions report	4	2	8
i. Startup, shutdown, report ^e	8	1	8
j. Review record systems due to SSM revisions ^f	2	2	4
TOTAL (rounded) ^g			

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources.
- b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for a 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.
- c. We have assumed that it will take four hours to review the notification of the test and the test plan for each respondent.
- d. We have assumed that it will take eight hours to review the test report for each respondent.
- e. We have assumed that 25 percent of respondents will submit a startup, shutdown, malfunction report.
- f. These are costs associated with evaluating new SSM record systems in year one.
- g. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Cans (40 CFR Part 63, Subpart KKKK) (Amendments)

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^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	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		0		\$0

Labo
\$65.71
\$48.75
\$26.38

es. There will be no additional sources over the three-year period of this ICR.

for 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"

ndent.

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 7: 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)
1. Initial performance test	24	1	24
2. Repeat performance test	24	1	24
3. Report review			
a. Initial notification	8	1	8
b. Notification of performance test ^c	8	1	8
c. Notification of compliance status	8	1	8
d. Notification of construction/reconstruction	8	1	8
e. Notification of actual startup	8	1	8
f. Report of performance test ^d	8	1	8
g. Semiannual report	12	2	24
h. Excess emissions report	4	2	8
i. Startup, shutdown, report ^e	8	1	8
j. Review record systems due to SSM revisions ^f	2	2	4
TOTAL (rounded) ^g			

Assumptions:

- a. We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources.
- b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for a 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.
- c. We have assumed that it will take four hours to review the notification of the test and the test plan for each respondent.
- d. We have assumed that it will take eight hours to review the test report for each respondent.
- e. We have assumed that 25 percent of respondents will submit a startup, shutdown, malfunction report.
- f. These are costs associated with evaluating new SSM record systems in year one.
- g. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

l Cans (40 CFR Part 63, Subpart KKKK) (Amendments)

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1	24	1.2	2.4	\$1,312
0	0	0	0	\$0
0	0	0	0	\$0
1	8	0.4	0.8	\$437.39
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
1	8	0.4	0.8	\$437.39
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		46		\$2,190

Labc
\$65.71
\$48.75
\$26.38

ces. There will be no additional sources over the three-year period of this ICR.

t for 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”

ponent.

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 Cans (40 CFR Part 63, Subpart KKKK) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	20	1	2	23	\$1,090	\$0	\$1,090
2	0	0	0	0	\$0	\$0	\$0
3	40	2	4	46	\$2,190	\$0	\$2,190
Total	60	3.0	6.0	69	\$3,280	\$0	\$3,280
Average	20.0	1.0	2.0	23.0	\$1,090	\$0	\$1,090

Year	Number of Responses	Total Hours
1	10	23
2	0	0
3	2	46
Total	12	69
Average	4.0	23.0

Average annual hours per respondent:

5.8